

Data Submitted (UTC 11): 4/16/2021 11:11:55 PM

First name: Veronica

Last name: Edoff

Organization:

Title:

Comments: Dear United States Forest Service,

These are my comments to the Rangeland Management Directive Updates

1. A very big concern with livestock branding or lack of it in some cases. Why are bison not required to be branded? FSH 14.33 application for a term permit MUST include a copy of a certificate of brand registration. If a certificate of brand registration is required why not require buffalo to be branded? How is a term permit even granted for buffalo if there is no brand certificate?

Privately owned buffalo are considered livestock in the state of S.D. and the state does register buffalo brands. I suspect other states have similar statutes so buffalo owners could hold a brand for buffalo. Also if an allotment is validated with cattle and then switched to buffalo the brand certificate should also be required to be changed to a buffalo brand. Term permits should not be held with a cattle brand if it is changed to a buffalo permit.

A neighboring ranch has an allotment they graze unbranded buffalo on. A few years ago they pastured buffalo for someone else. Were these buffalo grazed on their allotment? Recently they started managing property that borders their private land and their allotment. There is a herd of unbranded buffalo on this property also. Are some of these buffalo grazing their allotment? Without a brand who knows? The Forest Service needs to withdraw the sentence- Follow state statutes regarding requirements to mark or brand buffalo. An ear tag does not prove ownership. Domestic buffalo should be held to the same brand regulations as other livestock with the exception of sheep.

2. Issuance of Term Grazing Permits

The sentence-permits shall not be issued if permittee deletes, alters, or indicates in writing that any terms or conditions is unacceptable- should be removed. The Forest Service draws up the permit with no input from the allotment owner and then expects them to sign it. The National Forest Management Act states "all present and future permits contracts and other instruments shall be subject to valid existing rights." Allotment owners should be able to indicate they are reserving their valid existing rights.

3. Private land owners should never be required to waive exclusive grazing management to the Forest Service. Management of on=off may need to be case by case basis.

4. At the beginning of the term grazing section the statement is- Grazing is a privilege and not a right. Is the Forest Service using scare tactics here toward the livestock owners? It seems to me some of these directives are written to give the Forest Service all power and control. My #2 and #3 comments are good examples. The Forest Service should work in a cooperative manner with the allotment owners. This would be beneficial to both parties, and by the way the definition of privilege is an exclusive right.

5. I don't believe NGO's and NPO's should be allowed to hold term grazing permits. Depending on the circumstances this could have a detrimental effect to the economic status of the community where the grazing allotment is. I do not support the closing of any allotment. Grazing is a part of multi-use and should continue. The Forest Service should make every effort to make available vacant allotments to interested livestock producers for term grazing. The Forest Service should also actively seek out ranchers to apply for permits that are waived with no preferred applicants.

I support no third party buyout or requests for allotment closures. Forest Reserves should only happen if there are no qualified applicants for a term permit.

6. I am pleased to see the reference to the 1980 Congressional Grazing Guidelines in regards to rangeland improvements within congressionally designated wilderness areas. However proposed wilderness areas should continue to be managed in the same way as before the proposed designation. It has been my experience that proposed wilderness areas are held to stricter management than congressional designated wilderness. I have been told this by Forest Service rangers several times. Water improvement would greatly enhance and help with distribution of livestock on our allotment, but because of the proposed designation it is not allowed.

Thank You for this opportunity to comment on the proposed Rangeland Management Directives

Respectively,

Veronica Edoff