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Comments: I completely agree with the Old Growth Forest Network's approach to identifying old growth forest: "As a pragmatic person, I suggest that instead of spending time on a definition, first determine where the federally owned older forests are still located. To simplify that process, begin by not trying to separate "mature" from "old growth." 'Years since last harvest' is the simplest way to identify mature and old-growth on federal lands.

Ninety-nine percent of our national forest land was acquired between 1891-1939. This means that almost all our national forests would be a minimum of 82 years old if they had never been harvested since acquisition, and most would be much, much, older than that. Many foresters and conservationists have suggested that 80 years is a reasonable age at which to consider a forest 'mature.' Therefore, any unharvested national forests would either be mature or old-growth.

I also agree on management: "1. National forest lands that have never been harvested should be considered 'climateforests' and remain undisturbed by thinning and harvesting.

2. If a national forest has less than fifty percent of its land in this category (not harvested since acquired), younger forests should be identified that will be allowed to age and bring the total acreage of 'climate-forests' to at least fifty percent.

3. Climate-forests should not be thinned in the name of 'wildfire control.' Recent research has shown that older, protected, forests are less vulnerable to intense fires, and the most vulnerable are the younger forestsv. Therefore, if thinning and

prescribed burns are considered for the Urban-Wild Interface they should not be done in the 'climate-forests'. Instead, these treatments should be focused on the younger forests, and more should be done to educate and control humans - the number one cause of wildfires. In the event of wildfire climate forests should not be salvage logged.

4. Climate forests should not be salvage logged after a wildfire since large amounts of carbon are held even in fire-killed trees.

5. Climate forests should not be cut or chemically treated to control native insects. Chemical control is acceptable only for non-native invasive insects.

6. Climate forests should not be silviculturally treated, even to advance old-growth structural characteristics since some old-growth characteristics emerge only with sufficient time. For example. it takes time for large coarse woody debris to develop even with silvicultural manipulations, or for logs to reach advanced stages of decay. "