

Data Submitted (UTC 11): 4/16/2021 5:29:58 PM

First name: Edward

Last name: Butler

Organization:

Title:

Comments: 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 complying 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 that conditions often cannot support increased, or even current, grazing levels. The Forest Service must develop policies ensuring that the agency will maintain authority for grazing management decisions and hold grazing permittees accountable for the impacts of their livestock 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, it must undertake a more comprehensive rulemaking process complying with the National Environmental Policy Act.