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Organization:

Title:

Comments: WE CANNOT LIVE ON AS THE NATURAL WORLD DIES

ELIMINATE CATTLE GRAZING ON OUR PUBLIC LANDS

LAND OF MANY USES AND ABUSES!

SAVE LIVES AND LIFE SYSTEMS

DO RIGHT

BE WISES

EVERY TREE HAS A STORY

RESPECT AND PROTECT NATIVE AMERICAN SACRED FORESTS AND LANDS

DO GOOD

GIVE YOUR ALL

WE MUST

Honorable Chair of the Tohono O[rsquo]odham Nation, Verlon Jose kindly asks us all to respect every twig and rock in their sacred homeland. We make every effort to live by this. The Tohono O[rsquo]odham ancestors still dwell in these holy places and the native creatures are the relatives of the Tohono O[rsquo]odham people.

I am a Jane Goodall Institute two-time grantee for Stewardship and the Preservation of Life with the privilege and honor of living and working in the Tohono O[rsquo]odham Haki:dag [ndash] the sacred homeland of the Tohono O[rsquo]odham Nation in occupied Tucson and Babad Du[rsquo]ag - the Catalina Mountains of the Sonoran Desert

I teach Stewardship and Impacts to Native Species in the Tohono O[rsquo]odham homeland at the University of Arizona. John Amato, RN and I became Arizona Site Stewards in 2016 (Figure 1) (Figure 2) for respecting, protecting and preserving Tohono O[rsquo]odham and other Native American ancestral sacred sites in Babad Du[rsquo]ag of the Coronado National Forest, the largest and most biodiverse national forest in the US. It is unfortunate and inappropriate that this extraordinary national forest is named for a conquistador who committed atrocities against the First Peoples of this Southwest region.

We report vandalism (Eisenberg and Amato 2017 (<https://intercontinentalcry.org/tohono-oodham-sunburst-petroglyph-vandalized-hakidag/>) of Native American cultural resources and protect the natural heritage of these holy places by removing invasive plants that harm and kill Ha?s?an~ [ndash] Carnegiea gigantea, Giant Saguaro and other beloved native species.

Lamentably, some Homo sapiens do not respect nature. According to the U.S. Constitution and the United

Nations Sustainable Development Goals, we have the right to a clean, healthy and safe environment that sustains all life. A healthy environment supports healthy beings rather than a degraded one. We are dedicated to giving voice to our Pachamama and preserving the Rights of Mother Earth and her beloved creatures.

Sadly, I found a young quail (Figure 3) with severe neurological damage who was dragging her leg near to where a deeply misguided pest control company [ndash] Arizona Pest Control unlawfully placed deadly difethialone anticoagulant poison rodenticide traps (Figure 4) in our 90-acre wildlife corridor without authorization or permission. I tried to feed and hydrate her and made a vegetative nest to prop her up as she was not able to stand or sit properly. I then turned her over to Arizona Bird Rescue. Their veterinarians could not save her[hellip]

I contacted USDA about the numerous poison rodent traps in our wildlife corridor and were told to contact the Arizona Department of Agriculture, which is supposedly [ldquo]the pesticide regulatory agency in Arizona[rdquo]. *Both Arizona Department of Agriculture and EPA would not address the improper and illegal placement of deadly difethialone rodenticide traps in our wildlife corridor by the pest control company, Arizona Pest Control (Figure 5) and the residents who do not want rodenticides in their backyard to possibly poison their children, pets and wildlife. All of these traps were placed unlawfully in our wildlife corridor and not in the private property of residents with whom the pest control company has contracts endangering children, pets and wildlife (Figure 6) (Figure 7).

We brought out Arizona Department of Agriculture [ldquo]inspectors[rdquo] because of the numerous poison rodent traps and insect traps in our wildlife corridor, and they were not helpful. They failed to document the traps that we did encounter together and did not conduct a thorough inspection. I contacted Governor Hobbs, who is an environmental attorney and opened casework with senators and congressional representatives (Figure 8) as I reached out to numerous agencies for assistance to no avail[hellip] Arizona Department of Agriculture and EPA stated, [ldquo]The label is law[rdquo] and the pest control company followed the label![rdquo] I reported Arizona Pest Control to the Better Business Bureau and this corporation threatened to sue me for defamation. Truth begets justice. California prohibits the use of deadly difethialone rodenticide as stated on the label.

