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Comments: NOGA is an important first step to improving protections of eastern old growth forests. However, I believe the following changes need to be made to improve the efficacy of the amendment. These include:

1. NOGA should be amended to include passive management as an option for managing old-growth forests.
2. NOGA should include a non-degradation clause for cases where proactive stewardship methods are employed.
3. 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.
4. NOGA should be amended to include a clear plan for recruitment of mature forests into old-growth conditions.
5. NOGA should better characterize threats and more specifically prescribe management actions based on forest type and location.