

Ref. #	Summary of Comments from Public Meetings held on August 11, 12, 13, 2008	Do you Support the Lease Application Proposal?
1	I hope this proposal process helps the cash flow	Support
2	I support the bidding process to operators who are not doing a good job but good operators should be rewarded.	Support
3	I feel you should postpone this application process for 1 year.	Support
4	I am in favor of the grazing preference to current lessees in renewing leases. Lessees should be given credit for improvements made on state lands and should be given credit for being good stewards of state lands and be able to use these credits towards the purchase of state lands when sold. I would like to see the lessees who take good care of the land have some sort of advantage over those who just take what they can off the land. I think state sponsored financing would be good for the state and purchaser also. Leases should be longer – comparable to BLM leases. Small isolated parcels should be sold, current lessee should have first right of refusal	Support
5	I feel that the meeting was informative and well organized (Soda Springs Meeting.	Support
6	I think trading state and private land is a great idea. The larger the tract of state land, the more interest there will be for bidding. Therefore, more revenue for the state. I believe land trades for private and state ground will cause less conflict than selling state ground. There should be some context on how state leases are based on dollars. Some state ground has lush green meadows and some have hardly any dry matter for an animal to survive on. It seems to me that the AUM rate should vary on a lease-to-lease basis depending on the value of feed and water availability.	Support (with recommendations)

11	I feel if IDL wants to increase returns they have to offer incentives or credits for improvements, seeding, brush control etc. These improvements would require more stability for the lessees with 25 to 30 year terms. Lessee should have a 1 st right of refusal for lease renewals or purchases.	Support
15	We appreciated the manner in which you represented this proposal at the Orofino, ID meeting. We do support it and look forward to seeing the final conclusion. Please send us a notice of the next meeting directly at the following address. We are ranchers that run our cattle on Potlatch and State ground in the summer, along with others in our Association.	Support
16	Lessee would be willing to entertain the first right of refusal if state decides to sell the land parcel. The land parcel is landlocked on four sides by the private property.	Support
18	Our company supports the proposed grazing lease application process. There is one concern that should be considered that was not brought up at the public meeting held in Nampa. The contested lease grazing management plan submission before auction is held is a good idea. However, it may not have the effect that was envisioned. It would still be possible for any otherwise unqualified person or entity to provide a grazing plan that meets all requirements and standards required by the Department. Then if this entity was successful in acquiring the lease there is no real immediate penalty if they do not graze animals or otherwise perform to the plan. Without annual inspection of the property the Department would not know if animals were grazed on the land or not. Clearly, if the Department knew they were not performing the lease would be subject to cancellation. The problem is “knowing”. Recommended solution would be to require annual inspections for the first five years of grazing lease that are acquired by a new entity or person.	Support (with recommendations)
20	If it works for you – it works for me.	Support
22	The Land Board needs to go to the Idaho Legislative and request changes in law/constitution to: Allow current lessees to match high bid to give stability to ranch operations, Provide a mechanism to recognize that some state land should be utilized as wildlife, recreation, or other uses that doesn't generate \$\$ but is a higher and best use.	Support
24	We need to use state lands for the best use we can and not lay them idle or sell them	Support

