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Comments: Define old-growth forests at a landscape scale and at an ecosystem scale. One acre of forest that meets a tree-by-tree definition for large trees will not confer the benefits of a 300-acre landscape, for example, where an intact ecosystem and its natural disturbances have been at play for a century. The legacy effects of wildfire, insects, and disease, commonly occur in mosaics across a landscape. The ecosystem time-scale involved is long-it includes time for disturbances to kill trees, and for those trees to fall to the forest, cycling nutrients back to the soil and providing openings where new trees and shrubs can grow to create a multi-story structure.

Logging is currently the biggest threat to old growth and mature forests. The largest trees store the most carbon. When a tree is logged, the majority of the carbon that tree was storing is released into the atmosphere, either immediately or in the short term as these products end up in landfills; only a fraction of the carbon that a living tree stored ends up in any long-term storage in the form of lumber. For these reasons, logging emits more carbon than wildfire, up to three times more carbon can enter the atmosphere than the wildfire that logging will purport to reduce. Wildfire is a natural disturbance for old growth; logging is not.

In sum, please define old growth at a landscape level and with an ecosystem time scale. Impose a moratorium on logging old growth. Keep mature and old growth forests standing for the climate, for the wildlife, and for ourselves.