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Comments: Our organization fully supports efforts to identify and protect the remaining old growth forests on USFS and BLM land. The Wisconsin DNR has determined through Forest Inventory & Analysis data and through local surveys that only 1% of Wisconsin's current forests are defined as old growth (stands greater than 10 acres with trees over 150 years old).

We recommend looking at all sources of information including published literature, agency documents, NGO documents, & university expertise to help define old growth for all the different ecological regions of the U.S.

ATTACHMENT: DNR Old Growth Characteristics.pdf

ATTACHMENT: Old Growth and Old Forest Handbook 2480-5.pdf