

Data Submitted (UTC 11): 4/17/2021 10:05:34 PM

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Comments: I am a retired Forest Service hydrologist/soils specialist and worked on range project during my professional career and as part of my academic research. I urge you to drop your proposed Rangeland Management Directives and to leave the existing vacant allotments vacant and then close them permanently. I urge this based on the following reasons:

1. Many of these areas have been vacant for a number of years. As such they present a unique opportunity to serve as Climate Change Reference areas in which changes in active allotments to streams and riparian and upland vegetation, water quality, fish and wildlife habitat quality and complexity and the use of these areas by wildlife can be compare. Many forests have vacant allotments scattered over their districts which allows for a variety of conditions to be evalute. Given the urgency of climate change and the Forest Service's own recent Climate Vulnerability Assessment maintaining these areas as Climate Change Reference areas is critical to making management decisions.
2. Some of these areas are not really suited for livestock grazing given the rugged terrain. This makes the use of herding techniques, which minimize impacts to the resources and increases protections for livestock in areas with wolves, bears and cougars.
3. The grazing pressures in the 1960s up until the early 1990s was extremely high and the resource damage huge. Recovery of riparian areas has been slow given the magnitude of the changes that occurred. I have personally observed how quickly well-vegetated stream banks can become trampled and bare once livestock are allowed into an area and the slow, but steady recovery of that vegetation when livestock are removed. We cannot afford to set these key stream/riparian areas back given the increased concerns about water quality and stream flows and fish and wildlife habitat.
4. We know better. We have learned much about our public lands as a result of detailed and extensive studies. The agency prides itself on using best available science and again this is why keeping these areas as Climate Change Reference areas is so important.
5. The agency supports use of best available science and is the only way to maintain its credibility with the public. Sidestepping NEPA thus does not serve the public or the agency.
6. In addition to keeping existing vacant allotments empty, they should be permanently closed so that they can serve biodiversity needs and water resources needs to help the agency do its part to prepare for climate change.
7. Voluntary allotment retirement should be prioritized and encouraged. Currently livestock management via the pasture system does not allow for the appropriate level of land management needed to protect T and E species, stream and riparian health. The pasture system also puts livestock in conflict with wild carnivores because they end up spread out and thus vulnerable to predation. In addition, often a few remain on an allotment after the season being missed by riders. These become even more vulnerable to predation or death with the blame often being put on wildlife rather than poor livestock management.

In conclusion, in the face of climate change, there is a need to get our national forests in as healthy as condition as possible. Livestock grazing impacts streams and riparian areas, key areas for fish and wildlife and downstream stream uses and thus should not be increased but rather decreased until we have livestock grazing on landscapes in which they can be appropriately managed using herding techniques.

I urge you to your proposed Rangeland Management Directives, keep the vacant allotments not only vacant, but permanently closed and study them as Climate Change Reference areas,

Thank you.