

(24) *Comment:* One commenter stated that the proposed rule does not consider the widespread participation in sustainable forest management certification programs such as the Sustainable Forestry Initiative (SFI) and the Forest Stewardship Council that promote forest health and resilience in opposition to climate change with sequestration of carbon in wood products and renewable reforestation and harvest cycles.

Our Response: While sustainable forest management certification programs require actions by participants that are ecologically beneficial, the certification standards are too general to evaluate the effects of participation on fishers. For example, one of the certification programs, Sustainable Forestry Initiative, lists the following indicators that represent a program to protect threatened and endangered species: “1) program to protect threatened and endangered species; 2) program to locate and protect known sites of flora and fauna associated with viable occurrences of critically imperiled and imperiled species and communities also known as Forests with Exceptional Conservation Value; 3) support of and participation in plans or programs for the conservation of old-growth forests in the region of ownership or forest tenure” (SFI 2015, p. 6).

Commented [PA1]: From Bridget: Are we worried about calling this out by name? ie are we risking a relationship with a potential partner in conservation?

Gina