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Comments: As a former USFS Range Management Specialist with nearly 15 years of experience (Custer National Forest and Caddo-LBJ National Grasslands) with a BS and MS in Range Ecology from the University of Montana, my thoughts on the proposed Directives are as follows:

The Rangeland Management Directives have the potential to significantly affect millions of acres of public land, that's right, PUBLIC Lands, including and especially 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 that complies with federal laws, including the National Environmental Policy Act, the Clean Water Act and the Endangered Species Act. There must be NO shortcuts to the full implementation of NEPA or any other pertinent legislative acts!

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. As grazing permits reach the end of their permit period, efforts must be made to retire those permits and return the land to its natural status, and that does not include livestock grazing.

The FS must not return grazing to the excessive levels permitted in the 1960s when it is clear conditions oftentimes cannot support increased, or even current, grazing levels.

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.

The recovery of imperiled or threatened species needs to be prioritized on National Forests. Livestock grazing must be managed so as not to jeopardize any listed 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, the Forest Service must undertake a more comprehensive rule making process that complies with the NEPA. This includes evaluation of short term and cumulative impacts of livestock grazing on America's public lands, especially Wilderness, sufficient time to allow full and complete public response to any new directives, and publication of the full written record of the NEPA process.

Despite the Trump Administration's intention and efforts, NEPA is STILL the law of the land and its processes must be followed to the full extent of that law. To do otherwise would and should subject the USFS to expensive and time consuming litigation.

America's public land belong to all Americans, not to a few fortunate private livestock owners who are fortunate to hold a permit. Grazing on public lands is a permit, NOT a right and must be managed as such. Livestock grazing is incompatible with other public use activities AND many of the natural resources on those lands. The administrative costs of management of grazing lands does not even come close to the charges for grazing. In effect, Americans are subsidizing that grazing. If the USFS wishes to continue to permit private livestock on public lands the minimum costs to do so on adjacent private lands should be required.