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Comments: I am writing about the definitional framework. I am concerned that the definition of "old growth" forest will be too focused on age, thereby precluding the possibility of protecting forests that have been destroyed by fire or salvage logging that do not meet the age threshold. Also, the value of primary forests needs to be considered. We need to protect forests that have experienced wildfire but are naturally rejuvenating. To often, those forests are needlessly subject to salvage logging, which increases CO2 emissions.