Data Submitted (UTC 11): 9/19/2024 4:00:00 AM First name: stephen Last name: Willig Organization: Title: Comments: NOGA should be amended to include passive management as an option for managing old growth forests.

Also, as written NOGA seems to allow for development within sections of some old growth forests. Old growth forests are such a rare ecosystem at this point that they should all be clearly protected.

Thank you