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Comments: President Biden used the terms "mature" and "old growth" 10 times before directing the Secretaries to define them. Clearly the President already knows what they mean, as he has firmly stated his policies about them. MY first suggestion is to ask his staff what they meant when they spent a large part of the Executive Order talking about mature and old growth trees.

Failing that, my second suggestion is DO NOT TRY TO INVENT A NEW DEFINITION! The 1989 Chief's definition is great. Numerous respected and classic forestry textbooks can give you more definitions. If you come up with something new, you will only give the litigious environmental community a new avenue to slow down the very protective management that the President wants to pursue.

As far as identifying and inventorying, each forest already has the data to do that. Give each forest some general guidance and let them crunch the numbers. Be very careful you do not create another decades-long process that overwhelms the forests and takes their meager budget dollars away from REAL work they should be doing! This thing could be very dangerous if you are not careful.