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First name: Jean Last name: Naples

Organization: Retired Physician and Public Health Researcher

Title:

Comments: Dear Bureau of land Management,

I am writing as a physician and public health advocate who has experienced the environmental destruction due to the worsening climate change disaster crisis, and strongly support full protection and conservation for our climate to fully protect old growth forests from any industrial logging.

Our national old growth forests in the Southwest, cover 15% of the land area in five states (Arizona, Colorado, Nevada, New Mexico, and Utah). These forests, which include piñon pine and juniper forests are subject to temperature extremes and limited moisture availability and these old growth trees 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.

In these Southwest old growth forests, single-leaf piñon pine trees can reach ages of up to 600 years and juniper can reach ages of up to 1,600 years. These historic forests and associated undisturbed biological soil crusts store a disproportionate amount of carbon in dryland ecosystems, and are more resistant to disruptions caused by climate change.

I strongly urge full conservation for these old growth forests because old-growth piñon-juniper forests provide a much needed homes to more than 70 bird species including Pacific-slope Flycatcher, Pacific Wren, Varied Thrush, Golden- crowned Kinglet, Wilson's Warbler, Pileated Woodpecker, Hutton's Vireo, Steller's Jay, Swainson's Thrush, Chestnut-backed Chickadee, Hermit Warbler, Dark-eyed Junco, Brown Creeper, Redbreasted Nuthatch, and the Hairy Woodpecker,

It is crucial to understand that these old growth trees are often the only suitable habitat for many of these species, whose populations are currently endangered and 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

At this time, I am deeply concerned about the logging threats facing our mature forests and am encouraged by President Biden's recent executive order recognizing their critical importance in the fight against climate change.

To permanently end logging threats to the climate and biodiversity values of federal forests, I am strongly urging you to please define mature and old-growth forests to include all stands and trees older than 80 years. To ensure full protection for our old growth forests from destruction due to industrial logging it is critical that you move quickly to propose a rule that would protect these trees and forests from all industrial logging. I strongly urge the Biden administration to please initiate and conduct a complete inventory of these old growth forests to ensure full protection for the old growth and mature pinon, juniper forests in Utah.

As we are all aware, these vital forests fight climate change by removing and storing carbon naturally, protecting drinking water for our communities, and providing habitat for at-risk wildlife. But these public lands are under threat by timber companies. When these mature trees are logged and processed, much of their stored carbon is rapidly released, and recapturing it through forest regrowth takes decades or centuries to recover.

At this time, I thank you for your consideration of my letter and request. Because of the fact that the climate change disaster crisis continues to worsen on a daily basis in our country and around the world, our country must initiate urgent federal initiatives to direct the regrowth for our old growth forests. I strongly urge you to please direct all needed federal action to ensure full protection for our mature forests before these forests are permanently destroyed, forever due to industrial logging activities.. It is critical, at this time, for the Biden administration to please initiate and conduct a complete inventory of these old growth forests to ensure full protection for the old growth and mature pinon, juniper forests in Utah.

Sincerely, Jean Marie Naples, MD-Ph.D.