25	<p>One size doesn't fit all. State lands vary from very good to very marginal. I don't think it should all be assessed with the same value. Some state lands are managed by the BLM or Forest and aren't worth the cost of building the fence to separate it out.</p>	Support
26	<p>Lessee should have first right to match any other bid for the lease. The grazing lease has more value than just grazing, i.e. value to the overall operation adjusting cattle numbers over a short period of time, loss of income. Losing a grazing lease also devalues the base property. Consideration should be given to the lessee for maintenance due to recreation and access to these lands which the lessee cannot control i.e. weeds, erosion, etc</p>	Support
28	<p>I have some concern in regard to the four significant changes from the existing expiring grazing lease process. They are as follows:</p> <p>Review of Expiring grazing leases. State land that is included in a management plan that covers other ownerships within a grazing unit has an intrinsic value to the functionality of the unit. I am concerned that the personnel conducting a file review will not have enough knowledge of the lessee's operation to assess the importance of the parcel of state land to the functionality of the grazing unit and the integrity of the landscape. The management provided by the lessee relieves the state of a significant stewardship expense. One must be very careful to consider the fragmentation that will occur of the habitat if changes of use occur to generate more income that are not compatible with the current uses on the existing units. Do not let the resource assessment get too removed from the land or the personnel that understands all the relationships involved.</p> <p>Development of Performance Standards. This is reasonable, but one must remember the more standards incorporated into the lease will decrease the marketability of the lease. These standards could aid in the prevention of frivolous and unqualified bidders in the auction process.</p> <p>Resource Assessments. I am not familiar with the Land Board's Vegetative Management Policy. It is important that the staff get out on the land to assess the AUMs the land produces due to past use and vegetative manipulation. The Fish and Game's influence on management of state lands to address their perceived needs directly influences the ability of the state and lessee to use vegetative manipulation to increase production. The sportsman should be fiscally contributing to the trust for their use of state lands. These lands are not public lands.</p> <p>Auctions. No mention is made on how the current lessee's improvements will be valued in the auction process. It is extremely important that these improvements be given a value equal to a replacement cost. To do otherwise gives the challenger the ability to purchase infrastructure that is undervalued. This puts a lessee that has done a lot of improvements at a disadvantage.</p>	Support (with recommendations)

	<p>I support the auction process as long as the improvements and management contributions I make to the state lands I lease are recognized and that the other participants in the auction are similarly qualified and willing to pay for these improvements. It is important that an auction party has the ability to continue the land management plan designed for the unit that the contested lease is a part of. I have participated in the public comment process that resulted in your summary of public comments. I am concerned that the sportsman is not being asked to pay a minimal fee for their use as is done in Montana. I thought that the additional revenue stream comments were good. It is important to recognize management costs the lessee contributes to stewardship of state land.</p>	
34	<p>I like things the way they have been for the last 36 years. If the ground checks out good, I would like a longer lease.</p>	Support
37	<p>I would like to see additional applicant screening or grazing management monitoring to eliminate lessees who acquire grazing leases and then do not use them. They just tie up the permit to spite those who would and could use them. They should use it or loose it after two years of non-use. I would like to see the state give preference in grazing permit to previous lessees, if that person had taken good care of the leased state lands.</p>	Support
38	<p>IDL parcel is very important to our operation since it is next to deeded ground on 3 sides. Our Forest allotment is on the 4th side. On the Proposed Expiring Lease Process, if this would ever happen, we would be very interested in obtaining this parcel of ground either by bid or auction.</p>	Support
39	<p>Part of the proposed process that I am opposed to is the bidding. Just because somebody has a lot of money does not mean he can take good care of the land better than a lower bidder. Longevity of the lease should be considered to eliminate conflict of lessee who have taken good care and not overgrazed the land, and pay prompt. I approve of giving preference to the current lessee in lease renewal process.</p>	Support (with recommendations)
40	<p>This section is heavily timbered and needs thinning. We pastured thinly for the last 2 years and did some improvements and feel we need consideration.</p>	Support

