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Comments: Thank you for taking on the task of updated the Rangeland Management Manual and Handbook after 40 years. This is quite a task and a much needed one. You are asking for comment and working specifically with proposals that focus on Agency deployment of grazing permit administration and rangeland planning/analysis requirements in keeping with Forest planning and CEQ direction.

It would have been helpful to demonstrate changes in the handbook by highlighting new wording and striking through removed text. It was hard to discern what was new and what went missing without searching long texts side by side.

Given the wealth of information and research concerning grazing and rangeland health as well as its effects on endangered species, diversity, and riparian areas, I would hope that the number one focus would be to permanently retire or close permit areas as they are vacated.

With recent problems on lands near the Bundy ranch and the disconcerting events near Malheur, it seems important to make it clear that leases and permits are not personal rights or personal property but privileges that come with immense responsibility and stewardship mandates. Should this be ignored or the area degraded by irresponsible practices, the permit should be quickly revoked if reparations are not immediately carried out.

An understanding of wildlife including predators on the landscape should also be built into the language of the permit. The livestock producer must take precautions and use best practices and non-lethal measures to prevent depredations.

I would also hope that you would support and encourage the voluntary retirement of grazing permits which would include permanent binding closures of said permit areas.
Over the past 40 years, development encroachment has made public lands more valuable as ecosystem resources and the benefits those provide. Rangeland should not be a priority on the public landscape. New direction should provide mechanisms to permanently close allotments as they vacate.

An analysis of allotments and how they affect wildlife corridors should be completed and recommendations made to reduce allotments on public lands that impede wildlife movement. Allotments should also be analyzed for their proximity to vulnerable native species like bighorn sheep and the Tule Elk in California.

Increasing allotment availability is ill advised. The weight of available science demonstrates that grazing brings great harm to ecosystems and diversity. Please do not cherry pick science to glean desired results. Grazing is harmful. It is quite simple. It has destroyed much of the west, depleted native grasses, trampled streams, and polluted waterways. Livestock grazing is a great contributor to global warming. Methane gas emitted by livestock is detrimental to the human condition. It is ill advised to increase grazing allotment availability.

It would be better to look for ways and provide direction for closing allotments as they vacate. are in violation of standards of stewardship, or gravely affect endangered species.

Certainly, the lowest hanging fruit is to not issue any new areas for permitting and to not re-open closed or vacated areas.

The consumption of meat is on the decline and its detrimental effects on climate change should diminish demand in the future. It is time to permanently close vacated areas and let them heal so they can be areas of diversity for

wildlife pushed into wildlands from human expansion. If you had the ability to reduce that I would highly recommend it, but I believe that is out of your jurisdiction.

Certainly ranchers that care for their allotments, follow directions, protect riparian areas, minimize conflicts with wildlife and respect the wildlife that share our public lands should be on their allotments as long as they wish. But ranchers should have the option to voluntarily sell their lease for permanent retirement. Many ranchers have loans on their allotments, so retirement or a reduced program is next to impossible. There are programs that assist them as they change their business model and move to retirement that does not leave them with poor choices or force them to sell their family lands.

Please also consider preservation of Sage Grouse within grazing parameters, considering fencing and other detrimental procedures that affect these birds.
Please consider the weight of available science and rethink many of these recommendations that assume grazing is beneficial. It has proven otherwise for over 100 years.

Thanks for considering my comments and for your service.