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CALIFORNIANS  
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WILDERNESS



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Submitted via email: [blm\\_wo\\_forestry@blm.gov](mailto:blm_wo_forestry@blm.gov)

Re: Management and Conservation of Pinyon and Juniper Woodlands

To Whom it May Concern,

We, the undersigned organizations, submit these comments for the ongoing public comment period on the management of pinyon and juniper woodlands. The Bodie Hills Conservation Partnership (the Partnership) is a coalition of organizations working toward the permanent protection of the Bodie Hills in California, an American treasure with exceptional scenic, historic, recreational, and ecological values. We are working to create a healthy, sustainable future for the Bodie Hills that combines conservation and public access, preserves current uses, and promotes the region's scenic beauty for the economic benefit of local residents. We emphasize the protection of natural resources in the region as the Bodie Hills have served as a climate refugia throughout the droughts of the Holocene and can continue to be a climate refugia for the Bi-state Sage Grouse, Pinyon Jay and many other wildlife and vegetation, including the pinyon pine. Vegetation in the Bodie Hills is dominated by a mix of sagebrush and mountain shrub ecosystems interspersed with pinyon-juniper woodlands, which are thus of key importance to members of the Partnership, with a large number of mature and old growth stands.

We support Executive Order 14072, Strengthening the Nation's Forests, Communities, and Local Economies, which sets forth the Biden administration's policy to conserve America's mature and old-growth forests on federal lands. We especially appreciate the efforts to inventory these forests, analyze threats to them, and develop policies to institutionalize climate-smart management and conservation strategies, providing an opportunity to uplift pinyon juniper ecosystems, which have too often been overlooked and managed for other uses. This inventory has identified pinyon pine as the most abundant old-growth forest type on Forest Service and BLM lands, with 24 million acres of mature and old-growth pinyon and juniper woodlands on federal lands. Managing these largely overlooked and numerous forest landscapes for conservation and climate change offers great opportunity for meaningful policy change and, as organizations dedicated to the health and sustainability of one such landscape, we will be following emerging pinyon management information and policies closely.

Pinyon pine reach sexual maturity around 75 to 100 years of age, only beginning to produce cones around 35 years of age, making these forests, and the many people and wildlife that rely on them for food, shelter, and more, especially vulnerable to stand disturbances. Humans, deer, bear, and bighorn sheep thrive on the pine nuts which are rich in protein and fats, as do birds such as Steller's Jays, Clark's Nutcrackers, and, a topic of conservation concern at the May 8th and 9th workshop: the Pinyon Jay. The pinyon jay population has shrunk by an estimated 85 percent since 1970<sup>1</sup>, with a driving cause suspected to be widespread destruction of pinyon-juniper forests on public lands. In future workshops, presentations, and other information gathering formats hosted by the federal government, we would like to see this destruction, and the management techniques that are causing the destruction, (such as clearing for development, including mining, and chaining for livestock grazing), discussed further as part of not only the larger context of threats to pinyon juniper woodlands, but also as part of the decision making of local federal government representatives. We are thankful for the work of the BLMs Public Lands Rule for formally placing conservation on equal footing with other uses for the first time, and would like to see this policy elevated across agencies as the Biden administration and

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<sup>1</sup> Partners in Flight Database

beyond pursue environmental protections and stewardship in the face of climate change and landscape degradation.

One threat that has been able to run rampant in pinyon ecosystems, especially in Nevada, is mining and mineral exploration. While there is no active mineral exploration on the California side of the Bodie Hills, there are several projects threatening pinyon ecosystems on the Nevada side, and it is well known that mineralization occurs on both sides of the state line. There are currently three active gold exploratory drilling projects that have been approved by the United States Forest Service in the Bodie Hills: the Bald Peak, Sawtooth Ridge, and Spring Peak projects, and one that is in the process of being approved, the Polaris project. Another exploratory drilling project on Section 16 State Lands on the Dry Lakes Plateau in the Bodie Hills is on hold for one more year due to a State Lands Commission mineral exploration moratorium. It would be the fifth drilling project in the Bodie Hills. Headwater Gold, the company drilling at Spring Peak, is also currently filing claims on both the California and Nevada sides of Dome Hill and has submitted a Plan of Operations to the Forest Service for their Lodestar project to drill on the south slope of the Aurora Crater.<sup>2</sup> The Sawtooth Ridge exploratory drilling project was approved to clear cut 700 pinyon trees alone, and our preliminary estimates for the three drilled sites, (of the 13 approved), point to the number of trees removed being even higher. These drilling projects were all approved as Categorical Exclusions and any one or all of these exploration projects could become an active mine in 20 years, leading to further pinyon pine and juniper woodland deforestation.