41	<p>The renewal process of the state lands needs to be kept the same as always. The new plan should be as grazing friendly as usual. All state lease holders should be invited to the meetings not just those with grazing leases. State lands need to be evaluated on a piece by piece and on case by case basis to determine best use. In the process of transferring lands, ranchers must be compensated for their improvements.</p>	Support
42	<p>I feel preference should be given to current lessee and should have first right of refusal for either renewing the lease or buying the land at appraised value. Only if they do not want it back should it be open to the public.</p>	Support
43	<p>I like the new approach of considering every lease on its own merit. Maybe upping AUMs for more dollars and what would be most financially feasible. But please keep in mind what it might do to the rancher if you decided not to graze it. I like the changes in Resource Assessment and I think the development of performance standards is a good idea. On the auction, I like the thought of checking out an applicant's past performance so that only those with good report and record can bid. I like open bidding where everyone can know the offer and have chance to up the bid. A longer lease period rather than 10 years would be better for some of us who plan on ranching for all our lifetime and pass on to the next generation. We really appreciate how easy you are to work with.</p>	Support
47	<p>The two sections we lease are very close to the river and trail. They are mostly rocky... and not good for grazing. I surely would hope that you would let adjoining landowners have first notification and first option to buy these small useless pieces of state lands joining our land for their protection.</p>	Support
52	<p>I support your efforts to revise the process for expiring leases and believe the proposal contains a number of beneficial elements. I support your efforts to streamline the administrative process for those lease renewals on which there are either no resource/management issues or for which there is a single applicant. I also support your proposal to shift the efforts of IDL staff away from those state lands, which are essentially incorporated within BLM/FS lands and managed with the federal permit. I recognize and appreciate your efforts to make the management of these lands more efficient in order to maximize the return to the endowment beneficiary. I also encourage you to look at changing the statute to be able to offer lease with a term of more than 10 years.</p> <p>While I agree that the proposed change in demands on staff time will allow more site specific work on those</p>	Support

	<p>leases most in need of staff attention, I question the use of the term "standards". If your use of the term "standard" is actually more related to "indicators", or "goals", or "management practices" that are designed to obtain a result on the land that is consistent with each sites' specific potential, then I support that approach. If your use of "standards" is intended as I have indicated above, then I have the following additional comments. It is difficult to make comment regarding the process without knowing exactly what the "performance standards" would consist of Blanket standards applied to any location where a given issue or concern is raised (Issues & Concerns Checklist) would likely prevent some entities from even bidding on a lease, or in the alternative may give someone an advantage in the bidding process. As of yet I don't know what will be in the checklist. Presumably it will be lengthy and will at some point address resource issues and concerns in addition to other managerial factors. If the performance standards are equivalent to BLM stubble height, bank impact, utilization and willow browse standards and are applied universally they could have very high negative impact on bidding and lease value. BLM is currently working on an Instructional Memorandum (IM) that would identify these as grazing management indicators, which would be used to help devise grazing management strategies for grazing allotments. The development of the IM is not yet final so I don't know yet just how they will be used but the current BLM direction seems to be a reasonable approach. A clear understanding of the Issues & Concerns Checklist and subsequent identification of performance standards is needed in order to make any assessment of how the proposal may affect net income from grazing leases. The second step in the multiple application process is key. If performance standards are hard and fast rules for use of a particular range it may be difficult to arrive at a management plan to meet those standards and remain compatible with the associated ranch operation. Presumably the Issues & Concerns Checklist would identify those state lands that are intermingled with other ownerships to such an extent that an independent management plan for the state land would not be practical or advisable regardless of any resource issues in the Checklist. Water sources (springs and streams) on intermingled state land are not considered in the BLM permit renewal process. Likewise, when such water sources are on federal land, the permit renewal process does not consider the management implications on state land e.g. continuous or nearly continuous spring grazing may be applied to state land uplands that could be detrimental to the state interests.</p>	
53	<p>The available information appears to equate performance standards with management objectives since they would be identified and applied on a site by site basis. Thus they would not be standards but interim objectives intended to achieve endpoint goals based on management/resource issues. We believe performance standards should be viewed as grazing management indicators to be used in the development of long term grazing management, which addresses the applicable resource issues. This is the approach taken in the Owyhee County Natural Resources Plan whereby grazing treatments with specific interim objectives and endpoint goals are identified and suggested for the</p>	<p>Support (with recommendations)</p>

