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First name: Fidel

Last name: Gonzales

Organization: Gonzales Cattle LLC

Title: Permittee

Comments: 17.21 - Non-use for Resource Protection Primarily Due to Drought or Other Climatic Conditions

- Form FS-2200-26 for resource protection should provide the option to waive a term grazing permit to another permittee who can validate livestock numbers and prove base property without the sale of the original permitted livestock or base property tied to the permit. This will allow for permittees to further reduce impact to operations and follow the policy guidelines for livestock validation and base property ownership. Policy should be implemented the same if there is a decrease in livestock numbers due to any sort of resource protection.

## 12 - ELIGIBILITY AND QUALIFICATION REQUIREMENTS FOR TERM GRAZING PERMITS

There are only three exceptions to ownership by the same precise legal entity:

Option Needed:

Two term grazing permit can declare the same base property when the two term grazing permits complement each other (e.g. a summer grazing permit and a winter grazing permit).

### 12.21 - Base Property Ownership Requirements

-Where base property is jointly owned (undivided interest) by several individuals, all of the owners must apply for the term permit as one entity. In other words, an individual's permit application will be rejected if the base property identified therein is jointly owned and the other owners are not listed as applicants for the permit. The name on the permit will be stated the same way as the land ownership is recorded at the county courthouse.

The above policy needs to be appealed. Where base property is jointly owned by several individuals, an individual owner may qualify for a term grazing permit with their individual share of the land (if it meets specific base property requirements). It is not the governments job to help settle legal disputes amongst land shares. Yes, shares are drawn out on deeds , living wills etc. but not all owners should have to be on the permit especially, if they are not the ones doing the upkeep of maintenance, improvements etc. It is already in policy that the permittee needs to contact the U.S Forest Service for any changes in the base property.

### 13.1 - Changes in Ownership with Waiver

-New Option- Permittees have the option to waive their term grazing permit to another qualified entity or individual who owns the number of livestock required to validate the permit along with base property requirements. This disregards the need for a sale for base property or permitted livestock to waive the permit to another. In addition, this eliminates the socio-economic impact to livestock producers that would be incurred from owning additional land that does not fit in their operation. This also allows adaptive management flexibility for those permittees who has been impacted by environmental factors that sold off their herd and their primary residence is their base property. This also reduces health concerns amongst livestock by preventing other permittees from negatively impacting the genetic integrity of other herds on shared allotments with livestock that are of lessor quality. This would also reduce noncompliance issues by inheriting wild livestock on National Forest Lands.