

Data Submitted (UTC 11): 7/21/2022 6:41:34 PM

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Comments: FIA data is not appropriate for an old-growth inventory as the scale is too broad. Number of large trees per acre is a key component. For example, 2 or more trees >30 in DBH per acre is a starting point. The DBH limit would be based on tree life history of the dominant late-climax species present in a given habitat type, and this will vary by region, site productivity, and tree species physiology. While old growth forests are variable, the size of tree contributes to many of the key structural characteristics and beneficial services of old growth forest.