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Comments: Domestic cattle and sheep are currently authorized to graze about 8 million acres of National Forest Wilderness in the lower 48 states, mostly in critical watersheds particularly unsuited to grazing. Over 2.5 million acres of that total is within vacant (unused and unallocated) allotments. And while the original authors and supporters of the Wilderness Act of 1964 wanted to end grazing in Wilderness because grazing is fundamentally at odds with Wilderness, the politics at the time wouldn't allow it. Today the negative impacts of livestock grazing are much more clearly understood, including degraded water quality and soils, the spread of invasive weeds, destruction of riparian and other important habitats, reduced forage for and displacement of native wildlife, and much more.

The FS's proposed revision is the opposite direction the FS should take-instead of increasing livestock grazing on public lands, the agency should allow vacant allotments to be permanently closed and should protect Wilderness, other public lands, and wildlife by limiting, rather than increasing, inappropriate livestock grazing in National Forests.

It fails to hold livestock grazers accountable by not setting proper standards to adequately monitor conditions on the ground, and it excludes the public from some grazing decision processes. If all this weren't bad enough, increased 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.