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Comments: NOGA prescribes a one-size-fits-all approach to forest management. As written, NOGA characterizes threats to old-growth forests uniformly across the country. While fire poses a risk to western forests, eastern old-growth forests are more vulnerable to improper management and commercial logging. The same management actions that benefit fire-prone western forests will not be suitable for moist eastern forests. NOGA should better characterize threats and more specifically prescribe management actions based on forest type and location.