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Comments: In its current form, NOGA lacks clarity and includes loopholes that could inadvertently worsen current management practices for old-growth forests. Far from meeting its intent of protecting and restoring old-growth forests, NOGA's current language could allow for inappropriate old-growth harvest.

Old-growth forests store large amounts of carbon, clean the air we breathe, provide critical wildlife habitat, maintain and increase biodiversity, filter water, and reduce wildfire risks. The old-growth forests of the Nantahala-Pisgah National Forests are home to several endangered and threatened species, including four species of endangered bats and the imperiled Blue Ridge lineage of green salamanders. Unfortunately, across the nation, old-growth forests are in decline, facing stressors from pests, extreme weather, and commercial logging. NOGA offers an opportunity to better protect and restore old-growth forests, but only if it's finalized and implemented properly.

- \* NOGA should be amended to include passive management as an option for managing old-growth forests.
- \* NOGA should include a non-degradation clause for cases where proactive stewardship methods are employed.
- \* 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.
- \* NOGA should be amended to include a clear plan for recruitment of mature forests into old-growth conditions.
- \* NOGA should better characterize threats and more specifically prescribe management actions based on forest type and location.

I urge you to strengthen NOGA by clarifying its language and better considering eastern forests.