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Organization: Cottonwood Cooperative Grazing District

Title:

Comments: April 16, 2021

To Whom It May Concern:

The Cottonwood Cooperative Grazing District, consisting of members who are ranchers in southwest South Dakota, would like to bring to your attention some concerns with the proposed Rangeland Management Directives # ORMS-2514.

The Cottonwood Cooperative Grazing District was incorporated in 1945 and is a member of the Association of National Grasslands. Historically, the Grazing Agreements made between the USFS and grazing associations, have been uniquely tailored and negotiated for each association and its members. This has been a commonsense practice since each association's need are as unique as the land on which their livestock graze. The new proposed Directives appear to be a strict one-size-fits-all method of management that allows little to no room for associations to negotiate terms and conditions of the Grazing Agreement.

We adopt the comments made by the Association of National Grasslands concerning the proposed Directives and strongly recommend a return to local oversight by the local District Ranger and Grazing Associations, who may negotiate and determine what is best for all concerned parties. We cannot in good faith sign an "agreement" that allows the USFS to arbitrarily change, cancel, or suspend grazing rights without due process.

As you know, ranchers are stewards of the land. If we were not, we would be out of business. We plan ahead for grazing, pasture rotation, culling the herd, and a myriad of other details too long to list to ensure the health of the animals and land on which they graze. Building a quality ranch takes time, sometimes generations. We would like to work with the USFS to continue that tradition. In this area of SD, we rely on grazing rights as part of pasture rotation. If ranchers lose their grazing permits, there are no other options for grazing, as all other land is privately owned and/or leased long term. The result of this is selling down your herd that has taken generations in which to build the genetics. You cannot just go to the sale barn and replace the quality of the cattle you were forced to sell.

We would also like to bring to your attention that some families have their ranches placed in LLCs for protection and estate planning. We encourage the USFS to differentiate between LLCs who are corporate entities and family operations who happen to have their land protected by an LLC. We are confident that the local District Ranger knows the difference and it would be a matter of filing simple paperwork to certify that only children and/or grandchildren are running up to 50% of the herd in the family operation.

We would greatly appreciate the opportunity to have a voice in the creation of the proposed Rangeland Management Directives, assuming that these Directives are indeed a proposal and not a take-it-or-leave-it set of Directives that violates the original purpose of the Grazing Agreements, which was to enhance the stability and economy of the local community, and to improve the functionality and productivity of the National Grasslands. We appreciate your consideration of our concerns. If you would like to contact members of the Cottonwood Cooperative Grazing District to discuss this further, we would be happy to visit with you.

Sincerely,

Members of the Cottonwood Cooperative Grazing District, Edgemont SD