

Data Submitted (UTC 11): 9/12/2024 4:17:44 PM

First name: Jimmy

Last name: Davidson

Organization:

Title:

Comments: 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. Current forests will burn on occasion, other forests need to be set aside to keep the land area even (or better yet, increase the land set aside for old-growth forests--if the pandemic era showed us anything, it's that there aren't enough lands set aside for ecological and recreational purposes--the current amount was overrun).

NOGA should better characterize threats and more specifically prescribe management actions based on forest type and location.