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First name: Carol

Last name: Lydon

Organization:

Title:

Comments: Thank you for allowing this time to comment. In my opinion, NOGA should be amended to include passive management as an option for managing old-growth forests. NOGA should also include a non-degradation clause for cases where proactive stewardship methods are employed.

The exceptions allowed under NOGA are unclear. This lack of clarity could lead to a situation where development within old-growth forests is permitted, so long as there is sufficient old-growth outside of the developed area to make up for some loss within the developed area.

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.

While old-growth forests decline, threats to old-growth increase. Simply preserving existing old-growth will not be enough to stop the decline, so recruiting mature forests into an old-growth stage is crucial to protecting these ecosystems. As written, NOGA does not offer a clear path by which the Forest Service can identify suitable mature forests and manage them to become old-growth. 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.

Thank you for your time!

Carol Ann Lydon