Another matter of conservation concern and potential conflict with pinyon pine conservation, the Bodie Hills are the great stronghold for the Bi-state sage-grouse (BSSG), a distinct population segment of the Greater sage-grouse, which have been petitioned for protection under the Federal Endangered Species Act on and off for almost 20 years, during which time conditions and threats for both the distinct population segment and the Greater sage-grouse have only been amplified and worsened. BSSG populations continue to struggle across the board and all but the Bodie Hills stronghold population have seen continued long term losses. While the Bi-state sage-grouse Local Area Working Group (LAWG) has been working tirelessly to combine the efforts of agencies, conservationists, ranchers, concerned citizens, and

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<sup>2</sup> Headwater Gold, Dome Hill <https://headwatergold.com/dome-hill-nevada/>

local tribes towards the stewardship of the species, threats beyond the control of LAWG actions such as climate change and wildfires, habitat fragmentation, and development all continue, threatening to push the distinct population segment to extinction. While we support the continued stewardship and management of sagebrush ecosystems for the restoration of the BSSG, we will echo sentiments expressed in the workshop regarding the nexus of BSSG and pinyon conservation. Firstly, pinyon tree removal has too often been applied without surgical consideration towards the best habitat for BSSG, leading to needless pinyon pine deforestation at a time when wildfire, development, and climate change are all affecting the life cycle and viability of pinyon pine. Secondly, this work has too often been done without collaboration of local tribes who rely on these landscapes for multiple cultural and sacred uses. This results in projects applied without the full information on the site and local needs/values, as we have seen locally in the Bodie Hills and beyond, the result of which lead to the creation of the Bi-State Tribal Natural Resources Committee (BTNRC), formed from the collaborative process between the Nevada Indian Commission, interested tribal members, and members of the Bi-State Executive Oversight Committee in 2015 to develop the sound management of natural and cultural resources, including tribal cultural values. While this is a powerful start, such opportunities need to be developed and deepened across pinyon-juniper woodlands on federal lands, across threats and differing management priorities. Finally, if pinyon pine conservation and BSSG, or other species conservation efforts, are found to conflict, it is of critical importance that these treatments be applied with due consideration for the larger context of other threats and degradations affecting these ecosystems. While time is of the essence in the protection and stewardship of species and landscapes of concern, we must gather detailed information and weigh the benefits and harms, as, once lost, it is far harder to restore, especially for a species that takes at least 75 years to fully be able to reproduce and recover.

We appreciate the work done by the BLM and USFS to host the May 8th and 9th workshop both in person and virtually, and especially appreciate the diversity of speakers and quality of the information shared. We support the sentiments shared by tribal representatives at the workshop and encourage federal agencies to not only include this information at the data gathering stage, but to continue these conversations and turn them into tribally lead and culturally appropriate conservation strategies. We would like to once again call attention to the matter of meaningful conversation and local relationship building as the heart and best practice

of tribal consultation, with all local and connected tribes. Proper management of these significant tribal landscapes and resources begins with understanding and conversation, which cannot take place in the form of an email notification sent to already overflowing inboxes in the form of “checking a box.” We are pleased to hear that more personal and proactive methods of communication have been employed in Idaho, as discussed in the workshop, and encourage these methods of true tribal consultation be applied across federal agencies in tandem with the development of formal collaborations, such as the Bi-State Tribal Natural Resources Committee.

Thank you for your time and consideration in the development of the May 8th and 9th workshop as well as the associated pinyon pine management and conservation comment period. We appreciate the opportunity to follow these efforts to conserve mature and old growth forests and offer comments. We look forward to future conservation efforts in pinyon juniper woodlands and best practices that will emerge for the balance of conservation, science, cultural uses, and development in the face of climate change.

Sincerely,



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