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Comments: Durability: Nothing appears to stop the agency from pursuing management activities that take the forests out of old growth status, at which point any protections offered by the NOGA would no longer apply. All alternatives explicitly allow line officers the discretion to manage old growth out of existence in pursuit of "proactive stewardship" goals. The alternatives also contain ambiguous language that could be used to justify continued commercial logging of old growth in the Tongass National Forest. And line officers appear to have the discretion to modify NOGA protections in individual forest plans through the forest plan amendment or revision process.

Mature: It is extremely disappointing that the agency has ignored public calls to adopt standards for protecting mature trees and forests. The adaptive strategy directs National Forests to look for forests for OG recruitment, but it's all left to local discretion. Part of the "purpose and need" of this policy is ecological integrity. Without specific mature forest protections, the agency will fail to recover the abundance and distribution of old-growth forests and will undermine its ecological integrity objectives.

Definitions: They're using individual forest plan definitions or regional ones (where plans don't have a definition). First, these definitions are generally narrowly written as to exclude much forest and trees that are, in fact, old growth. Second, line officers have a lot of wiggle room on how to apply the NOGA. Part of the "purpose and need" of this policy is a consistent approach to old-growth conservation. The extreme discretion and flexibility given to local managers undermines these objectives.

De minimis: While the Tongass is no longer singled out for exemption, the "de minimis" logging of old growth language in the DEIS expands what was worrisome about the Tongass exemption to the entire National Forest System. It opens the door to a lot of old-growth trees going to the mill. There is no clarity or limiting language on what constitutes "de minimis." Logging "de minimis" old growth can be for "local community purposes" or for "research." (Standard 2c v)

Old growth can still go to the mill: As written, Standard 3 in Alt 2 would still allow for a lot of old-growth trees to go to the mill. For instance, where line officers determine that the rules about proactive stewardship aren't "relevant or beneficial" to a species or forest type under 2.c.vi, old growth trees can be logged and sent to the mill.

Carbon and climate mitigation is largely missing from the draft proposals.