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Comments: "Old Growth" forests should be identified by an actual age restriction. not a size class limitation. If a sampling of trees with an increment borer comes up with an average of greater than 350 years go ahead and offer protections. Most of these areas are already protected and additions would be minimal as it is atypical for trees to live that long in most places. Other than that there should be no "Old Growth" protections.

A size class limit can grossly misrepresent a tree's age. There are numerous stands across Region 1 of the USFS that could be classified as "Old Growth" under a 30" diameter size limit that have been previously harvested by man.