SUBJECT: Morgan Nesbit Forest Resiliency Project

FROM: James D McClure

Date: April 3, 2013

I am submitting this comment to express my concerns about the subject project, as described per letter #1950, March 1, 2023 and the scoping materials linked therein. My interest in this project stems from extensive work in the WWNF and adjacent areas, from the mid-1990s to about 2010. Due to work on embedded private lands and riparian surveys, I am especially familiar with the Imnaha River watershed, including tributaries from Little Sheep Creek southward past Gumboot Creek and eastward from the Eagle Cap Wilderness through the HCNRA to the adjoining Wilderness.

The goals of improving the forest's increased resilience and tolerance to drought, fire, and firefighter safety, as well as promoting old-growth structure, riparian ecofuction, and aspen stands are noteworthy and to be commended. In cases where past fire suppression and inappropriate management has resulted in thick, fireprone 'dog-hair' stands clearly need attention. In this context, however, emphasis should be placed on areas near existing private infrastructure, avoiding destructive and disruptive effects on the more remote areas where natural fire has an important ecological role. Of particular concern is the emphasis on 'timber' and 'wood products,' euphemisms for logging operations that have decimated US forest values throughout the West. In addition to concerns about removal of larger-diameter trees, coveted by the logging industry, is the associated need for new roads that produce sediment destructive to riparian function.

As I'm sure you are aware, the subject area lying between two protected wilderness areas has exceptional wildlife values, which extend even further as essential regional migration corridors. This highly diverse landscape and forest cover in the remote setting of the Imnaha watershed has exceptional value for all Americans, not just the relatively few who live nearby.

I do hope and expect that your decision will reflect your national mandate to protect and preserve this exceptional resource for all Americans, now and future generations.

Thanks for the opportunity to comment.

Respectfully yours,

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