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First name: Melvin

Last name: Gill

Organization: Gill Family Ranches, LLC

Title: manager

Comments: Gill Family Ranches, LLC supports the Idaho Cattle Association and Public Lands Council comments regarding proposed changes to the Forest Service Manual (FSM) 2200, Forest Service Handbook (FSH) 2209.13, and FSH 2209.16 that affect permitted grazing on forest and grassland units of the National Forest System.

Our family has owned deeded land adjacent to and grazed livestock on these lands BEFORE the creation of the USFS and grazing permits. The Gill family has held a grazing permit on the Cow Creek allotment, Nez Perce National Forest, Region 1, since the creation of the Forest Service grazing permit system. The first documentation we have of a permit issued in the Gill name, is dated 1908, based on prior use of this area.

We have seen how beneficial grazing is over the years. Grazing is both a permitted activity, as well as a tool to improve resource conditions, and can be applied both without conflict.

The inconsistency of Forest Service management, across Regions, Forests, and Districts, to properly recognize and manage grazing permits by working with permittees on effective grazing practices, as defined by specific allotment conditions and limitations (forage conditions, timber harvests, roads, trail access issues, recreation issues, unlawful grazing by hobby farmers) has been a major problem.

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