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Comments: A sensible and science based definition for "old growth" should be determined. "Old growth" should not simply be bigger trees but should have a minimum age of maybe 200 + years and also include stand structure components (multi-layered canopy etc.) Just because a tree is 30"+ in dbh does not mean it is "old growth". The forest industry in general is not interested in trees larger than ~ 50" dbh due to the difficulty of handling/processing. Larger trees in the 30"-50" range should still be available for management to include timber harvest as these trees may be as young as 60-80 years.

Old growth stands should still have management allowed as may be necessary to maintain forest health and reduce wildfire hazard. Prohibiting any active management actions will not produce positive results in the long run. Just letting nature take its course is what our vast National Parks are for. Thank you for the opportunity to comment.

Aubrey Stargell