Data Submitted (UTC 11): 8/24/2022 3:25:53 PM First name: Deborah Last name: Williamsoon Organization: Title:

Comments: Old-growth piñon-juniper forests are home to more than 70 bird species and are often the only suitable habitat for many of these species, whose populations are currently declining rapidly under intense pressure from climate change, development, and drought.

Although they cover hundreds of millions of acres and provide irreplaceable habitat and ecosystem benefits, piñon-juniper forests are among the least studied and most ignored North American forest types. The BLM should ensure that its inventory and criteria for mature and old-growth forests include piñon pine and juniper forests, which are the largest forest type by acreage managed by the agency.

Please ensure that you properly inventory these forests!