

Data Submitted (UTC 11): 4/16/2021 8:55:15 PM

First name: J. W.

Last name: Andes

Organization:

Title:

Comments: As a retired USFS range management specialist with nearly 15 years of experience on the Custer National Forest and the National Forests and Grasslands in Texas, as well as 15 years of fire management experience with the USFS, Fish and Wildlife Service, BLM and Bureau of Indian Affairs my comments are as follows:

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 "untrammled."

Livestock grazing on National Forests, including millions of acres of Wilderness, significantly degrades our public lands. And these lands are PUBLIC lands and belong to all Americans Impacts from grazing must be fully examined and addressed through a transparent, public process that complies with federal laws, including, but not limited to the National Environmental Policy Act, the Clean Water Act and the Endangered Species 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 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 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. It would also further add to the over all deficit grazing administrative expenses thereby taking away funds needed to address the myriad of existing resource and administrative problems the USFS faces.

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 rulemaking process that complies with the National Environmental Policy Act and the other Acts previously mentioned.

Compliance with NEPA is still the law of the land, despite the Trump Administration's intentions and efforts to nullify it's requirement. This means a full and complete evaluation of the natural resource, social, environmental, and legislative short and cumulative consequences of those directives. It also mandates a sufficient period to allow full public comment period and publication of the NEPA record. To do otherwise would and should subject the USFS to lengthy and expensive litigation.