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Comments: Dear Comment Reviewers: We would like to thank you for the opportunity to make the following comments on the proposed Rangeland Management Directives: 1. There were a few good things we ran across in this exceedingly huge production, that was developed in some smoke filled room over a period of many years, with no public input. We do like the determinations that a. Grazing permittees can spray noxious weeds if certified and the CP program pay for the chemicals--that will allow CP funds to be stretched further. b. The F.S. will maintain wildlife fences and c. Cattle guards and their included wings are also F.S. maintenance (believe it or not, that has been a point of debate and confusion in the past). 2. Much of this production seems based on tyranny and a means to cement F.S. control of neighboring deeded and state leased lands. We don't believe 40 acres of National Grasslands in a 7,000 acre pasture should allow the F. S. to have "exclusive grazing use" control of the entire pasture. Many of these directives do not follow the spirit or intent of the Bankhead / Jones Act, from which today's National Grasslands originated. 3. Another example of these directives is found in chapter 90, pages 20 and 21, where rules for AOI meetings are dictated. To be discussed are certain business matters concerning permittee eligibility to graze such as: financing, business organization, livestock ownership and confidential information. What limits will there be, if any, on what financing and confidential information will be requested (demanded). A lot of this will depend on the individual official making these requests (demands). 4. In chpt. 20, pg. 80 The association is to "describe how grazing privileges will be distributed fairly and equitably to all qualified applicants" on Association owned and controlled lands. Is this based on the new push for "equity" -vs- equality, where end results are determined by some anonymous elite brain trust? 5. In Chapter 10- 13.4, in the discussion on "unauthorized livestock", it is stated that the stock may be impounded and/or disposed of. "Disposed of" - wow, does that mean they can just be killed, or what does disposal consist of? 6. Several places in this tome stress the omnipotence of the F.S., and that any disagreements will be resolved in favor of the F.S., and in many cases it is claimed that there will be no rights to appeal. 7. Probably our biggest concern is with the differences between the Grazing Agreements that examples are given of in Chapter 20 (e.g.: page 31 -vs- page 41). Some of the Agreements appear more dictatorial than others, when the descriptions under LANDS and DOCUMENTS are some of the things that should be more universal. We probably spent more time arguing on the description of "Waived Lands" during the negotiations on our last 10 year agreement than we did on the remainder of the Agreement. Now we see that isn't even included in some of the other Association's Agreements. We were basically told to take it or leave it. We would wholeheartedly agree with the Association of National Grasslands Conclusion in their comments, and also believe that until meaningful hearings with affected Associations are held on these "directives", they should be withdrawn. Many years passed by without an update, and one should not be rushed through just to have something new. Thanks again for this opportunity to comment. Sincerely yours, Jim Darlington, Secretary/Treasurer Inyan Kara Grazing Association