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Comments: comments

My name is LD Green, I live in Othello Washington and lease the Lake Ellen grazing allotment from the Colville National Forest.

The ARCS-mod guideline for herbaceous stubble in riparian zones of 6 to 8 inches is too severe. Especially since (to quote Clary and Leininger 2000) 4 inches or even 2.75 inches may provide for adequate riparian ecosystem function. This highlights why local management on a site-specific basis is imperative.

Many plant species do not mature at 6 to 8 inches.

Grazing permitees have strict guidelines on AUMs, shortening grazing seasons in order to accomplish stubble height requirements will force us out of compliance.

Decreased road densities will make gathering cattle at the end of the season, and mandatory pasture moves and routine fence and water maintenance more difficult . It will also make controlling wildfires much harder.

One scenario would be to allow grazing permitees to keep some roads clear.

Management of resources must be site-specific as the Colville National Forest includes a large variety of conditions and settings.

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