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Comments: This will be a quick comment since I haven't had time to completely delve into your proposed language. In theory, the concepts covered in Succession Planning / Recognized Entities (permits to successors generations begin at 50% of the previous permit holders authorized days) sounds good but should include an approach that permanently retires unused service day. Too often, those unused and still available days are based on outmoded historic allotments and not on current best management grazing practices. Get rid of them! And please prioritize that retirement of day when allotments are in Wilderness Areas - that compromise should never have been made and it is time to re-evaluate the effects of commercial grazing on wilderness character.