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Comments: Old growth definition must include soil microbiota conditions. These life forces are the slowest to reestablish after any disturbance so their presence indicates longevity on the landscape.

The definition needs to be from the forest's point of view - what requirements establish a baseline of multidimensional assets that make up a forest. This must include all aspects from deep within the soil to the bacteria and viruses present in the tops of the canopy a horizontal and vertical spatial scale as well as a temporal scale.

Following on that, the human point of view of "old" and "value" need not be incorporated into the definition. The forest must be examined and defined through the lenses of the many disciplines of the forest, not simply human outsider concepts.