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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Memorandum

Subject: "No Effect" Determination for 2, 4-D EHE for the Northern California/Southern Oregon Coastal Coho Salmon

From: Michael Patterson, Ph. D. /s/ 5-10-04
Environmental Field Branch
Field and External Affairs Division

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

I reviewed data and other information for 2, 4-D EHE, a registered herbicide named by the Californian's for Alternatives to Toxics (CATs) and included in the Consent Decree that settled the case CATs brought against EPA. 2, 4-D EHE is registered nationally as a broad spectrum herbicide. In forestry and forest tree applications it is used to enhance conifer release. The chemical can be use for many other purposes in forested areas, including trail preservation, campground clearance, and weed control near outbuildings. It is approved for use in forest trees, soybeans, corn, clearing rights-of-way, roadsides, cleared areas, and other crops. The Environmental Fate and Effects Division (EFED) has completed an environmental risk assessment supporting the pending Reregistration Eligibility Decision (RED) on 2, 4-D. While the assessment indicates 2,4-D EHE is toxic to fish, 2,4-D EHE degrades rapidly to 2,4-D acid. The Risk Quotients for 2,4-D acid show this form to be non-toxic to animals, including fish.

I have adapted the more general findings of the EFED assessment to develop an analysis of the potential for effects on a specific Evolutionary Significant Unit (ESU) of salmon - the Northern California/Southern Oregon coastal Coho. My analysis addresses changes in uses and rates that have been put on most labels since the RED development process began.

Based upon the best available information and data, I have determined that use of 2, 4-D EHE in forestry or forest tree applications will have no effect on the Northern California/Southern Oregon coastal Coho salmon ESU.

Attachment