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Comments: Advances in space borne remote sensing have new and novel potential to be used in inventorying old-growth forests within the United States. The NASA Global Ecosystem Dynamics Investigation (GEDI) is a waveform lidar instrument aboard the International Space Station. Since 2019, GEDI has been providing waveform lidar retrievals for land regions between roughly 50-degrees N and and 50-degrees S. The retrievals provide information on structural features from the ground surface to the surface, i.e., a forest canopy, for 25-meter 'footprints'. The GEDI mission produces several products that can be used for old-growth mapping and monitoring applications, these include canopy height metrics, biomass, and the vertical profile of stand structure. Combined with training data from forest inventory plots, GEDI would provide almost complete wall-to-wall coverage of forest structure information within the lower 48 conterminous United States. The products of biomass and vertical structure also pose an internally consistent framework for evaluating differences in old-growth definitions and contrasting those that focus on high-biomass systems with those that focus on vertical structure and complexity.