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Comments: I see that the proposed action includes approximately 3,693 acres of treatment within three treatment types - mechanical fuels treatments, hand fuels treatments and commercial tractor logging.

We should invest in "fuels reduction activities" (e.g. thinning) only where it is most effective (directly adjacent to communities, especially within 60-100 feet of structures), NOT in remote backcountry areas far away from communities. Speaking of structures, we should invest in measures that make them fire-resistant, and also discourage further expansion of any structure in obvious fire-prone locations.

Numerous studies of recent fires have demonstrated that "treatments" such as thinning and "commercial tractor logging" are ineffective at reducing wildfire intensity or extent. When drought, high temperatures, high winds, and lightning produce a stand replacing wildfire, no "treatment" will be of any use.

I studied forestry in graduate school at Colorado State University, and served as a national park ranger in a number of western parks. I was at Yellowstone during the fires of 1988, and have continued to learn about the ecology of forest fires.. Notably, the only fire break that stopped the spread of fires in 1988 was Yellowstone Lake. Fire brands carried the fires across the Grand Canyon of the Yellowstone. We are fooling ourselves that we can save forest communities by logging beyond 100 feet of buildings.

I see that one purpose of the project is to "improve the health and condition of the forest ecosystem, including White bark pine. " IN 1903, President Theodore Roosevelt said of the Grand Canyon, "Leave it as is. You can not improve on it. The ages have been at work on it, and man can only mar it." That statement applies to the ancient mature forests of the mountains around Cooke City and Silver Gate. Those forests are not sick; they are the product of millennia of evolution that have resulted in an ecosystem that does not need our help.

Forests are among the largest stores of living carbon on the planet. No wonder that the US Forest Service is drafting an EIS for the National Old-Growth Amendment in response to the December 20, 2023 U.S. Department of Agriculture announcement of a Notice of Intent to amend all 128 national forest land management plans to conserve and steward old-growth forest conditions and recruit future old-growth conditions in light of increasing threats due to rapidly changing climate conditions.

This project does not seem to me to comply with the intent or spirit of the Old-Growth Amendment, and should simply be tabled until the EIS has been completed.