

Data Submitted (UTC 11): 4/17/2021 4:00:02 AM

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Organization:

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Comments: I am writing as an American who strongly supports full protection for Wilderness areas throughout our country. At this time, I am very disturbed because of the fact that domestic cattle and sheep are currently authorized to graze about 8 million acres of National Forest Wilderness in the lower 48 states, and this activity is authorized to occur in mostly critical watersheds that are 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, this did not occur. 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.

I am writing concerning the Forest Service's proposed revisions, the Rangeland Management Directives, would expand grazing across our National Forests and within Wilderness by directing vacant allotments to be fully restocked and by returning grazing to the excessive levels permitted in the 1960s, despite conditions that cannot support increased grazing. It is very important to understand that these 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 "untrammeled."

This is the opposite direction the FS should take because instead of increasing livestock grazing on public lands, the agency should allow vacant allotments to be permanently closed and should protect Wilderness, other public lands, and wildlife by limiting, rather than increasing, inappropriate livestock grazing in National Forests.

Unfortunately, these proposed Forest Services's proposed revisions which are leftover Trump administration proposal poses other problems as well. They fail to hold livestock grazers accountable by not setting proper standards to adequately monitor conditions on the ground, and they exclude the public from some grazing decision processes. Please realize that 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. 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 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.

It is very important to understand that the approval of increased grazing would not only fuel livestock grazing contribution to the climate and biodiversity crisis, but runs directly counter to the Biden Administration's 30 x 30 land conservation agenda by sacrificing what could be protected lands to the commercial livestock industry. At this time, I thank the Forest Service for your consideration of my letter. I strongly urge the Forest Service to please direct all needed government action to protect our Wilderness areas, other public lands, and wildlife by dropping its proposed Rangeland Management Directives.

Sincerely,

Jean Marie Naples, MD-Ph.D.