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Comments: I oppose the proposed changes to the Grazing Directives that expand livestock grazing on Forest Service lands. I oppose any expansion of livestock grazing on FS lands. I oppose any increase of grazing within currently grazed areas. These changes if implemented would result in widespread degradation of FS rangelands.

I oppose the proposed changes to the Grazing Directives that require vacant allotments to be filled. Vacant allotments provide very valuable wildlife habitat and in all cases I have experience with were vacated because they were not suitable for grazing with domestic livestock. In some allotments former grazing of domestic livestock was responsible for severe erosion due to the ruggedness of the allotment. A second reason was that the base ranch property was subdivided and converted to residential use. By vacating the allotment the loss in wildlife habitat caused by the conversion of ranches to residences was mitigated and wildlife was able to sustain itself in a more developed landscape. In all cases I have been familiar with as an FS employee or recreating on FS lands in no cases has grazing of domestic stock benefited native wildlife - instead livestock inevitably compete with native wildlife for resources and exclude them behaviorally. The public supports prioritizing wildlife habitat over livestock grazing on public lands. I remember comments on proposals when I worked for the FS that stated wisely that wildlife should be prioritized on FS lands because they got the short end of the stick on private lands. There is no public support for these changes - Trump was voted out of office and was elected despite losing the popular vote because of a flawed and anachronistic election system that disenfranchised millions of American voters.

The system under which domestic livestock are grazed on FS is guaranteed to result in resource damage. The permittee owns the stock but not the land. Domestic livestock damage the natural ecosystem. Most of the allotments on FS that I have known are grazed at levels that alter the natural vegetative communities, degrade water quality and soils, exacerbate the spread of invasive weeds, and destroy riparian habitats. Domestic livestock compete with native wildlife for reduced forage for and displace native wildlife.

We are currently experiencing global warming which is resulting in hotter and drier conditions in the western U.S where much of the FS grazing land is located. It is a scientific fact that the carrying capacity of western rangelands is declining due to global climate change. All allotments should be reanalyzed in respect to the impacts of ongoing climate change. For many allotments the reduction in productivity caused by climate change will require grazing capacity to be reduced or grazing to be eliminated in order to prevent wholesale loss of productivity which is occurring widely throughout FS rangelands.

Currently most FS rangelands are overgrazed and in fair-poor condition. If these directives are implemented there will be a widespread decline in rangeland condition a widespread increase in erosion increased degradation of water quality and loss of productivity on FS rangelands.

In no case should grazing use be increased on any allotment without a biologically valid assessment of range production and condition to support it. I know of no FS rangelands that would benefit ecologically from increased grazing.

These proposed directives were initiated under the Trump administration which remains infamous for its total lack of regard for science or for biological integrity or for ecological health or for conservation of natural resources.

These directives like the Trump administration should end right now and not be allowed to degrade our rangelands harm our native wildlife habitat and degrade our water and recreation resources into the future.