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Comments: NOGA is a step in the right direction, it lacks clarity and includes loopholes that could inadvertently

lead to worsened management of our country's old-growth.

Old-growth forests store large amounts of carbon, clean the air we breathe, maintain and increase biodiversity, filter water, and reduce wildfire risks. The old-growth forests of the Nantahala-Pisgah National Forests are home to several endangered and threatened species, including four species of endangered bats and the imperiled Blue Ridge lineage of green salamanders. Unfortunately, across the nation, old-growth forests are in decline, facing stressors from pests, extreme weather, and commercial logging. NOGA offers an opportunity to better protect and restore old-growth forests, but only if it's finalized and implemented properly.