Data Submitted (UTC 11): 9/12/2024 2:44:25 PM First name: Maryanne Last name: Rackoff Organization: Title:

Comments: As written, NOGA fails to allow passive management as a method of preserving or enhancing oldgrowth characteristics. Although the Forest Service recognizes that a "hands-off" approach can better serve oldgrowth forests, especially in areas that are not fire-prone, NOGA currently prescribes only active management options.

Solution: NOGA should be amended to include passive management as an option for managing old-growth forests.