Data Submitted (UTC 11): 8/12/2022 4:58:17 PM First name: David Last name: Knibb Organization:

Title:

Comments: Conserving mature and old-growth forests is critical. So little of them are left, yet they are important for so many ecological reasons and as a natural buffer against climate change. These forests should be excluded from allowable cut calculations and off-limits to commercial logging.

Generally you can define mature and old-growth forests based on age, but that age necessarily will vary from one ecosystem to another. Obviously, oaks in Virginia are different from Douglas fir on the West coast. On the west side of the Pacific Northwest, I suggest than an age of 100 years is a good working definition.