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Comments: After reading both the FSM and FSH, I have several comments as well as questions. One is who decided that 10 years is the magic number for everything. I will start with the FSM. 2201.1 #17 - What does the USFS consider reasonable compensation and what kind of proof does the permittee have to show to prove they constructed or maintained the improvements? 2201.3 #1 states the greatest good of the greatest number in the long run. How is prohibiting or limiting grazing helping this statement. How is only listening to environmental groups accomplishing this? Allotment owners/permittees whatever you want to call them are the true stewards of the land. If we don't manage our resources correctly then we hinder our operation. In keeping with multi-use, we are the reason that there are trails for recreational use and water developments for wildlife, livestock, and companion animals. Some USFS personnel need to reevaluate how they are managing resources. They need to rethink whether their actions and decisions are in line with the greatest good of the greatest number standpoint. From an allotment point of view, this is not being done. Personal agendas of USFS personnel seem to be overriding these directives especially in the San Juan National Forest (SJNF). 2201.3 #5 seems to be ignored by USFS personnel altogether and #6 is says they are supposed to be valuing heritage. It feels like heritage is being shoved to the side to please the loud recreational users and environmental activists. We tend to be quieter and go about our business to keep things on an even keel. 2202 #4- states that promoting stability for communities that depend on rangeland resources for their livelihood is a priority. Current USFS decisions and actions seem at odds with this directive. 2203 #2, #6, #7, and #8 - These lay out policies but who is making sure they are followed. There seems to be a disconnect with those that updated these and actual personnel in the many forests in the NFS. #8 was not being accomplished and since the pandemic it is non-existent. Improvement of this policy needs to happen. Coordinating and cooperating are not adjectives I would use for our experiences with USFS personnel. Dictatorial and uncooperative has been more our experience or ignoring all together. #12- we have been told that resolving conflicts is not their job. They seem to cause more conflicts than they resolve. #14 & #15 - SJNF personnel need to apply these policies more. It would seem they do not know how or want to. The Forest Service Manual is next. 2230-2 #3 - I would like to know who is ensuring this consistency? We haven't even experienced consistency between our local personnel in one office let alone across the whole system. #4 & #5 - This also depends on the personnel and is not the same from year to year. With the latest SJNF personnel, #5 is not really occurring. Communication is very limited or not existent with information not forth coming in a timely manner. We did not know about these directives until a week before the first comment deadline in February. 2231 #1 - Coordination between the multiple uses is not being done. Permittees are blamed for everything. Campers, hikers, bikers, and outfitters are never blamed even when the permittee tells USFS personnel. 2231 #4 - It seems that everyone is trying to discontinue rather than continue the presence of ranches and farms. Even though, it has been proven that grazing helps mitigate fire and livestock makes trails more passable. We also provide open space with our commensurate property and make water available for all. Recreationists are given more credence that permittees by everyone it seems even with our proven benefits. 2240.3 #7 - We contribute more than our proportionate contribution of money, labor, and material to make our allotment viable for our livestock operation. #8 - We have not seen this in our documentation accept what we turn in on our year end report. #9 - How exactly does USFS hold titles to permanent rangeland improvements especially when proportionate contribution from the USFS was not provided. 2272 #4 - Why are these due in October when the year is from March to February? Chapter 10 - 11 Why are base properties required? If we have no rights to the USFS land, why do you require anything but livestock ownership? 11.4 - What does USFS consider timely action? 12.17 - At the beginning of this Chapter it says USFS employees have not done legal training yet you advise people to consult with the RO Range Management Specialist for legality and eligibility. I do not think they are qualified to answer these legal questions. OGC - Yes, but not Regional personnel. 12.22 - Why do you exclude LLC's from the children/grandchildren livestock ownership. Some LLC's don't add the children as members until they start making decisions and providing financial aspects to the operation. Although, they start building a herd early in life to carry on the heritage they

are not part of the day to day operation decisions. 12.5 - The last sentence in this section is very important and should be emphasized to USFS employees with those that have a personal agenda that is in conflict with this.

14.1 - What is considered sufficient notice by USFS personnel? And what proof of this notice is required? Who determines what sufficient and timely notice is? 14.3 - What is the list of supporting documents we should have? 14.37 - It seems that timely is required by permittees but is not reciprocated by USFS personnel. 14.5 - We are required to fill these out but assistance is not provided on how to fill them out. 15.2 Exhibit 01 & 02 - How often are these updated? We provided GPS locations for our range improvements to USFS and have never seen an updated map with that information. 16 - What if the AOI is the first time the permittee is aware of the change? Why are these not appealable? 16.1 - Authorized officer must strive to obtain permittee agreement but it is not required. How is this fair? This makes it a he said/she said kind of ordeal. It would seem that you could avoid modification appeals if you just made the first part of obtaining permittee agreement mandatory. Is Exhibit 1 in this section a new document. I have not seen this before. 16.11 - This section says there will be discussion with the permittee and a letter of the discussion will be sent to the permittee. You clearly state before that this was not necessary. Consistency not contradiction is the key. 16.13 - Every time you say the permittee doesn't have to agree makes it sound like authorized personnel can make decisions with not input from the permittee. This does not promote good relationships between the parties involved. 16.2 - Are higher level USFS personnel monitoring to see if lower level employees are practicing common sense, experience, and a degree of flexibility. Our current personnel has numerous times indicated a lack of flexibility. Some violations we have experienced have never been communicated to us until the end of the year report. This provided the documentation but it is usually months after the initial violation that could have been corrected at the time whether it was minor or not. There is a definite breakdown in communication between departments at the local level. 16.34 - very rarely do we see USFS personnel, let alone have them do compliance inspections with us. Reason given is they do not have the personnel to do this. 16.36 - Field inspections are few and far between and rarely done with the permittee. 2209.16 11.12 #8 - Contrary to this formula - our cattle graze on greater than 60% slopes all the time. This is not accurate. 12.4 - Communication is the key. USFS personnel in our forest are not very good at promoting this. We have had a lot of change in our personnel. New personnel is not introduced sufficiently and at this time we are not sure who we talk to. When talking to them, they don't prepare by looking at the file before the conversation. We have to fill in things that are already in the file and time is wasted giving background. It feels like we have to do their job for them and promoting a good working relationship does not seem like a priority. They often wait until year end reports to share or inform us of instances of non-compliance. Chapter 60 - 62.1 #6 - are we allowed to see the inspection records documenting compliance? Chapter 90 - With the reduction in personnel, How is the LMP managed with no actual USFS monitor data? If there is data do we get to see it? 94 - AOI meetings are not open to the public and that is fine, but we have found that a third party witness needs to be present. 95 - Who does this monitoring? 95.3 - What if they have no training and don't know the standardized methods? USFS has the final responsibility but continue to ask us to do their job although we don't have the training. I don't know maybe they don't have the training either. If that is true, maybe hiring criteria needs to improve. In closing, although I agree things need to be updated, I am skeptical as to whether this will improve the way USFS personnel in our forest will interact with permittees. Improved communication, respect for our heritage, and understanding of our importance in the multi-use NSF system would definitely encourage and strengthen relationships.