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Comments: The Forest Service must do the right thing for Wilderness, other public lands, and wildlife by dropping its proposed Rangeland Management Directives. These Directives have the potential to significantly adversely 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."

This leftover Trump administration proposal to increase grazing would not only fuel livestock grazing's contribution to the climate and biodiversity crises, but is also in violation of President Biden's Executive Order to implement the Thirty by Thirty Plan (to protect 30 percent of U.S. land and water by 2030 to save our climate, wildlife, federal public lands, and environment,) by sacrificing what could be protected lands to the commercial livestock industry.

Appallingly, 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.

Please incentivize the retiring of livestock grazing permits on federal public lands. Grazing in wilderness areas should be completely banned. It is absolutely devastating to allow livestock grazing on federal public lands such as national grasslands, forests, and wilderness areas, and then have U.S.D.A. Wildlife Services slaughter all wildlife that may interfere with the livestock. Further, it is incredibly destructive to chain federal public lands for livestock grazing. Livestock belongs on farms, not our federal public lands as they destroy the landscapes including streambanks and contribute significantly to global warming. This is disastrous in view of the climate and wildlife extinction crises and the need for biodiversity. Wildlife belongs on federal public lands as they are part of the landscape and enhance it. It was appalling for my family to see livestock grazing on the Buffalo Gap National Grassland on our visit to Badlands National Park in June 2019 instead of bison. Bison belong on these grasslands, not livestock. Bison live in harmony with other wildlife like prairie dogs, black footed ferrets, and burrowing owls which promotes healthy ecosystems.

Revisions to the Rangeland Management Directives should address the following:

- *Compliance with President Biden's Thirty by Thirty Executive Order to protect 30 percent of U.S. lands and waters by 2030.
- *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. Grazing in wilderness areas must be banned.
- *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 Forest Service should 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 and other federal lands, and livestock grazing managed so as not to jeopardize species' recovery.

Thank you for your consideration.