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Comments: I am writing to urge strong protections for old-growth forests and actions to ensure that at least a portion of mature forests are allowed to evolve to old-growth conditions. Old-growth forests are uniquely amazing and serve the planet and humankind alike. We have already destroyed so much, that it seems crucial to cherish what little remains, and to add to the forests that represent old-growth conditions.

From MountainTrue in Asheville, NC, I understand that the NOGA draft could be substantially strengthened to achieve those goals. Specifically:

- 1. NOGA should be amended to include passive management as an option for managing old-growth forests.
- 2. The Forest Service should remove the exception that allows for development at an "ecologically appropriate scale" and employ clear, already defined language to improve NOGA's clarity.
- 3. NOGA should be amended to include a clear plan for recruitment of mature forests into old-growth conditions.

Thank you!