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Comments: Old Forest definitions must be based on pre-settlement conditions. Many stands have been on a fire exclusion trajectory. Tree species reflect this as shade tolerant species have increased and frequently dominate. Simply defining old forest by the size and or age of trees would not account for this false trajectory.

In the western US, the reduction of wildlife risk must be considered. This must allow for treatments in old forest and the surrounding landscape.

Treatments must allow for the removal of shade tolerant trees species, no matter size, in frequent fire return stands. This requires harvest removal. Old forest stands must be set up to grow back into presettlement conditions.