



March 21, 2019

[Via email to GreenDiamondCCAComments@fws.gov](mailto:GreenDiamondCCAComments@fws.gov)

State Supervisor
Oregon Fish and Wildlife Office
2600 SE 98th Avenue, Suite 100
Portland, OR 97266

**Re: Proposed Green Diamond Resource Company Candidate Conservation Agreement With Assurances for Fisher in Oregon
Docket No. FWS-R1-ES-2018-N147, 84 Fed. Reg. 4851 (Feb. 19, 2019)**

To Whom It May Concern:

The American Forest Resource Council (AFRC) submits the following comments supporting the Green Diamond Resource Co. Candidate Conservation Agreement With Assurances (CCAA) for Fisher in Oregon. AFRC has commended on proposals to list the West Coast distinct population segment (DPS) of fisher (*Pekania pennanti*) as a threatened species under the Endangered Species Act (ESA). Those comments are incorporated by reference.

The fisher presents an outstanding opportunity for collaborative conservation efforts between the government, private industry, and nongovernmental organizations to bear fruit. The Oregon template CCAA, of which the Green Diamond CCAA is an exemplar, is one of the key efforts that will ensure fisher conservation for the foreseeable future. In part because of such efforts, there is no need to add the fisher to the list of endangered or threatened wildlife.

AFRC is a regional trade association whose purpose is to advocate for sustained yield timber harvests on public timberlands throughout the West to enhance forest health and resistance to fire, insects, and disease. We do this by promoting active management to attain productive public forests, protect adjoining private forests, and assure community stability. We work to improve federal and state laws, regulations, policies and decisions regarding access to and management of public forest lands and protection of all forest lands. Because AFRC is interested in making species conservation efforts align with timber supply needs, we offer the following comments.

Since 2016, when FWS last issued a listing determination on the fisher, massive cooperative conservation efforts have been undertaken for benefit of the fisher, of which this CCAA is one example. All told, these CCAAs ensure that several million acres will be covered by take avoidance measures and will be available for research and potential reintroduction.

Reintroduction efforts in Washington have brought together disparate stakeholders including environmental groups. If the fisher were to be listed, these efforts would be devalued, and the future of reintroduction becomes doubtful.

New data also indicates increasing robustness of existing fisher populations and increasing indications that active forest management and fisher conservation are complementary and even synergistic efforts. For example, fisher have been observed denning in timber harvest slash piles, and fishers have been observed seeking out areas with edges related to timber management, possibly due to prey availability. M.A. Parsons, *Effects of forest management, prey, and predators on the habitat selection of fishers in the South Cascades of Washington* (2018).

Recent data shows greater confidence that population growth rates in California are at or above 1.0. K.C. Purcell et al., *Sugar Pine fisher project final report: a continuation of the Sierra Nevada Adaptive Management Project (SNAMP)* (2018). Data also indicates our understanding of historic fisher population decline is incomplete. Widespread predator control efforts in the late 19th and early 20th centuries were undertaken using toxicants, but the effect on smaller mammals such as fisher has not been studied. See generally Robert W. Denton, *The Predator Control Controversy in Montana and the West*, M.S. thesis, Univ. of Mont., 1974. As such, the degree to which active forest management may be a stressor to fishers may be less than some have assumed.

This CCAA presents an excellent example of how active forest management and fisher are compatible. It parallels measures used in Washington's programmatic CCAA which has been a great success, enrolling over 50 landowners and 3 million acres. The conservation measures in the CCAA focus on protecting denning fishers and young, thus addressing demographic challenges that could result from small population size. Because fisher appear thrive in managed habitat, habitat in general should not be viewed as limiting; as noted above, it is unclear whether previous population declines were caused by habitat modification. Early dividends of development of this CCAA include the discovery that denning fisher use logging slash piles, suggesting that essential habitat features for denning and demographic support can be created on the landscape at every seral stage.

We encourage the Service to approve the CCAA and to give the resulting conservation measures its full consideration in deciding whether to list the fisher.

Thank you for the opportunity to provide these comments.

Sincerely,

/s/ Lawson E. Fite

Lawson E. Fite

General Counsel