I spoke with Luke Thompson from Arizona Game and Fish. He said that in Arizona one can target native rodents! Therefore, THE LABEL IS NOT LAW because native rodents are not on the label! This is disgraceful and preposterous. Where is it written into law that one can poison native species? I await their response to this pressing question. I contacted The Fish and Wildlife Service about the rare, endangered and threatened rodents in Arizona. Some are teetering on the brink of extinction such as the Mesquite Mouse, the New Mexico Jumping Mouse and Mount Graham Red Squirrel.

On page 19 of Arizona Revised Statutes Title 3 - Agriculture Chapter 20 [ndash] Pest Management Division (Figure 9) it states: 4. Applying pesticides in a manner that is inconsistent with the label and labeling of the pesticide *or that may cause harm to the public, the environment or nontarget animals such as the unlawful placement of Arizona Pest Control difethialone rodenticide traps in our Catalina Shadows Common Area - 90-acre wildlife corridor without authorization or permission.

*Children, pets and wildlife are endangered by the unlawful and irresponsible placement of multiple deadly difethialone rodenticide rodent traps in our Catalina Shadows Common Area - 90-acre wildlife corridor by Arizona Pest Control, without authorization or permission. This violates our U.S. Constitutional rights to a clean, healthy and safe environment.

Veterinarian Dr. John Mundahl, DVM stated that difethialone should be taken off the market because there is no antidote.

We seek to ban all deadly anticoagulant rodenticides including difethialone as Arizona Pest Control is not applying it responsibly. It has no place in a wildlife corridor - our HOA Common Area where multiple poison traps

were set unlawfully. We sincerely hope we can implement proactive, positive change in Arizona and the nation for the preservation of life. Mother Earth and her beloved ones are in crisis in this extreme environment and we must give our all and do our very best. There are indeed safe and effective alternatives to these deadly anticoagulant rodenticides that poison children, pets, wildlife and ecosystems.

Elid g Jewed [ndash] Respect the Earth

[ldquo]We are given life that we may enhance life.[rdquo] - Gemara

[ldquo]We cannot live on if the natural world dies.[rdquo] [ndash] Jane Goodall, UN Messenger of Peace

Acknowledgements

There are no conflicts of interest in the preparation and submission of this manuscript.

References

Eisenberg, Amy and John Amato. 2017. Sunburst Petroglyph Vandalized in the Tohono O[rsquo]odham Haki:dag. Intercontinental Cry. <https://intercontinentalcry.org/tohono-oodham-sunburst-petroglyph-vandalized-hakidag/> 13 December 2017.

ATTACHMENT: Stewardship and the Preservation of Life in the Tohono O.docx - this is the same content that is coded in this box; it was also included as an attachment

ATTACHMENT: Figure 1. Arizona Site Steward Certification.jpg - certificate of commenter completing the Arizona Site Steward Program

ATTACHMENT: Figure 2. Arizona Site Steward Card.jpg - site steward card for commenter

ATTACHMENT: Figure 3. Young Kakaichu - quail.jpg - photo of bird in a bowl

ATTACHMENT: Figure 4. Arizona Pest Control difethialone poison trap unlawfully placed in our common area wildlife corridor.jpeg - photo of cinderblock wall with a low white box and opening

ATTACHMENT: Figure 5. Difethialone soft bait.pdf - IPRIA Label Amendment letter from EPA regarding Difethialone Soft Bait

ATTACHMENT: Figure 6. Toxic rodenticide food web.png - image of a rodenticide food web

ATTACHMENT: Figure 7. Lethal Rodenticide Food Chain.jpg - image of a rodenticide food chain

ATTACHMENT: Figure 8. WF Attachment 3164732 Eisenberg referral letter to Governor Hobbs.pdf - copy of a letter from Arizona Senator to Govenor Hobbs regarding commenter's concern over bait traps

ATTACHMENT: Figure 9. Laws_Pest_Management_Division.pdf - Arizona Revised Statutes Title 3 - Agriculture Chapter 20 [ndash] Pest Management Division