	<p>development of proper grazing management plans and strategies. These proper grazing management plans are to be applied across intermingled land ownerships. We believe the state should take a similar approach. Broad scale standards applied to locations where certain issues or concerns are raised (Issues & Concerns Checklist) could significantly alter the bidding pool for a given lease depending upon the subsequent site evaluation and proposed performance standards. Again the available information does not fully disclose the content or intent of the "Issues and Concerns Checklist". Presumably this element of the process would be lengthy and would address management constraints and concerns as well as resource issues. If the intent is to merely assure that all issues and concerns are fully and appropriately considered we have no objection to this step of the process.</p>	
56	<p>The Department should identify factors within and adjacent to the lease parcel that affect the ability to lease that land. This internal assessment should evaluate:</p> <ol style="list-style-type: none"> a. Number and acreage of noncontiguous parcels within the lease; b. Factors that affect marketability of lease. This includes needed fencing, access, water, ownership of parcels within grazing unit that affect the leaseholder, and the Department's ability to manage the endowment property; c. Ability to control management of the parcel; and d. Procedures for Department review of options other than re-leasing the property <p><u>Resource Assessments</u></p> <ul style="list-style-type: none"> • The "issues & concerns checklist" should address lease management limitation issues in addition to resource concerns. • While we more thoroughly need to review the Land Board Vegetation Management policy, we believe it should be amended, if necessary, to list certain criteria for local administrative staff to refer to in order to determine when and if resource assessments or inspection reports are necessary and what should be assessed. <p><u>Development of Performance Standards</u></p> <p>This section needs clarification and definition. We are unclear what the term "standards" is supposed to represent. Does "standard" refer to the term used by federal agencies, or was the choice of the word and the</p>	<p>Support (with recommendations)</p>

industry interpretation of the term unintended? In other words, do “standards” refer to ability-to-graze issues or on-the-ground resource measurements? The above “issues & concerns checklist” should adequately address any issues that are concerns of IDL staff. The establishment of standards to address the issues will result in the expenditure of significant staff time that could be avoided. Staff will be required to identify the issues and review the management plans that should address those issues. Asking staff to establish standards prior to the receipt of management plans is redundant and could inhibit creativity of management plans.

This section should be eliminated. We can find no benefit to the Endowment or to the Department of Lands in the creation of performance standards. How would performance standards increase the return to the Endowment? Realistically, they would increase staff time prior to auction and increase litigation opportunities when standards are perceived by outside groups to not be met or are unattainable.

Auctions

We intend to review with IDL why grazing leases are subject to auction process. In our review of other assets classes, in particular commercial leasing, there appears to be an inconsistent interpretation of the auction requirement.

Other Recommended Changes

As you can see on the attached flow chart, we have made other recommendations that we think will improve the grazing lease process. Those recommendations are highlighted in yellow in the charts. Those not already addressed above include:

- **Review of improvements** – In the year prior to lease expiration, IDL should coordinate with the current lessee to identify existing improvements. This review will be available when the lands are posted for grazing lease application. This will only be a list of improvements, not the valuation. Improvement valuation will occur later in the process, as identified in the new improvement rules developed by the Work Group and approved by the legislature.
- **Management plans** – Management plans should be included in the application packet for a grazing lease. The plan should address the issues & concerns raised in the checklist (both resource issues & lease management issues).

