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Title:

Comments: Our national forests should no longer be thought of as merely a source of timber, but they need to be honored for the role they play as a carbon sink as well. Currently just 5% of our domestic wood products are sourced from national forests, so setting aside that use should not be insurmountable.

To retain the most carbon and the most biodiversity within these 'climate forests' we make the following suggestions:

1. National forest lands that have never been harvested should be considered 'climate- forests' and remain undisturbed by thinning and harvesting.

2. If a national forest has less than fifty percent of its land in this category (not harvested since acquired), younger forests should be identified that will be allowed to age and bring the total acreage of 'climate-forests' to at least fifty percent.

3. Climate-forests should not be thinned in the name of 'wildfire control.'

Recent research has shown that older, protected, forests are less vulnerable to intense

fires, and the most vulnerable are the younger forestsv. Therefore, if thinning and prescribed burns are considered for the Urban-Wild Interface they should not be done in the 'climate-forests'. Instead, these treatments should be focused on the younger forests, and more should be done to educate and control humans - the number one cause of wildfires. In the event of wildfire climate forests should not be salvage logged. 4. Climate forests should not be salvage logged after a wildfire since large amounts of carbon are held even in fire-killed trees.

5. Climate forests should not be cut or chemically treated to control native insects. Chemical control is acceptable only for non-native invasive insects.

6. Climate forests should not be silviculturally treated, even to advance old-growth structural characteristics since some old-growth characteristics emerge only with sufficient time. For example, it takes time for large coarse woody debris to develop even with silvicultural manipulations, or for logs to reach advanced stages of decay.