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Organization:

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Comments: To whom it may concern,

I currently own property in the proposed treatment area. I have also been studying the affects of pesticide exposure on wildlife, specifically mule deer, for several years now.

There is a definitive correlation between pesticide applications and negative affects on wildlife. These negative affects include malformations, birth defects, and reduced fecundity.

Some of these malformations include:

Brachygnathia Superior(under bite) and Mandibular Brachynathia(Overbite) examples of which can be seen here: http://rutalocura.com/files/Examples_of_Animals_-_Disrupted_Facial_Bone_Development.pdf

Misplaced hemiscrota, cryptorchidism, and atrophied testicles, examples of some of these can be seen here: http://rutalocura.com/files/Discussion_of_size_and_placement_of_Hemiscrota_on_Mammal_Species_.pdf

In association with these testicular abnormalities we also see abnormal antler development, retained velvet, and a lack of antler shedding in these affected deer. In the case of misaligned hemiscrota, we also see asymmetrical antler development. Many of these testicular deformities and abnormalities are known to be induced by herbicide exposure. See reference studies below.

2,4-D "Developmental Toxicity It is observed to be a developmental toxicant. Some observed effects are increased gestation length, skeletal abnormalities, and effects on the thyroid and gonads (#EPA RED FACTS, 2005)." From here: <http://www.toxipedia.org/display/toxipedia/2,4-D>

"Testicular damage has also been observed in rats administered picloram and 2,4-D" From here: <http://www.beyondpesticides.org/pesticides/factsheets/Picloram.pdf>

"Also, in male rats, feeding of picloram resulted in an increased frequency of atrophied testicles." From here: <http://bluewaternavy.org/general/picloram1.pdf>

"The decrease in testes weight was associated with focal testicular atrophy and loss of spermatogenic cells in the lobuli of testes." From here: <http://www.ncbi.nlm.nih.gov/pubmed/17159792>

"induction of epididymal malformations in combination with testicular atrophy" From here: <http://www.ncbi.nlm.nih.gov/pubmed/11752686>

"Synthetic hormone-disrupting chemicals may play a role in the increased frequency of cryptorchidism observed in some studies." From here: <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC1469503/>

"The association between congenital cryptorchidism and some persistent pesticides in breast milk as a proxy for maternal exposure suggests that testicular descent in the fetus may be adversely affected." From here: <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC1513324/>

"In addition, epidemiological studies have suggested that exposure to pesticides may also be associated with cryptorchidism." From here: <http://www.sciencedirect.com/science/article/pii/S0303720711006782>

"Compared to unexposed women working in horticulture, pesticide exposed women had a risk of having sons with cryptorchidism" From here: <http://www.ehjournal.net/content/10/1/100>

More on other areas and wildlife exposure can be found here: www.westernwildlifeecology.org

Here is a link to our emerging surveillance of pesticide use on the Minidoka portion of the Sawtooth National Forest. <http://rutalocura.com/onemile> Under the proposed plan we expect to see an increase in damage to desirable plants, increased wildlife exposure, and increased incidences of malformations in wildlife, along with corresponding declines in those wildlife populations.

As a hunter, ecologist, and conservationist, I ask that you reconsider the use of chemical herbicides on the Sawtooth National Forest, or consider a massive decrease in use at a minimum. The premise that the use of these chemicals is some how for the benefit of the ecology, wildlife, or cattle for that matter is extremely flawed at a minimum. These chemicals are a major part of the degradation of our National Forests, and wildlife, not a part of restoring or conserving them.

Josh leavitt
Western Wildlife Ecology