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Comments: 1. NOGA should be amended to include passive management as an option for managing old-growth forests. Active management is not always the best.

2. The ambiguity of the draft NOGA text could lead to an interpretation that degradation of old-growth forests is ok if that degradation contributes to a project meeting other goals. NOGA should include a non-degradation clause for cases where proactive stewardship methods are employed.

3. Simply preserving existing old-growth is not enough. Recruiting mature forests into an old-growth stage is crucial to protecting these ecosystems. NOGA should be amended to include a clear plan for recruitment of mature forests into old-growth conditions.

4. The draft NOGA prescribes a one-size-fits-all approach to forest management, characterizing 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.

Thank you for consideration of my comments.