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Comments: It is vitally important that definitions used for this exercise be based on ecological criteria rather than political criteria. Forest Service ecologists developed ecological definitions for old growth specific to formal plant series and plant association groups approximately 25 years ago. These definitions should be used, or updated where new research indicates better criteria, where available, and used as a template for other plant series across the country where not currently available. Arbitrary age-based criteria , such as 80 years old as advocated by some environmental groups in the PNW, should be avoided. 80 year-old forests in the PNW are generally still relatively young with simple stand structure, and do not contain the features described in the scientific literature for old-growth forests.