UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM

From: Larry Turner, Ph. D.[signed JUL 23, 2002]
Environmental Field Branch
Field and External Affairs Division

To: Arthur-Jean Williams, Chief
Environmental Field Branch
Field and External Affairs Division

Subject: Effects Determination for Propargite for Pacific Anadromous Salmonids

I reviewed data and other information for propargite, a pesticide named by the Washington Toxics Coalition (WTC) and included in the court order for 'effects determinations' and potential consultation with the National Marine Fisheries Service. A Reregistration Eligibility Decision (RED) document was developed for propargite in early 2000 and was signed in September, 2001. I have used this RED, including the risk assessment chapter associated with, but not included in the RED. To develop an analysis of the potential for effects on endangered and threatened Pacific salmon and steelhead, I have adapted the more general findings of the RED to the various ESUs of these salmon and steelhead, and I have also sought new or revised information since the RED was developed.

Based on the RED and additional considerations indicated in my analysis and other attached or referenced materials, I conclude that the use of propargite will have no effect on seven salmon and steelhead Evolutionarily Significant Units (ESUs), is not likely to adversely affect twelve salmon and steelhead ESUs, and may affect seven salmon and steelhead ESUs. I propose that if OPP adopts a no-spray buffer between sites where propargite may be used and sites where salmon and steelhead occur, jeopardy would be avoided and take would most likely be eliminated, for five ESUs if this buffer were to be applied to major propargite use sites in the Pacific Northwest (i.e., mint, seed alfalfa, potatoes, and hops). For two ESUs, jeopardy would be avoided and incidental take would most likely be avoided if the same buffer were applied to all propargite use sites.