



University of Hawaii at Manoa

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February 27, 1984

RR:0074

Mr. James W. Morrow
Chairperson, Environmental Council
550 Halekauwila Street
Room 301
Honolulu, Hawaii 96813

Dear Jim:

Amendment to Exemption List
Item: Vegetation Clearing from Streams
(Use of Herbicide Rodeo)
Department of Public Works
City and County of Honolulu

In response to your request of February 3, 1984, we have reviewed the proposed amendment to the exemption list as requested by the City and County of Honolulu, Department of Public Works, for the use of the herbicide Rodeo in clearing vegetation from streams. We note that the use of "Rodeo" "will strictly follow the label instructions and will not be used in Kahana, Punaluu, or Kaluanui streams."

We have been assisted in this review by John Hylin, Agriculture Biochemistry; Roger Fujioka, Microbiology; and Jacquelin Miller and Antonio De Oteyza, Environmental Center.

The information provided by the manufacturer and our reviewers indicates that Rodeo is a reasonably safe herbicide with minimal toxic effects on mammals, birds, fish and crustacea when used in accordance with the label requirements. Furthermore, it has been shown to have minimal potential for bioaccumulation in the food chain and is readily broken down by microorganisms, hence it does not persist in the environment.

While the manufacturer has provided considerable evidence of the toxicity of the product to a number of adult species, (Table 2, Environment Toxicity Data) we have been unable to evaluate its potential effect on larval stages of local stream fauna. Unless further information to the contrary is presented, it would seem appropriate to suggest careful initial observation and consider some required subsequent monitoring of the streams where the product will be used to assure that larval species of fish, mollusks, or shrimps are not significantly affected.

Mr. James W. Morrow

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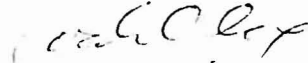
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The advisory information proceed by Barbara Siegel from the Pesticide Hazard Assessment Project of the University of Hawaii with regard to the potential for anaerobiosis from decaying vegetation is of note. We would certainly concur with her comments and only add that similar precautions with the use of the other exempt herbicides, Dowpon, Roundup and Diquat 2 should be followed.

Assuming that the use of Rodeo will provide within the specified label directions and under due care to limit the potential for oxygen deficiency and subsequent faunal impacts, the requested exemption seems appropriate.

We appreciate the opportunity to assist the Council in its deliberations on this requested exemption. If we can be of further assistance, please call.

Yours truly,


Doak C. Cox
Director

cc: Jacquelin Miller
John Hylin
Roger Fujioka
Antonio De Oteyza