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Comments: As written, NOGA fails to allow passive management as a method of preserving or enhancing old-growth characteristics. 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.

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

Proactive stewardship of old-growth forests has the potential to degrade the old-growth ecosystem. The ambiguity of the draft text could lead to an interpretation that degradation of old-growth forests is ok if that degradation contributes to a project meeting other goals.

Solution: NOGA should 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.

Solution: 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.

Solution: NOGA should be amended to include a clear plan for recruitment of mature forests into old-growth conditions.

Lastly, NOGA prescribes a one-size-fits-all approach to forest management. As written, NOGA 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.

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