	<ul style="list-style-type: none"> • Application fee – A non-refundable processing fee should be assessed when applications are turned in to IDL. This will generate revenue to offset that additional costs incurred by IDL staff in contested leases. • Ability to perform –Information should be provided in the management plan that IDL can use to evaluate the applicant’s ability to perform on the lease. IDL should have internal criteria which will allow them to assess the applicant’s ability to manage the lease. 	
57	We support what the Livestock Work Group has written and go in record as is.	Support
58	Anything that can be done to minimize conflicts for the Land Board is good. The statements on performance standards need to be more clearly defined so the applicants can know more exactly what is expected.	Support
7	I am placed in a position of having to bid in order to maintain my grazing on state land. Somehow I do not think that all is OK with this situation. Yet I may lose my state lease if I do not out bid the neighbor who is going to try to steal it from me. I am disappointed in the system.	No response
8	There is a need for fair Competitive bidding. Whatever comes out of the deliberations the program should be administered in accordance with the rule of law, and not on the basis of favoritism?	No response
17	The one thing I see can hurt us in this new proposal is the fact that the better care you take of the land, the more chance someone else will take notice to outbid you. Our particular leases is intermingled with other parts of our land and our Forest and BLM permits to the point it would not be feasible for someone else but I am sure there are cases where a different situation exists and moneyed ranches are becoming more prevalent. The old hard working self-supporting ranchers are the ones who will do you the best job, but I can see how that would change under this proposal. There should be some protection for the good tenants who have proved to care.	No response
19	Your process before me has some good ideas. Most of them require a constitutional change. Offering grazing leases to qualified livestock owners- doubt that would hold up in court. Selling small isolated parcels is a good idea.	No response

21	<p>My brother and I have lease on some state lease land in Kilgore. When we bought the land in Kilgore about 14 years ago, we wanted to put a pipeline in to water our cows and the line had to cross state lands. We had to do an environmental impact study first. People from different government agencies walked over the land. They found three sets of Sage Hen droppings on the whole ranch. This included private land, state and BLM. We did some brush control which consisted of spraying on private land and brush cutting on state land. With the pipeline and brush removed, we have a lot of Sage Hens there. It has been my observation that Sage Hens will not stay in heavy brush. My brother tried three years ago to get permission to spray the sage brush on state land. He was told that the State Fish and Game had to come and take a look. This was before fuel got so high. Now we cannot afford to do it. The sage brush needs to be sprayed every five years so it will give us a lot more grass. If you remove the brush, you can put on more cattle and collect more money. The state land we have is too rocky to cut with a tractor. An airplane is a better way to go.</p>	No response
29	<p>The more planning and financial pressure imposed by the Board the less personal interest I take in my leased land. The land becomes something I use rather than something that is my responsibility. As financial and management pressure increases the need for Land Board oversight (costs) will increase. Pride of ownership is a tangible but immeasurable asset. If leaseholders do not have any incentive to take pride in the land, abuse will follow. I know ranchers at both ends of the pride of ownership spectrum. Unfortunately, you have to manage for the least responsible lessee. Doing so will alienate responsible managers. The Land Board has a responsibility to manage for the Long Term. As soon as the term: "Fiduciary" is added there is an inherent conflict. In the financial world long term plans are those beyond six months. In our rapidly changing world any financial plans beyond two years are just wishful thinking unless flexibility is built into the plan. This flexibility can result in a complete reversal of direction if rate of return is emphasized. Contrary to the modern financial world, grazing and ranching have low elasticity. They cannot change direction easily. The land is even more resistant to change. The concept of Long Term needs to be defined by the board. In doing so, these apparent conflicts will diminish. The importance of grazing and resource extraction to the state's economy has been decreasing and will probably continue to decrease in the future. The ability to use endowment lands for conservation or other purposes will become more important in the future.</p>	No response

