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First name: Genette

Last name: Foster

Organization:

Title:

Comments:

If the Forest Service wishes to amend its directives regarding Rangeland Management, it must undertake a more comprehensive rulemaking process that complies with the National Environmental Policy Act (NEPA).

Livestock grazing in National Forests significantly degrades our public lands, including millions of acres of Wilderness. Impacts from grazing must be fully examined and addressed through a transparent, public process that complies with federal laws, including NEPA. Recovery of imperiled or threatened species needs to be prioritized on National Forest lands and livestock grazing managed so as not to jeopardize species' recovery.

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. There have been highly publicized abuses of grazing permits with little or no consequence. It appears that the Forest Service has a clear preference for commercial interests and little interest in protecting wilderness and species that depend on wild land ecosystems.

Livestock grazing is fundamentally at odds with the mandate of the Wilderness Act that Wilderness remain "untrammeled." The Forest Service must not return to the excessive levels of grazing that was permitted in the 1960s. Even current grazing levels are often unsupportable especially in the face of severe drought conditions that are expected to remain or even increase with global warming.

For these and many other reasons, the Forest Service must drop its proposed Rangeland Management Directives.