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Comments: WildLands Defense strongly opposes the proposed changes to US Forest Service Grazing.

Wildlands Defense requests the USFS instead consider ways to rapidly de-stock and END grazing across National Forest lands in order to foster conservation of clean and abundant water, viable populations of fish and wildlife, and to buffer lands from climate change stresses.

Domestic livestock grazing pollutes water, causes desertification, erosion and loss of water flows; promotes weed infestation and spread, including rapid spread of flammable annual weeds like cheatgrass that doom native ecosystems and biodiversity; , and seriously degrades, fragments and destroys habitats for native terrestrial and aquatic biota, from Sage-grouse to Redband Trout.

We also request the Forest scrap the separate grazing decision appeals process for permittees, as this serves to cut out the public voice. It highly favors abusive livestock grazing practices as permittees (especially without public involvement) - exert political pressures on USFS officials when they try to change harmful grazing.

The Rangeland Management Directives would significantly adversely affect millions of acres of public land, including Wilderness, where livestock grazing is fundamentally at odds with sensitive species conservation/biodiversity protection/watershed health, as well the mandate of the Wilderness Act that Wilderness remain "untrammled" and the mandates of the ESA

- \* Livestock grazing on National Forests, significantly degrades our public lands. Impacts from grazing must be fully examined and addressed through a transparent, public process that complies with federal laws, including the National Environmental Policy Act.

- \* Any revisions to Forest Service grazing policies should encourage and prioritize voluntary grazing permit retirement to reduce permitted livestock grazing across the National Forest system. Federal land and habitat restoration and fire/fuels funds should be used for this - and not more scorched earth vegetation "treatments" that only serve to worsen the effects of the climate crisis. This is an appropriate use of fuels funds, as grazing promotes flammable weeds- often irreversibly invading native plant communities and worsening the wildfire situation.

- \* The FS should not return grazing to the excessive levels permitted in the 1960s when it is clear conditions can not support current, grazing levels.

- \* The Forest Service must develop policies that ensure the agency will maintain authority for grazing management decisions and hold grazing permittees accountable for the impacts their livestock has on public lands. Measurable mandatory controls on livestock grazing, trampling, and browsing impacts must be applied on all permits.

- \* The recovery of imperiled or threatened species needs to be prioritized on National Forests and livestock grazing managed so as not to jeopardize species' recovery.

- \* This leftover Trump administration proposal to increase grazing would not only fuel livestock grazing's contribution to the climate and biodiversity crises, but runs directly counter to the Biden Administration's 30x30 land conservation agenda by sacrificing what could be protected lands to the commercial livestock industry..

- \* If the Forest Service wishes to amend its directives, the Forest Service must undertake a more comprehensive rulemaking process that complies with the National Environmental Policy Act.