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Comments: As a retired horticulture photographer, I have spent a lot of my work time in university trial fields, farms, gardens and nurseries. My free time in the Pacific Northwest forests. As you develop criteria for Oldgrowth" forests, please include more than just the live older trees. Much of forest life depends on the entire life cycle of the trees.

Please include all the stages and types of plants in the multi-story canopy - all layers of living plants, shrubs and younger trees growing under the larger, older trees. Leave the large dead trees, the snags, and large trees that have fallen on the ground or in streams.

Keep all that is essential for the health of an old growth forest - the trees and the myriad of animal, avian, insect, flora, fungi and more.