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Comments: The USFS definition of "old growth", as it applies to trees and to complete forests or fragments thereof, should be guided by the paper by:

Leighty, Wayne W., Hamburg, Steven P., Caouette, John

Source: Ecosystems 2006 v.9 no.7 pp. 1051-1065

"Effects of Management on Carbon Sequestration in Forest Biomass in Southeast Alaska",

<https://pubag.nal.usda.gov/catalog/525435>

More C is sequestered in the soil than in the trees of mature old growth forests, and thus all mature forests, especially undisturbed forests, should be considered "old growth" and should not be harvested nor disturbed except for prescribed burns for understory management, attempting to emulate occasional "natural" burning, to prevent over-accumulation of fuel in the forest understory.

The Tongass is the most important example of where old growth forest logging or other disturbance should cease completely and immediately, interpreting the analyses of the aforementioned research paper.

Thank you for your consideration.