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Comments: To Whom it May Concern,

The Forest Service must strengthen NOGA by clarifying language to eliminate loopholes that could inadvertently lead to worsened management of our country's old-growth. Additionally, NOGA should also better consider eastern forests, characterize specific threats across the United States forests, and more prescribe management actions tailored to forest type and location, informed by expert and indigenous input.

I have several concerns with the current language and propose appropriate solutions:

(1) Passive Management: As written, NOGA fails to allow passive management as a method to preserve or enhance old-growth characteristics. While the Forest Service acknowledges that a "hands-off" approach can benefit old-growth forests, especially in non-fire-prone areas, NOGA currently only prescribes active management options.

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

(2) Region-Specific Management Actions: NOGA currently adopts a one-size-fits-all approach to forest management, characterizing threats uniformly across the country. However, western and eastern old-growth forests face distinct challenges; for instance, fire is a significant risk in the west, while improper management and commercial logging threaten eastern forests.

Solution: Enhance NOGA to better characterize threats and specify management actions based on forest type and location.

(3) Clarity of Exceptions: "Proactive stewardship of old-growth forests has the potential to degrade the old-growth ecosystem." The draft text of NOGA is ambiguous and could potentially be interpreted to allow degradation of old-growth forests if it contributes to other project goals.

Solution: Include a non-degradation clause in NOGA for cases where proactive stewardship methods are employed.

Additionally, the unclear exceptions permitted under NOGA, could result in allowing development within old-growth forests under certain conditions.

Solution: Remove the exception allowing development at an "ecologically appropriate scale" and use clear, predefined language to improve NOGA's clarity.

(4) Identifying Mature Forests: It is crucial to recruit mature forests into old-growth stages to protect these ecosystems, as simply preserving existing old-growth will not suffice to halt their decline. However, NOGA lacks a clear pathway for the Forest Service to identify suitable mature forests and manage them towards old-growth conditions.

Solution: Amend NOGA to include a clear plan for the recruitment of mature forests into old-growth conditions.

I appreciate your attention to these concerns. May we create solutions with a bright and healthy future for all in mind.

