

(22) *Comment:* One commenter disagreed with information we presented in the 2019 Revised Proposed Rule regarding the historical and current distribution of fishers in the SSN subpopulation. The commenter suggested that our statement that historically the SSN subpopulation likely extended farther north than our current DPS boundary in the Sierra Nevada was conjecture and that historical museum specimens are limited to south of the Tuolumne River, which is currently the northern boundary of what was identified in the 2019 Revised Proposed Rule as the Sierra Nevada portion of the DPS. Further, the commenter mentioned that our statement that multiple lines of genetic evidence suggests that the NCSO and SSN subpopulations have been isolated since before European settlement contradicts the previous assertion that fishers historically occupied the area between the NCSO and SSN portions of the DPS. The commenter also disagreed with our statement that the current northern boundary of the SSN subpopulation is the Tuolumne River in Yosemite National Park, asserting that the northern extent of the current occupied distribution of the SSN subpopulation is actually the Merced River, varying from about 10 to 20 miles south of the Tuolumne River. They stated that only a single male fisher was recently detected north of the Merced River and that there is no fisher population between the Merced and Tuolumne rivers.

Our Response: Although not confirmed, there are numerous historical sightings of fishers, many of them from reported trapping locations from 1919-1924, in the areas between the SSN and NCSO DPSs (summarized in CDFW 2015, pp. 17-19). Thus, we conclude that at some point, fishers occupied portions of the northern Sierra Nevada at least temporarily. Whether the northern Sierra Nevada contained a viable population or only served as a movement corridor between the current NCSO and SSN DPSs is unknown. That said, genetic information supports that the NCSO and SSN DPSs have been largely separated for thousands of years (Tucker *et al.* 2014, p. 3), [so we determined that separating the NCSO DPS and SSN DPS was appropriate.](#)

Commented [PA1]: From Bridget: Connect the dots on how this information relates to our overall answer, because it does seem like this info does conflict with the data from the early 1900s.

I thought we were maintaining that the map did not necessarily represent "DPS boundaries" but was our best approximation of where fishers, if found, would be SSN fishers. But we are listing the DPS "where found"

Can we back up this assertion with a citation?

Madeline addressing

Commented [DMK2R1]: Gina wants to look over too.

We included the area between the Tuolumne and Merced rivers in the SSN DPS because the area contains suitable habitat, and fishers found in this area would be a part of the SSN DPS. In addition, the recent detection of at least one fisher north of the Merced River indicates that the SSN DPS has the capability to expand into the area between the Tuolumne and Merced river (Stock 2020, pers. comm.).

~~We included the area between the Tuolumne and Merced rivers in the DPS boundaries because that area contains suitable habitat that the SSN DPS may expand into in the near future. In addition, fishers may use the area between the rivers seasonally, especially male fishers searching for mates in the spring.~~