<p>30</p>	<p>The “identification of performance standards and requests for management plans must not unduly restrict competition for leases. IDL must keep firmly in mind the Constitutional and statutory requirements as it formulates these procedures. These Constitutional and statutory mandates are variously referred to in IDL’s “Summary of Public Comments from the May 2008 grazing Subcommittee Request” as including the following:</p> <ul style="list-style-type: none"> • “these [endowment] lands must be managed for the maximum long-term return to the endowment beneficiaries” (page 1 of 8); • IDL “has a duty to invest and manage the land trusts ‘as prudent investor would’”(id.); • The subcommittee “seeks to find a way to improve the current leasing process to provide more transparency and thereby enhancing competitive bidding on grazing leases” (id); • “carefully preserve the land...gain the greatest long-term financial return to the endowment beneficiaries” (page 2 of 8); • “Under the Idaho Constitution ,endowment lands must be managed to the maximum long-term return to the endowment beneficiaries (page 3 of 8); and • “ensuring market conditions that will enhance the rate of return....(page 4 of 8) <p>Any performance standards or management plan requirement that reflect deviation or departure from the above requirements, that restrict competition for leases in such a way as to frustrate achievement of the above goals, will be vulnerable to legal attack for failure to meet Constitutional and statutory strictures.</p> <p>It is well established in the law that “pre-qualification” or “qualification” prerequisites for public bidding will be subject to challenge if such restrictions on competition are not closely related to, and demonstrated in furtherance of, a valid Constitutional or statutory objective. These well-established legal principles apply fully to public, competitive auctions of leaseholds, including the “grazing” leaseholds at issue here.</p> <p>Nowhere in the Constitution or governing statutes is there any reference to giving special treatment to grazing. Any restrictions that favor grazing over other uses must be based on clear evidence that grazing, to the exclusion of other uses, clearly will further the valid Constitutional and statutory objectives summarized above. To date, we have seen little evidence either overall, or on a parcel-by parcel basis, that grazing ever furthers any valid Constitutional or statutory purpose when compared with other permitted uses.</p>	<p>No response</p>
<p>33</p>	<p>I am encouraged to hear that the Department may or may not recommend that leases only go to the higher bidder. The current auction process might not benefit the Endowment with the costs to handle conflicted</p>	<p>No response</p>

	<p>grazing leases costing four times more than the monies received. The Land Board must have the discretion to award grazing leases to ranchers who have a proven history of cooperation. I feel the most economical way to ensure revenue from the grazing program is to reduce turnover in lease holders and thus ensure the stability and reliability of ranches and open spaces. If truly 30% of staff time is spent on lease renewals, please consider authorizing a lease of 15 to 20 years instead of 10 years, in those cases where there is a proven cooperation and a history of care of the land. It would be beneficial to trade or exchange some of these isolated lands to the ranchers who have leased them for years, and let them be included in private land held by ranchers, to keep open spaces open and yet protected by beneficial use of the land.</p>	
36	<p>I have already sent in written comment and I am not able to attend your hearing. I want to reiterate that the value of state endowment lands is of benefit to states education funding. The short term goal is to raise as much funding as possible but in the long term maintaining viable tax base is most important. Therefore, continuing to lease to ranchers with long term commitment to the local county and state economy is of more benefit than leasing to our nemesis ---whose stated goal is the destruction of the livestock industry and communities dependent upon them. P.S. don't price us off the land!!</p>	No response
51	<p>I like the idea of prequalifying bidders on conflict bids. The only bidders who should involved in the bidding process should be those with a legitimate reason, not to create loses or slow up the whole process. The four inch stubble height has never been a good idea. Conflict bidding by qualified bidders is a good way to insure fair market value of state lands.</p>	No response
59	<p>The renewal process for state lands needs to be kept as simple as possible. Any wording referring to performance standards should be changed to read performance indicators. The new plan should be as grazing friendly as possible. All state lease holders should be invited to meetings. State lands need to be evaluated on a piece by piece/case by case basis to determine best use. In the process of transferring land ranchers must be compensated for improvements.</p>	No response
9	<p>I understand that some ranchers do not take care of the grazing lease properly. These ranchers should lose their lease immediately and others should be able to bid on the said lease. The problem I see is with small isolated tracts of state land (640 acres or less) checker-boarded throughout the state. These grazing leases should stay at status quo or offered to us at an affordable price, or traded to develop one state pasture.</p>	Does Not Support

