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Comments: I am a forester for the Olympic National Forest located on the Olympic Peninsula in western Washington state. I am tasked with implementing our timber projects and meeting resource management objectives. The Olympic Forest/Peninsula definitely has it's fair share of traditional "old growth" as the landscape is extremely rugged, undeveloped, and lacks fire as a common disturbance. In Region 6, all of our timber projects have been subjected to the Northwest Forest Plan and largely, if not entirely, habitat restoration based. This essentially means that Region 6 manages second growth stands nearly exclusively to accelerate "old growth habitat" based on pre-colonial conditions. On the Olympic NF, we take our restrictions further than some Forests in our Region and buffer old growth in order to further protect it rather than just exclude the old growth stands from harvest. It is my concern that a single definition applied nationwide would have contradictory affects to our own restoration projects. The western Cascades are very productive timber grounds and even plantation 2nd growth stands can produce large trees. I also acknowledge that our definition of "old growth" would not fit the eastern Cascades well nor other regions of the nation. Regarding a single "nationwide" definition of old growth, I would definitely suggest excluding individual tree measurements. The landscapes and ecotypes vary so much and the good intentions would have enormous consequences to forest management and restoration efforts. My recommendations for a single definition would be something flexible and condition based for the diverse ecotypes across the landscapes. I would also suggest including an area dimension to prevent individual trees which were commonly left as "seed trees" within clear cut stands. Individual trees would need buffering on the Olympic above and beyond what some other forests in our own region implement. My own humble attempt to apply a single definition of "old growth" would possible read, "A stand which exhibits climax successional characteristics based on the respective ecotype which the stand resides and a minimum dimension of 5 sq/acre." Of course I acknowledge this does require some follow up defining climax conditions of each ecotype but I would highly recommend an emphasis on flexibility rather than specific biometrics.