
From: Carey, Robert L </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=236B9AA3645F40058B9F3681B29CEBDD-ROBERT_CARE>
To: Livingston, Sue; Glenne, Gina
Sent: 3/9/2020 7:29:19 PM
Subject: Re: question 33

This looks great. Thanks.

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From: Livingston, Sue <sue_livingston@fws.gov>
Sent: Monday, March 9, 2020 2:47 PM
To: Glenne, Gina <gina_glenne@fws.gov>
Cc: Carey, Robert L <robert_carey@fws.gov>
Subject: RE: question 33

I'll defer to Bob, but otherwise I'm good.

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From: Glenne, Gina <gina_glenne@fws.gov>
Sent: Monday, March 9, 2020 2:26 PM
To: Livingston, Sue <sue_livingston@fws.gov>
Cc: Carey, Robert L <robert_carey@fws.gov>
Subject: RE: question 33

K. Sue. Just a couple of smaller tweaks. I took SFI's name out of the specific example. I also added a sentence that starts "we believe..." Otherwise, wording choices. Bob, I'm interested in your take of this.

(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 for fisher conservation. As an example, one of the certification programs, lists the following standards: 1) a program to protect threatened and endangered species; 2) a 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; and 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). We believe these sustainable forest management certification programs can and do promote and lead to fisher conservation. We are not implying that these standards are faulty. However, as written these general standards are too vague to consider their benefit to fishers and how they may reduce existing threats. The Service requires specific information from the participants of the sustainable forest management certification program and how they meet these standards in order to be able to assess the degree to which they affect fisher conservation and address the threats the species faces.

From Bridget: Are we worried about calling this out by name? Is are we risking a relationship with a potential partner in conservation?

Sue with Gina

Gina Glenne

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From: Livingston, Sue <sue_livingston@fws.gov>
Sent: Monday, March 09, 2020 1:20 PM
To: Glenne, Gina <gina_glenne@fws.gov>
Subject: question 33

Hi Gina,

Below in yellow highlight is what I added to the response to question 33 (I think that was the number, RE SFI). I was hesitant to just remove the reference to SFI and still provide example language because then somebody would want a citation. Thanks for tackling.

Our Response: While sustainable forest management certification programs may 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 Forest 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). We do not mean to imply that these measures are faulty or that they do not promote fisher conservation. However, as written these standards are too vague to consider their benefit to fishers and how they may reduce existing threats. The Service requires information specific as to what will be done by each SFI participant to meet these indicators in order to be able to assess the degree to which their program affects fishers and addresses the threats.

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