10	Stability of the lease is of great importance to the lessee as financial decisions are made around the availability of the lands. I think prudent heads should adjust the system to increase revenue by charging a good rate but not throwing out the tried and true lease process.	Does Not Support
12	These state grazing lands need to be kept, used and taken care of.	Does Not Support
13	The new lease application process places current lessees at risk of having their leases taken away by a higher bidder. Just because someone has a lot of money to bid on an allotment does not mean they will take care of it. Current lessees use grazing of these allotments for their primary income. It is in their best interest to take care of the allotment that they can. This sustains their family income for years to come. Will an open auction produce the same quality of stewardship?	Does Not Support
14	Give preference to the current lessees in lease renewal process	Does Not Support
23	I am against the lease application proposal for the following reasons: The new lease proposal fails to acknowledge any type of recognition or preference given to the current lessee. I believe the phrase used to “enter the process on a level playing field” State endowment grazing lands should remain just that ... land leased to raise livestock. Management plans to graze must be developed and subsequently carried out by the lessee.	Does Not Support
27	The Idaho constitution and Idaho code needs to be changed so that conflicting leases need not go through an auction process. The current lease holder should be able to match any written offers and have the ability to hold onto the lease. This is very crucial in many ranching operations. It is handled this way in other states.	Does Not Support

31	<p>I support the bidding process only for large tracts of grazing land involving big ranchers. I am writing concerning our lease as it is small, isolated and timbered. It is home to abundant wildlife including white tail deer, moose, turkey, bear, occasional elk, and smaller animals. Wildlife depends on the water supply. It is a watershed to the St. Joe acres. Lake Hepton, a state spring, ponds and possible well below it. We think the property should be protected, remain for hunters, wood gatherers and welfare of the animals. It should not be sold or traded. Once it is gone it is gone forever and would be Idaho's loss. Regardless of the fiduciary factor, it is a piece of land that is far more valuable to Idaho than dollars.</p>	Does Not Support
32	<p>I believe existing lessees should have preference over conflicting bidders in the issue of a state lease. State lease ground is used in conjunction with private land and/or government AUMs in a production unit and is an integral part of a long term farm plan. Predictability in long term plans where land ownership is comingled is a necessity for existing owner survival. Lease rates should be competitive and BMPs utilized to achieve production potential and maintain the integrity of the leased land. If Idaho statutes need to be changed, let's do it.</p>	Does Not Support
35	<p>It is my concern that the auction process will leave ranchers vulnerable to losing their state lands to environmental groups who will be able to outbid ranchers. These groups have more money donated to them and will not hesitate to use it to get ranchers off grazing lands. The state land leases that we have are vital to the operation we need to succeed. If we must have change, an increase in the rate per AUMs allowed could be in order.</p>	Does Not Support
44	<p>I believe grazing and timber harvesting are both good uses for the land we rent. Longer term leases would be a good idea as we incur a lot of cost in spraying weeds. My lease is intermingled with private land so it would be hard to separate them out.</p>	Does Not Support
45	<p>I don't think that any person with a longtime lease and a good steward of the land should have to bid to get the lease</p>	Does Not Support
46	<p>We don't like the auction part of the leasing process. Access to the state land will be an issue if somebody else were to get our lease. Also whose responsibility would it be to fence the section to keep cows in or out of state land? Until these questions are answered we cannot vote in favor of the proposal.</p>	Does Not Support

