Data Submitted (UTC 11): 7/28/2022 12:00:00 AM

First name: Anon Last name: Anon Organization:

Title:

Comments: With their increasing scarcity and threat from climate change, old-growth forests should be defined simply as any area forested with the climax species for their ecosystem. The definition should also encompass areas that are in a stage of the succession process close to regaining climax status. For example, in subalpine Colorado mountains, a beetle-impacted mix of live and dead lodgepole pine fosters generation of subalpine fir and Englemann spruce seedlings leading to return to that climax-species mix. Both "pre-climax-" and climax-species forest areas should be cherished and protected as old-growth forests.