Data Submitted (UTC 11): 8/3/2021 11:56:43 PM First name: Francis Last name: Mangels Organization:

Title:

Comments: You gotta be kidding, BNF. You propose to restore and preserve old growth with a SEED TREE CUT? Even less than a SHELTERWOOD CUT? WOW, WHAT FORESTERS!

Furthermore, Your BIG mistake is saying old growth is defined by age. The Textbook USFS definition of old growth is LARGEST TREES, keep 70% CANOPY CLOSURE. Smaller trees may be removed, especially the older ones, because the runt old trees almost never grow to reasonable commercial log size, not to mention never will be old growth. Bluntly, you have the wrong definition by the book.

I ought to know....I managed old growth for many years with USDA