
From: Willy, Elizabeth </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1b5262fd1187434cae771f17280381c7-elizabeth_w>
To: Picco, Angela
Sent: 3/9/2020 5:46:53 PM
Subject: Re: Need your help addressing Bridget's comments on RTC section of fisher final rule...thank you!

Hi Angela,

Here is comment 43 (for whatever reason I cannot attach the document, nor just a version with only this comment)....not much in the way of edits (highlighted yellow below so they stand out), but I added comment bubble responses to Bridget's in case that's helpful (these are goofy links embedded in the text below...sorry!).

(43) Comment: One commenter took issue with the following statement from the 2019 Revised Proposed Rule: "Now, these small populations of Pacific Fisher are threatened by the use of toxic rodenticides by marijuana growers, and increasing fire severity exacerbated by climate change, along with loss of habitat due to logging." The commenters state that increasing fire severity exacerbated by climate change and loss of habitat due to logging are theory only, and that only rodenticide is the real threat. [PA1] [WE2] The commenter asserts that no significant climate change has taken place in the western Cascades since 1650 and that there has been little to no logging taking place that affects the habitat in question. Protection of fisher from the threat of poisoning due to toxic rodenticides can, and should be, done by local ordinance, not by putting our lands at risk from further mismanagement by restricting activity and efforts to reduce current catastrophic fuel loads. The commenter went on to state that the true danger to fisher is, and will continue to be, catastrophic wildfire, and management efforts for that purpose must continue unimpeded.

Our Response: [PA3] [WE4] Our threats analysis considered the best available science and considered them holistically when making our final decision. In addition, we recognize the importance of fuels reduction treatments that promote forest heterogeneity while retaining structural elements important to fishers (for example, see Voluntary Conservation Measures section above).

[PA1] From Bridget: Seems to contradict the last statement about catastrophic wildfire. Are these different commenters saying different things? If so, clarify in this summary.

[WE2] I believe there was a typo. Same commenter from what I can tell. Yes, the commenter is trying to contradict what we said with their own ideas of where the real threats lie.

[PA3] From Bridget: This comment response seems like ipse dixit. Can we support our analysis and conclusions regarding climate change and loss of habitat?

[WE4] I don't think there is anything more to say. The Commenter clearly has his/her own opinion on the threats and from I can tell they do not provide info to back them up. Added the voluntary conservation measures reference as example of where we indicate fuels (perhaps indirectly) that fuels reduction treatments can be beneficial to fisher.

Elizabeth

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**From:** Picco, Angela <Angela\_Picco@fws.gov>

**Sent:** Monday, March 9, 2020 11:56 AM

**To:** Russell, Daniel <daniel\_russell@fws.gov>; Hull, Josh <Josh\_Hull@fws.gov>; Eyes, Stephanie A <stephanie\_eyes@fws.gov>; Glenne, Gina <gina\_glenne@fws.gov>; Livingston, Sue <sue\_livingston@fws.gov>; Crowell, Heidi <heidi\_crowell@fws.gov>; Willy, Elizabeth <elizabeth\_willy@fws.gov>; Drake, Madeline K <madeline\_drake@fws.gov>

**Subject:** Need your help addressing Bridget's comments on RTC section of fisher final rule...thank you!

Hello team,

Attached is the word version of the Responses to Comments section that has the outstanding comments from Bridget that I need your help with. Please address these comments for your sections using track changes in Word and email back to me to incorporate.

Thanks!

Angela

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Angela Picco, Ph.D.

Deputy Chief of Ecological Services and Regional Recovery Coordinator

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