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Comments: I would like to encourage the Agencies to take an inclusive approach to define old-growth and mature forests because old growth can never be completely protected. In practical terms, defining old growth largely comes down to what kinds of disturbances are acceptable within old-growth forests. I encourage the Agencies not to focus too much on tree age and to include areas subject to recent natural disturbances.

I believe focusing definitions on mature forests and making the degree of anthropogenic disturbance a key criterion will help the definition framework remain useful as climate change alters forests. I also encourage the Agencies to base the inventories on existing regional inventories and ground truthing as much as possible. Where modeling is necessary, correlating mature forests with canopy height estimated from climatic variables and physical site conditions should provide robust predictions