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First name: Matt

Last name: Wardell

Organization: Bold Visions Conservation

Title: Policy Analyst

Comments: To The Director of Ecosystem Management Linda Walker, and all others concerned,

Bold Visions Conservation applauds the current administration's efforts to preserve and restore our national ecology. However, we take issue with a number of provisions in the National Old-Growth Forest Amendment (NOGA) as currently proposed. First and foremost, "Standard 1," which requires that no action taken by the agency could "degrade or impair" Old-Growth Forests (OGF) must be reinstated.

As currently worded, this amendment would allow for the degradation and destruction of OGF in the name of "proactive stewardship." The definition of "proactive stewardship" could be interpreted so broadly as to allow OGF to be reclassified to permit logging and recreational activities that could significantly damage the forests NOGA was originally intended to protect. That verbiage could be used to subject the OGF this amendment was ostensibly authored to protect to all manner of abuse.

For the conservation community to support this amendment, it must include provisions that clearly protect existing OGF by requiring they never be reclassified for any reason. No commercial logging, or expansion of existing trails/roadways to allow motorized tourism can be permitted. Creating tourism and commercial opportunities is not the purpose of this office; logging and road-cutting are the only factors in OGF management that can be truly regulated. Fire, disease and pests cannot ultimately be controlled by humanity, but these few things we can actually control, we should.

We must also clearly define what an "Old Growth Forest" is under the law. The current definition is quite broad, easily disputed, and based on science which is both limited and outdated. The entirety of the amendment is proposed based on the study of far too small a sampling of forest, specifically the Madison-Gallatin Range, and according to information from the department, largely on the study of a single species of tree, the lodgepole pine, which is often grown exclusively for logging. We believe new studies should be commissioned to establish a firmer, more inclusive definition of OGF before any amendment is made, and that their purpose should be to find and add OGF acreage to the nation, not to decide how much of it can be exploited for profit without killing it all at once.

As currently written, a cynic might interpret the language to be so intentionally vague as to allow for OGF destruction in the name of profit. We at Bold Visions Conservation are not cynics. However, in our decades of experience, we've learned that this kind of ambiguity in the law is often exploited by those more unscrupulous members of our society, who do not care if we destroy the earth and leave nothing for our children or theirs; so long as they can make a few dollars.

Please consider the future of our national ecosystem. Consider that these forests are among the most precious national resources we have in the fight against climate change. They are also home to a great many species of both tree and animal which the conservation community has fought for decades to preserve. The NOGA, as currently proposed, would undo many of the legal protections which have allowed us to win the small handful of fights we have. If this is the only amendment that can be made, then it would be better to make no amendment at all.