



Central Coast Forest Association

Protecting our land and our rights

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ATTN: Recovery Coordinator/CCC Coho Salmon Recovery Plan Comments
National Marine Fisheries Service
777 Sonoma Avenue, Suite 325
Santa Rosa, CA 95404

Subject: CCC Coho Salmon Recovery Plan

To Whom It May Concern:

The Central Coast Forest Association (CCFA) is a coalition of small forestland owners and forestry professionals working together in the interest of healthy, productive forests in the Santa Cruz Mountains. Big Creek Lumber Co. is a family owned and operated sustainable, selective harvesting timber company that demonstrates some of the best cared for land on our coast. Big Creek has received awards from the California Department of Forestry for excellent stewardship and awards from the California Department of Fish and Game for outstanding wildlife conservation. Currently, Big Creek provides land for the Monterey Bay Salmon and Trout Project, Native Anadromous Fish Genetic Conservation Hatchery. Together, CCFA and Big Creek Lumber Co. represent a majority of the Santa Cruz Mountains forestland interests.

We ask NOAA to consider what is regarded in NMFS F/NWC-194 as the "key question" in defining Evolutionary Significant Units (ESUs) of Pacific salmon: "How can evolutionarily important units be protected without running the risk of artificially maintaining units that might naturally undergo episodes of extinction/recolonization on something short of evolutionary time scales?" The answer, of course, is to exclude such ephemeral, "sink" populations from the ESU. NOAA has nevertheless proceeded to include ephemeral, hatchery dependent populations south of San Francisco as part of the Central California Coast coho salmon (*Oncorhynchus kisutch*) ESU (CCC ESU).

We ask that this cover letter and all appended documents on enclosed CD be included in the record for recovery planning. The enclosed documentation extensively details the facts concerning coho salmon south of San Francisco. These facts conclusively show that coho salmon south of San Francisco should never have been listed under the Endangered Species Act.