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Comments: I strongly 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 very 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, carbon sequestration, and so much more.

Please carefully consider these key points:

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. These 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 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.

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.

BLM should reconsider its improper and harmful bias toward the eradication of pinyon juniper habitats to increase forage for commercial livestock and big game species. These vegetation treatment projects are increasingly risky during this prolonged drought and may facilitate the continued colonization and spread of cheatgrass and other destructive invasive plant species.

Thank you very much for considering my comments.