
From: Ericson, Jenny </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=A9AF3CFCDABE4DBDB9336A77AEA307D1-JENNY_ERICS>
To: Russell, Daniel; Picco, Angela
Sent: 3/6/2020 12:18:22 AM
Subject: Final rule

Dan and Angela,

Here are some of my thoughts on the draft. Dan suggested I send them to you by email.

- 1) There are a few places in the Summary of Changes section where it might be beneficial to emphasize recently received public comments (received since publication of the 2019 proposed rule) to support our re-evaluation of our DPS approach. As it's currently written, the focus is on the "numerous comments received during multiple comment periods" but it might be stronger if we can indicate that comments supporting the separation of SSN from NCSO were received in the most recent comment periods as well as in earlier periods.
- 2) Looking over Kerry's 2018 memo, one of the red flags highlighted by the judge continues to be the exposure to toxicants and threat of rodenticides, especially the increases in mortalities from anticoagulants and rodenticide toxicosis. An interesting observation is made toward the end of the NCSO Exposure to Toxicants section that speculates that California has long been the primary source of marijuana in the US. I tend to agree with this being from Northern California, however, since we have no literature citations for this information we should make clear that this is speculation only.
- 3) Overall, the toxicants discussion seems really thorough in the NCSO section but could be stronger in the SSN section. (In general the NCSO sections are more well developed than the SSN sections). However, the lethal and sublethal effects of toxicants combined with small population size in SSN leading to greater potential to reduce population resiliency was clearly articulated.
- 4) The robust discussion of carrying capacity (with diagram) and parameter estimates (in table format) around lambda are a good addition. However, to me the more interesting thing is the larger historical context that fishers in the NCSO DPS have rebounded substantially from their low in the late 1800's and early 1900's.
- 4) When discussing the recovery plan at the end of the rule it might make more sense to add a contact from the Sacramento office rather than the Yreka office, given that SSN is in Sacramento's jurisdiction.

Jenny Ericson
Field Supervisor
Yreka Fish and Wildlife Office (USFWS)
Office: 530-841-3115
Cell: 530-340-6223