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Comments: Dear Decision Influencers and Makers:

I contend that commercial livestock grazing on public lands and the associated extraction of public grasses, forage, and water, is inconsistent with science-based conservation of our public lands. Here is a list of scientifically documented harmful effects of commercial livestock grazing on public lands (including holistic, regenerative, restorative, passive season-long, and other livestock grazing).

Harmful Effects

- * introduction of invasive species
- * disease transmission
- * increase in fire danger
- * increased soil exposure, drying, compaction, erosion, and sedimentation
- * off-road vehicle trails, with associated noise, speeds, erosion, compaction, sedimentation
- * construction of roads
- * trucks and other motorized vehicles creating unauthorized roads
- * construction of facilities, such as cabins, water lines, and fences
- * damage to riparian areas, wetlands, and watersheds
- * damage to streamflow regimes
- * diminished water quantity as well as quality
- * surface water pollution
- * damage to aquatic habitat and species
- * cumulative contributions to the desertification of the public land
- * loss of fish and wildlife, both reduction of population and loss of species
- * displacement of wildlife
- * fragmentation of wildlife habitat
- * disruption of wildlife migration
- * slaughter of predatory species, such as bears and wolves
- * disturbance of bird breeding, roosting and feeding
- * removal of native flora species, such as pinyon juniper
- * degradation of native plant communities
- * reduction of nature's carbon storage capability
- * exacerbation of climate stresses and thereby contributing to climate change
- * public subsidies for commercial operations on public lands
- * unfair advantage given to subsidized operations versus operations on only private land
- * unsustainable production of agricultural commodities on public lands
- * general over-burdening of fragile arid lands
- * exclusion of other uses, including habitat and wildlife conservation
- * reduction of public access to public lands
- * loss of solitude and foot-powered recreation
- * interference with post-fire habitat restoration
- * failure of land stewards to document trespass violations, overstocking, and other harms
- * failure of land stewards to enforce trespass, overstocking, and other regulations
- * politicization of public land stewardship
- * commercial marketing of unhealthy diet rich in meats

Wilderness Watch also provides good points:

* The Rangeland Management Directives have the potential to significantly affect millions of acres of public land, including Wilderness, where livestock grazing is fundamentally at odds with the mandate of the Wilderness Act that Wilderness remain "untrammeled."

* Livestock grazing on National Forests, including millions of acres of Wilderness, 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, including within Wilderness, so as to protect Wilderness, other public lands, and wildlife.

* The FS should not return grazing to the excessive levels permitted in the 1960s when it is clear conditions oftentimes cannot support increased, or even 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.

* 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.

* The Forest Service must do the right thing for Wilderness, other public lands, and wildlife by dropping its proposed Rangeland Management Directives.

* 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.

Furthermore, I attach three brief articles summarizing the impacts of grazing on public lands, both written by the ecologists George Wuerthner.

* Grazing and Climate Change: the Influence of Livestock on Soil Carbon Storage, CounterPunch, April 9, 2021

* Wilderness and Grazing: Time to Send the Cows Home, CounterPunch, March 9, 2021

* How Livestock Impacts Ecosystems, Wildlife News, November 13, 2020

You can also listen to George Wuerthner speak about public land grazing on the Rewilding podcast at <https://rewilding.org/episode-20-public-lands-grazing-with-george-wuerthner/>

Yes, I understand that a range manager's job depends upon keeping commercial livestock on public lands for private profit, but if a range manager is working for private goals then a private employer and private lands are appropriate.

Please consider these points carefully. The world is changing and I don't want degradation of our public lands as a byproduct.

Respectfully,
Anne Millbrooke