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First name: Wes

Last name: Obrigewitch

Organization: Medora Grazing Association

Title: President

Comments: The Medora Grazing Association hereby express our support for all comments submitted by the North Dakota Grazing Association on the proposed Rangeland Management Directives.

Our Association's specific concerns involve changes to the Standard Grazing Agreement, FSH 2209.13, Chapter 20, 23 - exhibit - 02 (Standard Grazing Agreement only for Grazing Associations Operating on National Grasslands in R-1). The proposed Standard Grazing Agreement (SGA) differs from the SGA signed by both myself, as MGA President, and the Dakota Prairie Grasslands (DPG) Supervisor, William O'Donnell on February 12th, 2020. The signed DPG SGA was the end result of many weeks of meetings, negotiations and valuable time spent on finding common ground on an agreement both parties could be satisfied with. Furthermore, during the writing of the Draft Directives, the lead range specialist with the Washington Office rangeland management group stated that the DPG SGA would go into the Directives - word for word. This has not occurred and the Medora Grazing Association asks that the proposed SGA (23 - exhibit - 02) be corrected to read like the original, agreed upon, DPG SGA.

Another concern is that the proposed changes aim to put grazing on National Forests on the same level as grazing on the National Grass lands. We do not believe any part of the Handbook or Manual applies to the Dakota Prairie Grasslands other than what is contained in the Standard Grazing Agreement. The proposed Handbook and Manual is not very well organized, allowing for contradiction and confusion in determining what applies to the National Grasslands.

For what most certainly is not the first, nor, frustratingly, the last time, the Medora Grazing Association requests that the Forest Service develop a set of rules, regulations, and policies specific to the National Grasslands, in a separate chapter and with input from the Grazing Associations operating on the National Grasslands.

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