

Data Submitted (UTC 11): 9/12/2024 2:58:33 PM

First name: Laura

Last name: Collins

Organization:

Title:

Comments: I have concerns about the National Old-Growth Amendment (NOGA) that I would like to see addressed. 1. I am concerned about the lack of planning to not only save current old-growth, but to encourage mature forests into becoming old growth forests. NOGA should be amended to include a clear plan for recruitment of mature forests into old-growth conditions. 2. The current language is ambiguous about what constitutes a reason to degrade old-growth. NOGA should include a non-degradation clause for cases where proactive stewardship methods are employed. 3. 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. 4. Although the Forest Service recognizes that a "hands-off" approach can better serve old-growth forests, especially in areas that are not fire-prone, NOGA currently prescribes only active management options. NOGA should be amended to include passive management as an option for managing old-growth forests. 5. NOGA's one-size-fits-all approach to forest management 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.