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Comments: Old growth identification varies by stand makeup and location, and should be identified and managed at the National Forest level through the Forest Plan process involving local public input.

Fuels management should dictate the balance between timber harvest and controlled burns to provide a healthy safe forest environment. Once a target age achievement based on stand specie content is established to qualify as old growth, a fuel reduction schedule can be established for thinning operations to control safe fuel levels during the growth period. Controlled burns can be conducted during this period after stands have been thinned to a fuel loading level that is safe to burn based on topographical limits.

Once old growth is achieved, some stands may need selective harvest and controlled under burning to maintain forest heath until some future date when the old growth can be cut to avoid insect, disease, or wildfire destruction of the old growth stands and possibly adjacent healthy stands of timber. There will need to be replacement old growth stands scheduled in the planning process if there is a target acreage for old growth on the Forest. The Forest Service cannot safely burn its way to forest health and maintain the objectives of other resource values like recreation, wildlife, water quality, air quality, historical sites, visual quality, etc., unless the major fuel reduction is established through active timber management first, with controlled burning as a supplement. It may be easier and less costly to schedule controlled burns than planning timber harvest, but that is not doing the right thing in proper management of our public lands protecting a consistent level of old growth timber while minimizing wildfire impacts. Bill Mulligan ATTACHMENT: Scan0173 (uploaded the same document twice) - comments; pasted into text box and coded