48	<p>...Your plan of the land going to the highest bidder is opening this up to Western Watershed and other environmental groups to take over state lands. There is no way farming can compete with these groups. Our parcel is dry land pasture surrounded by private ground and if it is ever put up for sale we want to be notified.</p>	Does Not Support
49	<p>Our situation came about through a land exchange with BLM...caused an increase in AUM fees and set up the possibility of an auction which we didn't have when it was a BLM permit. I would like the Land Board to give more consideration for past performance and if a rancher is doing a good job an auction should not necessary as this would put a small rancher out of business. First right of purchase should be considered with additional cost to the lessee.</p>	Does Not Support
50	<p>You must give more consideration to good renters of state land. I believe you would do your performance standard rating when a lease came up. If the renter has paid on time; has done improvements to increase AUMs for the endowment; has used proper management skills and improved the resource, he should be given bonus points which can translate into a longer lease or a first right of refusal like the state of Montana does for their lessees. This is the way you are going to entice people to make improvements and increase your revenue.</p>	Does Not Support
54	<p>The current lessee should be given preference at time of renewal and prior management should be considered. If the lessee is doing a good job and managing livestock responsibly, management of the grazing should remain with the lessee. Consideration of adjoining land ownership, access and water should play in renewal of lease. Good managers should be able to increase the 10 year term, and eliminate conflicting applications. Encourage improvements and wildlife habitat, water or spring development by reimbursing cost or incentives. Small or isolated parcels could be sold to lessee or adjoining landowner.</p>	Does not Support
55	<p>Proposed expired lease process fails to respond to the direct intention of the Board adopted Asset Management Plan. The proposed expired grazing lease process with a "file review" and an "issues and concerns" checklist does not clearly identify the criteria Department staff will consider. The Department needs to make this proposed checklist and file review process available for public review before it is adopted. At a minimum, the Department should include in such a review and checklist the appraised capital value of the lands within an expired grazing lease and the annual return on capital value in comparison with the rate-of-return range adopted by the Asset Management Plan for grazing leases. If the rate-of-return cannot meet the financial returns required by the Asset Management Plan, the Department should not renew the lease unless a lease rate is implemented to assure that return. Our organization opposes the elimination of the Resource</p>	Does not support

Assessments for expiring grazing leases. It appears that the expiring grazing lease proposal to eliminate this aspect of management is designed to reduce administrative costs thereby increasing returns to the endowments. Unfortunately issuing grazing leases even with no administrative costs would still not meet the return on asset that the Asset Management Plan requires. The development of “Performance Standards” for each expired grazing lease assumes that the Department will accept new applications for grazing on a particular lease. The proposed process states: “Applications from applicants who cannot meet the performance standards using management practices acceptable to the Department will be rejected”. This is simply a recipe for blocking open and reasonable competition for these leases and in all likelihood would be used to reinforce the usual and historic bias of the Department of Lands to enable ranching at the expense of the beneficiaries of the endowments. The policy for leasing these lands should open the process to non-traditional conservation competition to improve financial and conservation returns to the beneficiaries especially if such uses meet the rate-of-return criteria of the Asset Management Plan. The mention in this section of the proposed assessment of management proposals from applicants for grazing leases to determine if they will “not require additional costs to the Department” provides an opportunity for the Department to fall back into its current role as the protector of existing rancher lease holders by denying reasonable applications from conservation groups and conservation-minded individuals to compete for expiring grazing leases to in order to retire them from livestock use for the period of the leasehold. It is not clear that the Subcommittee and the Department will recommend an open process for grazing lease renewal that will encourage and accommodate competition from applicants interested in conservation of these landscapes without livestock. Does the Subcommittee believe that reducing the opportunity for competition meets the Land Board’s fiduciary responsibility? Subcommittee needs to make clear in its recommendation to the full Land Board that open competition for leases that results in a leasehold that meets the Asset Management Plan rate-of-return and that does not degrade the lands under lease are desirable and welcome. The creation of “Performance Standards” and the “pre-qualification” of applicants for auctions of grazing leases will enable existing Department of Lands bias against non-grazer applicants to continue to block good-will efforts to increase returns to the endowments while reducing costs for the Department and preserving the land asset. Why is the subcommittee even considering this return to backroom “qualification” of applicants? Subcommittee is about to provide some new way to “increase grazing lease stability and provide incentives for lease improvements”. This phrase is typically used as a euphemism for making rancher tenure on grazing leases more secure by reducing competition, extending lease periods or providing other give-a-ways to ranchers so that they needn’t be bothered with competition or increased costs that actually will fulfill the Land Board’s fiduciary responsibilities.

