

Data Submitted (UTC 11): 3/12/2020 11:59:22 PM

First name: peter

Last name: oddonetto

Organization:

Title:

Comments: i, promote and support all new USFS Range Management Specialists hired go through a background check for any affiliations with organizations whose platform in any way is anti-grazing. i suggest the culture of the USFS embrace partnering with the Allotment owner to maximize the Sustained Yield of the forage allotted to the rancher, and in compliance with the Sustained Yield portion of the MUSYA.

i support the evaluation of vacant allotments until there are no vacant allotments, and also believes that this process should be completed as soon as possible and not be limited to one allotment every two years.

Additionally, i believe that the priority outcome should be to grant available allotments to current or new permittees, and that the second option should be a conversion to forage reserves to improve resource management flexibility.

In any case, i oppose the closure to permitted grazing, in whole or in part, of vacant allotments. This is even if there may be a temporary lack of market demand for the permit, as markets rebound and a permanent closure would violate the requirements of 16 U.S.C. § 529.