

Data Submitted (UTC 11): 9/16/2024 5:49:51 PM

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Comments: 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.