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Comments: I have been an employee of the NPS in AK and FL. I also worked for AK State Parks and worked at several NGO's later in Homer, AK. I have backpacked extensively in the PNW, so I am well acquainted with mature and old growth forests.

I recommend that you establish 120 years old as a baseline for your definition of old growth. In WA this is a reasonable age, and I believe the same would apply to AK. I also endorse 80 years as baseline for "mature" forests, at least in the Pac NW and AK. Prior to the end of WW II there were very few logged forests -- if any -- that were not naturally regenerated forests. There were a number of young trees that were 20 years old or more that remained after a harvest. These trees would be c. 100 years old now, well on their way to old growth status.

Please put special emphasis on this forest category. And thank you for the opportunity to express my opinion. As a former NPS employee, it is important to comment.