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Comments: To Whom It May Concern:

We commend the USFS for recognizing ranching as a multi-generational family business. Ranching is a source of income, but more so a way of life; a tradition that is passed from generation to generation. In many families, placing their assets in an LLC for protection and estate planning has become a necessary part of the business. While we applaud the USFS for allowing children and/or grandchildren to run up to 50% of the older generation's permitted number for grazing, there is a problem when the family's ranch is also in an LLC.

Not all families are prepared to place their children and/or grandchildren on their LLC for various reasons, as each family's situation is unique.

We ask the USFS to recognize the distinction between corporate LLCs and family operations who happen to have an LLC in Chapter 10 Section 12 of the Grazing Permit Administration Handbook.

Instead of a blanket policy, we ask that you rely on the competence of the local District Ranger to determine if the LLC is a family business or a corporate entity. It could be as simple as adding an addendum on the Annual Operating Instructions certifying that the people running up to 50% of permitted numbers are indeed children and/or grandchildren, to be reviewed annually.

If the USFS' true intent is to help in succession planning and transitions in family operations, then this is a commonsense solution to a problematic issue.

We appreciate your time and consideration. Thank you.

Sincerely,

Ben and Becky Reutter