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To: FisherSPICCAAComments@fws.gov
cc:
Subject: Comments on proposed fisher reintroduction to northern Sierra Nevada

Philip Detrich, Field Supervisor
U.S. Fish and Wildlife Service
Yreka Fish and Wildlife Office
1829 South Oregon Street
Yreka, CA 96097

Dear Mr. Detrich,

On behalf of the John Muir Project I am submitting the following comments on the proposal to remove Pacific fishers from the NW California population and reintroduce them into a large area of heavily-logged industrial timberlands owned by Sierra Pacific Industries (SPI). I have a Ph.D. in Ecology from UC Davis with a research focus on forest and fire ecology in Sierra Nevada forests. I am also currently preparing a research project on the relationship between fishers and fire-mediated habitat. I offer the following brief comments in the hope of facilitating management based upon sound science and ecology:

1) Ample sound scientific data and analysis must be provided to establish that removing numerous individual fishers from the NW CA population will not pose any real risk of extinction of that population. Such data has not been presented to date.

2) Even if such data is provided, we strongly oppose reintroducing these fishers into this large (approx. 160,000-acre?) area of SPI industrial timberlands. By any reasonable assessment of fisher habitat associations for denning and resting (dense, mature and old growth forest with an abundance of very large trees and snags, and large downed logs) and any honest assessment of the low habitat value of the SPI lands (due to heavy logging, removal of large trees, canopy reduction, etc.), placing fishers onto these SPI lands is prescription for disaster, and is tantamount to a decision to knowingly kill numerous fishers. No reasonable or remotely credible explanation has been, or can be, offered to explain why fishers would be deliberately placed in the one area that is, by all that we know, least likely to result in their survival. Nor has any sound or credible scientific data been offered to establish that survival is likely for fishers reintroduced onto these SPI lands. This is further exacerbated by the fact that, with regard to any small patches of marginal fisher habitat that *might* exist on these SPI lands, SPI would continue to log such habitat even as fishers are reintroduced. This is, quite honestly, one of the strangest and most alarming wildlife reintroduction proposals that I have even witnessed.

3) If ample sound scientific data and analysis is presented showing that removing the suggested number of fishers from the NW CA population will not pose any real risk of extinction of that population, then we would strongly support reintroduction of fishers into the central and northern Sierra Nevada, but it must be done on federal public lands, and should, in fact, occur on the largest and most contiguous tracts of federal lands with the largest concentrations of mature/old-growth closed-canopy forest and unroaded areas. Anything less could be interpreted as an effort to cause the extinction of the Pacific fisher before ESA listing and population recovery can even occur. Further, such fisher reintroduction must be accompanied by reintroduction of porcupines, and reestablishment of healthy porcupine and Sierra Nevada snowshoe hare populations, to serve as fisher prey.

Please keep me notified, via U.S. mail, of any and all developments

regarding fisher reintroduction into the northern Sierra.

Sincerely,

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