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Comments: I'm glad that the Forest Service is implementing the National Old-Growth Amendment (NOGA), but the amendment needs to be strengthened by clarifying its language and taking account of specific needs of eastern forests. A few ways it could be improved:

\*NOGA should be amended to include passive management as an option for managing old-growth forests, instead of only active management options in areas that are not fire-prone.

\*NOGA should include a non-degradation clause for cases where proactive stewardship methods are employed.

\*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.

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

\*NOGA should better characterize threats and more specifically prescribe management actions based on forest type and location. The same management actions that benefit fire-prone western forests will not be suitable for moist eastern forests.