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Organization: Colorado Parks and Wildlife

Title: Habitat Conservation Supervisor

Comments: Dear Mr. Barbour, Colorado Parks and Wildlife's (CPW) statutory mission is to perpetuate the wildlife resources of the state, to provide a quality state parks system, and to provide enjoyable and sustainable outdoor recreation opportunities that educate and inspire current and future generations to serve as active stewards of Colorado's natural resources. This mission is implemented through our 2015 Strategic Plan and the goals it embraces which are designed to make CPW a national leader in wildlife management, conservation, and sustainable outdoor recreation for current and future generations. The United States Forest Service (USFS) and Bureau of Land Management (BLM) in Colorado are valued partners in the conservation of wildlife and wildlife habitat, access to public lands and waters, and in the management of outdoor recreational experiences and opportunities. CPW appreciates the efforts of both the agencies to address the definition, identification, inventory and management of old growth/mature forest stands on our public lands. This forest condition class in Colorado is under-represented, however, it is vital to many wildlife species. We offer the following specific recommendations on the questions provided.

* What criteria are needed for a universal definition framework that motivates mature and old-growth forest conservation and can be used for planning and adaptive management?

We feel that definitions of both old growth and mature forest should be based on a combination of the following factors: individual forest type, existing and future disturbance regimes, tree age, tree growth characteristics, tree composition, site productivity, and a minimum stand size. In addition, we feel that replication of this forest stand condition across the Southern Rockies is an important aspect to consider within each forest type definition. All of these factors are important for the development of old growth/ mature forest that benefit a variety of wildlife species in Colorado.

* What are the overarching old-growth and mature forest characteristics that belong in a definition framework?

CPW believes that both old growth and mature forest characteristics should be based on forest type and include, the presence of old and/or large trees, multiple canopy layers, dead and down woody debris and standing snags (in various decomposition condition classes), intact native understory of plants, intact soils and the presence of indicator wildlife species. An additional characteristic that we recommend being included in the definition is the degree of human disturbance. With increased recreational pressure on public lands in Colorado, the degree of human disturbance and use should be a measured characteristic of old growth/mature forest.

* How can a definition reflect changes based on disturbance and variation in forest type/composition, climate, site productivity and geographic region?

* How can a definition be durable but also accommodate and reflect changes in climate and forest composition?

CPW recommends some type of qualitative rating of old growth/mature forest based on condition class of each stand. Those forest stands that meet all characteristics of either old growth or mature receive the highest condition class ranking, while those stands that meet a few of the characteristics receive a lower ranking. This type of qualitative condition class rating should be completed in the field by appropriate agency staff. This will allow for monitoring of old growth/mature stands over time and allow for adaptive management of this important forest condition class. One of the objectives for management associated with old growth and mature forest conditions should be long term stability of those forest stands. In addition, we recommend a management plan be developed to ensure the protection of old growth forest structure and conservation/expansion of mature forest structure for the benefit of wildlife and all Coloradans. CPW appreciates the efforts of both the USFS and BLM to improve and coordinate the management of old growth/mature forest and welcomes further collaboration on this important topic once the agency develops old growth definitions and criteria for management. We recommend referencing Colorado's State Wildlife Action Plan

(<https://cpw.state.co.us/aboutus/Pages/StateWildlifeActionPlan.aspx>) and Forest Action Plan

(<https://csfs.colostate.edu/forest-action-plan/>) for more details. If you have any questions or would like to discuss further, please contact me at reid.dewalt@state.co.us. Sincerely, Reid DeWalt Assistant Director of Aquatic,

Terrestrial and Natural Resources