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First name: Anon

Last name: timmbrothers@ncidata.com

Organization:

Title:

Comments: Colville National Forest Revision Plan

To Colville Forest Revision Team:

I am submitting a short response to a small portion of the Colville National Forest Revision Plan. I represent a farming family in the lower Okanogan area. We have a grazing permit on the Colville Forest and also manage another families grazing permit. Although we came to the discussion table very late in the planning process, we feel documents like this require countless hours of very hard work and we thank the people associated with its formation for their time and effort.

Our family has been farming, raising cattle and sheep for several generations. We are constantly striving to improve our operation and are trying to stay on the cutting edge of technology to help guide us into the future. No matter how many hours you put in on a project (or job or idea ), upon review, there is still room for improvement. This is always the case, but you always strive to improve on the next cycle, making changes as you go, this is how I view the Forest Plan Revision.

The comment I would like to make concerns grazing and the seemingly arbitrary minimum stubble height of 6-8 inches:

We have had various monitoring programs for over 30 years, mostly through the Colville Tribe and our local NRCS office. We have never encountered an arbitrary value such as 6-8 inches of stubble height without taking into consideration the following:

- the species being grazed
- elevation
- rainfall and temperature especially degree days
- the time of year grazing is taking place (which season is it)
- rotation cycle

We are concerned about the science behind this statement on stubble height, maybe it exists. If so, It should be published along with a peer review.

Thank you for the opportunity to be heard and once again thank you for your efforts.

In closing, I would like to express a few personal observations:

- 1) Grass is the world's largest crop and harvesting it by livestock is the most efficient method for converting coarse fiber into nutritious protein.
- 2) Controlled grazing offers benefits for both fire control and weed management.
- 3) Selected species enhancement through controlled grazing.

Sincerely

Frederick Timm