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To National Organic Standards Board
C/O Arthur Neal South Building Rm 4008
1400 Independence Avenue, SW
Washington, D.C. 20250-0001

From

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I would like to comment on the proposed pasture requirement changes.

I own and operate a small family dairy farm consisting of approximatly 30 dairy cows.

I applaud your recommened rule changes in § 205.239, the requirement of 30% drymatter pasture intake on a daily basis during growing season but not less than 120 days

I do have one concern. During growing season if there would be a drought and I could not mantain the 30% drymatter intake from pasture, would I then be decertified?

I think there should be an exemption from the 30% drymatter intake from pasture requirment if there is a drought.

thank you Susan L. Martin

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