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Comments: Thank you for the opportunity to weigh in on this important matter.

I encourage the Agencies to:

- *Support complete implementation of the executive order and conservation of old-growth and mature forests;
- *Use an inclusive definition framework that errs on the side of considering more forests old growth or mature;
- *Define old-growth based on old ecological processes rather than just old trees (i.e., include forests that have never been logged but have been subject to disturbances like tornados or wildfires);
- *Incorporate existing regional old-growth forest inventories

I 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. We encourage you to 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.

Thank You,

J.D. McCrary