

Data Submitted (UTC 11): 8/25/2022 3:03:32 AM

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Comments: Please conduct a comprehensive inventory of mature and old-growth piñon pine and juniper forests on the Colorado Plateau during the first stage of implementing the president's executive order. Include all old-growth and mature forests, in dryland ecosystems as well as the better-known alpine and Pacific Northwest environments, to be conserved for the benefit of wildlife, air and water quality, climate adaptation, recreation, and cultural natural resources.

Covering 15% of the land area in five states (Arizona, Colorado, Nevada, New Mexico, and Utah), piñon pine and juniper forests are subject to temperature extremes and limited moisture availability. Those forests are often 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. Juniper trees can reach ages of up to 1,600 years. Those old-growth forests and associated undisturbed biological soil crusts store a disproportionate amount of carbon in dryland ecosystems. They are more resistant to disruptions caused by climate change.

In addition, 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 adverse effects of 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 needs to ensure that its inventory and criteria for mature and old-growth forests properly include and evaluate piñon pine and juniper forests, which are the largest forest type by acreage managed by the agency.

A proper inventory and evaluation will result in actions that protect old growth and mature piñon-juniper forests in Utah and other western states.

There are many threats to piñon-juniper forests on western public lands, including landscape-level mechanical deforestation projects (mainly for the benefit of cattle grazing) that indiscriminately remove trees, including many individual trees that have been in those forests since long before Europeans landed on this continent. Make sure the old-growth piñon-juniper forests and their characteristics are included in any nationwide definition of mature and old-growth forests, which can then be used to properly protect these areas and the associated redrock wilderness.

Please map and define old-growth and mature forests managed by BLM across America's public lands. Carefully consider how policy decisions and recommended actions will properly protect those forests and mitigate climate change, logging, development, and other potentially adverse impacts.