

Data Submitted (UTC 11): 4/18/2021 12:20:10 AM

First name: Susan Kelly

Last name: Ambler

Organization:

Title:

Comments: I am adamantly opposed to expanding grazing rights within Wilderness Areas. In fact, livestock grazing should be eliminated from all Wildernesses. Allowing livestock grazing within wilderness areas is totally incompatible with the defining principles of these areas. Furthermore, I have seen first hand the destruction livestock grazing does. Grazing is NOT a benign activity.

Furthermore, it is clear that protecting the integrity of our wild lands is one of the best things we can do to mitigate the detrimental effects of climate change.

Specific points include:

- 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.

Thank you for your attention.