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Comments: It is critical that we permanently protect mature and old growth forests across all federal lands and, for wild lands in Utah, to emphasize the importance of protecting old-growth dryland forests of piñon pine and juniper.

I urge the Biden administration to conduct a comprehensive inventory of mature and old-growth piñon pine and juniper forests on the Colorado Plateau during this first stage of implementing the president's executive order. It is important that ALL old-growth and mature forests, in dryland ecosystems as well as the better-known alpine and Pacific Northwest environments, are conserved for the benefit of wildlife, air and water quality, climate adaptation, and so much more.

Piñon pine and juniper forests cover 15% of five states--Arizona, Colorado, Nevada, New Mexico, Utah--and are subject to temperature extremes and limited moisture availability. Often they are the sole woodland provider of wildlife habitat, vegetative cover, watershed protection, and traditional food and medicine gathering in dryland and arid BLM-managed lands across the West.

Single-leaf piñon pine trees can reach ages of up to 600 years and junipers can reach ages of up to 1,600 years, representing some of the oldest beings on our planet. They are worthy of all possible protections, simply on their own account.

The piñon pine and juniper forests are historic forests that are crucial for resisting climate change. Their crusts store a disproportionate amount of carbon in dryland ecosystems, and are more resistant to disruptions caused by climate change.

These old-growth forests are crucial for our work to preserve species and species diversity, being home to more than 70 bird species and often being the only suitable habitat for many of these species. Many of these bird populations are declining rapidly under intense pressure from climate change, development, and drought.

Piñon-juniper forests are among the least studied and most often ignored forests in the United States, despite covering hundreds of millions of acres and providing irreplaceable habitat and ecosystem benefits. The BLM must 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 ask the Biden administration to properly inventory and protect old growth and mature piñon-juniper forests in Utah. Please ask the Biden administration to include in its assessment an inventory and management plan taking into account the threats to these forests: landscape-level mechanical deforestation projects, cattle grazing, and other "development" and building projects that indiscriminately remove trees. Please urge the Biden administration to make sure these ancient piñon-juniper forests and their characteristics are included in any nationwide definition of mature and old-growth forests, which will then be used to protect these areas including the Redrock Wilderness.