

April 16, 2021

U.S. Forest Service
Director
Forest Management
210 14th Street SW, Suite 3SE
Washington, D.C. 20250-1124



Re: U.S. Forest Service Rangeland Management Directives #ORMS-2514

On behalf of the Montana Stockgrowers Association (MSGA), the Montana Public Lands Council (MPLC), and the Montana Association of State Grazing Districts (MASGD), we appreciate this opportunity to provide comments on the Rangeland management Directives #ORMS-2514.

Our organizations represent landowners who run livestock on private, state, and federal lands in Montana and have a significant and long-standing commitment to long-held traditions of resource management that keep lands and waters healthy and strive to improve range resources over time.

The updates to the directives are a welcome in modernizing the agency's procedures. Our organizations have worked closely with the Public Land's Council (PLC), the National Cattlemen's Beef Association (NCBA), and the American Sheep Industry Association (ASI) to clearly line out the sections of the directives that we feel need further clarifications, definition refinements, or additional information. We ask that you please reference those comments regarding those specific callouts. Each issue is addressed in its entirety in those comments.

We feel that it is important to recognize the work the agency has done regarding multi-generational livestock operations. The efforts to increase and ensure continuity of operations and improvements to succession authorizations will provide long-term certainty for multi-generational families who are working to keep their family's operations sustainable for generations to come. There is opportunity to additional refinements regarding timelines that we hope the agency will take into consideration.

Furthermore, we ask for further work and clarification surrounding the agency's acceptance of the use of leased property qualifying as base property for a term grazing permit. The ranching industry continues to evolve. Clear direction noting if the agency "will/may" consider leased property, in specific cases, when considering eligibility for grazing permits would be beneficial.

MSGA, MPLC, and MASGD would like to thank you for your consideration and understanding of the impacts these management directives will have on livestock producers and public land grazers and look forward to continued cooperation and collaboration.

Sincerely,

A handwritten signature in black ink that reads "Raylee A. Honeycutt". The signature is written in a cursive, flowing style.

Raylee A. Honeycutt
Director of Natural Resources | Montana Stockgrowers Association
Executive Staff | Montana Public Lands Council
Executive Staff | Montana Association of State Grazing Districts