

Data Submitted (UTC 11): 9/20/2024 4:00:00 AM

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Comments: I am commenting on the National Old-Growth Amendment (NOGA). I believe this amendment is an important step towards protecting a shrinking resource, but it needs to be improved. In its current form, NOGA lacks clarity and includes loopholes that could inadvertently worsen current management practices for old-growth forests. For example, 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.

A possible solution: NOGA should better characterize threats and more specifically prescribe management actions based on forest type and location.

Thank you for taking my comments and I hope you will do what is necessary to protect our trees for generations to come.

Rev. Michael Poulos

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