Jack Edmonson

The hazard assessment section is still very rough, but I wanted you to
give you some of my thoughts before I left on vacation. What I am looking for
is good justification to request an avian acute oral LD50 study to fulfill
that data gap which will allow us to evaluate the potential hazards posed by
these granules to endangered and non-endangered species. I felt that if we
could identify some endangered bird species that may feed in sorghum fields
that would provide the necessity for the testing. I am providing a list
of the endangered species in most sorghum growing states. I did not have time
to finish all states (New Mexico, Tennessee, and Virginia). Those counties
where sorghum is grown is indicated by the yellow magic marker.

The Attwater's prairie chicken in Texas and the Cape Sable are two avian species
that I feel do or may utilize sorghum fields for feeding. I don't know one
way or other for other seed- and insect-eating species.

I hope that my identification of the species and counties can ease your job as
we discussed over the phone a couple of weeks ago.

Bill Rabet

Biological Opinion

Telephone conversation with Jack Edmonson at OES on 10/22/81.

Attwater's prairie chicken is the probably the only endangered
bird species in sorghum. Feeding and brood-rearing in sorghum occurs from
April through August. Utilization of sorghum fields is high and of special
concern for the chicken. An avian acute oral LD50 study is essential to
assessment of terbuxen impact on this species.

Available time and priorities prevent identification of aquatic and insect species
which may be affected by this highly toxic chemical. Closer analysis should be made
when avian testing is available. Request a formal opinion when LD50 data
are available.