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Comments: To Whom It May Concern,

Routinely, the USFS addresses USFS Allotment owners, as "permit holders", which implies that the USFS is consenting to permit ranchers to graze the allotments and that the USFS can revoke that permission at anytime. USFS Land Management Plans are developed with special interests groups, NGOs and other so-called "stakeholders", then presented to allotment owners often with the intention of altering, decreasing or removing cattle grazing from certain allotments without written permission or remuneration of allotment owners. While land management plans are not wrong, they do not take precedence over or supersede what congress has passed into law.

Under the Bankhead-Jones Farm Tenant Act of 1937, the law authorized farmers to purchase land from the federal government along with the grazing and water rights of neighboring federally owned land, in a split surface estate ownership. Allotment owners pay annual taxes, a legally enforceable obligation, on their portions of the split estate, which are exclusive to the value of the grazing rights and access to the water in the allotments. It's not permitted use, it's legal ownership of the grazing and water rights. The incorrect term used by the USFS has been successful in pushing some ranchers off land that they have a legal right to access and utilize for cattle grazing, whenever the USFS identifies an endangered species or so-called "higher and better use" plan for that allotment.

Allotment owners and the USFS are not enemies, nor are ranchers who have a legal right to these allotments, serfs of the United States Government. In 1891 Congress created USFS lands to provide a water and timber supply for the people, and settlement opportunities of the land. It was not created for recreation or aesthetics purposes like the US National Parks Service, or species collection and preservation for select special interests groups with specific private and government funding. It would be prudent to not violate the rights of allotment owners for the purpose of satisfying parties who do not have legal rights in matters concerning these grazing allotments.

Best regards,

Elisabeth Erickson-Noe