Data Submitted (UTC 11): 7/20/2022 12:00:00 AM First name: Ray Last name: Hicks Organization:

Title:

Comments: Old growth should be defined by size, age and disturbance history.

Age- Forests considered as old growth should contain consist of canopy trees that are > 50% as old as the normal life expectancy of their respective species.

Size- old growth forests should contain trees that are larger in both height and diameter than average second growth stands on their respective sites. They should possess a basal area and canopy density that is typoof fully stocked stands of the respective species.

Disturbance History- Old growth stands should not have been subject to commercial timber Ploperations in the last several decades, to the extent that visible remnants of harvesting (stumps, roads, etc.) are not obvious to untrained observers. Also, downed wood should have been left in place and not "cleaned up." Ray Hicks, Emeritus Prof of Forest Ecology, West Virginia University