Data Submitted (UTC 11): 2/13/2021 12:40:47 AM
First name: M.T.
Last name: Anderson
Organization:
Title:
Comments: In section 11.52 it states: On Form 10e,
the applicant must waive exclusive grazing management of the private lands involved to the United States for the term of the permit in order to determine livestock numbers and grazing season for the entire allotment (the permittee accepts the FS determination of capacity for the private lands), as well as for allowing access to the private lands necessary for allotment administration.

As a land manager who manages an On/Off USFS allotment, I have serious concerns in regards to the language stating that the private landowner must waive exclusive grazing management to the USFS. That is a violation of private property rights and if the the USFS feels that they must manage private land, then they should likely move the fence and remove all USFS ground from inside private land pastures. It is totally unacceptable for the United States to state that a private landowner must waive exclusive grazing management of private land to the USFS.

In regards to Section 12.18. I do not feel it is okay or appropriate for NGO's or NPO's to be able to hold term grazing permits. Should not be allowable

In regards to Section 15.8. It is not okay for private land to be waived to USFS for "exclusive grazing use".