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Comments: The best thing that could happen for ecological integrity, watershed health and robust wildlife habitats would be to phase out most livestock grazing on national forest lands. I am a retired fisheries biologist. During my career on the Helena-Lewis & Clark National Forest, I witnessed on a daily basis the overall failure of range management to protect riparian ecosystems, fisheries habitats and water quality. It is common knowledge that permittees fail again and again to comply with the requirements of their grazing permits with regard to utilization rates, grazing seasons and responsibilities for maintaining rangeland improvements such as exclosure fencing. The problem is the lack of economic incentive to comply with grazing regulations and the many logistical challenges of managing livestock dispersed across remote landscapes. By nearly every measure of rangeland health and functioning stream conditions, livestock grazing on national forests in the intermountain west is ecologically harmful. Adaptive management has largely been a euphemism for excusing the perpetual failure to meet desired conditions for soils, vegetation, fish and wildlife habitats, riparian health and watershed integrity.

Rather than superficial tweaking of a failed management program, what is most needed now is an honest assessment of the true environmental impact of livestock grazing on national forests. It is high time to permanently close allotments that have chronically been out of compliance with permit requirements and ecological standards. The last thing the Forest Service should be doing is restocking vacant allotments that have just begun to heal from many years of overgrazing and poor management. The most serious shortfall of current grazing directives is the utter lack of accountability for non-compliance with permit requirements.

I support any and all updates to rangeland management directives that will result in LESS grazing on national forests and grasslands, and REDUCE the many adverse impacts of livestock grazing on aquatic and terrestrial ecosystems on our public lands. New directives are also needed to combat the causes of climate change resulting from the Forest Service's grazing program. The increasing frequency and intensity of drought across much of our western rangelands should compel managers to PERMANENTLY retire allotments where grazing is no longer sustainable for the long term.