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Comments: 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.

The FS's proposed revisions 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. This is the opposite direction the FS should take-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.

This leftover Trump administration proposal poses other problems as well. It fails to hold livestock grazers accountable by not setting proper standards to adequately monitor conditions on the ground, and it excludes the public from some grazing decision processes. If all this weren't bad enough, increased 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 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 "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.
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.
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.
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.