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Comments: Given the vast differences in soil, moisture and other environmental conditions effects the growth of trees. An 17 year old tree may be 15" in diameter or 30" in diameter. Every forest in the country had diverse climates and micro climates. Each forest needs to define it's own category of old growth and even to have different definitions of old growth within the individual forest. This concept is something that needs much more time and science consideration in order to develop the different definitions that would cover old growth. I request that the development of such definitions be extended to allow for much more discussion and consideration.