



Central Coast Forest Association

Protecting our land and our rights

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April 3, 2006

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.

Furthermore, the facts make clear that despite NOAA's insistence on including coho south of San Francisco as part of the CCC ESU, these ephemeral populations must be excluded from the forthcoming NOAA recovery plan.

Over the last two years CCFA and Big Creek Lumber Co. have repeatedly urged NOAA and the California Fish and Game Commission to exclude coho south of San Francisco from their respective Endangered Species Acts. The reasoning for this is simple: *Restoration of a coho population that has no history of persistent colonization and could not survive without frequent hatchery supplementation is senseless.* Unless the recovery plan is going to change the climate, geology, and ocean conditions south of San Francisco, it is never going to establish a self-sustaining population of coho here. There is a reason the coho range, which covers thousands of miles of coastline, ends in central California. Every fish biologist outside of the government that is familiar with the area concurs that the limiting factor for coho south of San Francisco is not a problem of habitat degradation.

Nor are there any data upon which to base recovery goals. The only historical data that concern coho south of San Francisco prior to hatchery plantings strongly suggest a complete absence or a possible ephemeral presence at best. NOAA's clever bureaucrats have repeatedly based historical "natural" abundance estimates on fish census data from the 1940s, which were clearly a result of ambitious hatchery planting. Similarly, NOAA's evidence of historical declines was fabricated by comparing these same hatchery-augmented data to sparse measurements of recent abundance during times of rigorously curtailed or absent hatchery support.

Most importantly, the experiment upon which NOAA is about to embark has already been attempted. Although not cited in either federal or state listing petitions or status reviews, a variety of sources such as government documents, private and scientific correspondence, popular literature and newspaper articles contained herein informs us that coho from Baker Lake Washington were introduced into Santa Cruz mountains streams by fisheries biologists in 1906 with the intention of establishing a new species for the benefit of anglers. Repeated hatchery transplants from various locations have followed only to succumb to the next stochastic event. The best example we have of this occurred in the mid 1970s. Between 1942 and the early 1970s, very little hatchery supplementation of coho was done south of San Francisco. By NOAA's own admission, populations slowly declined during this time. As it happens, favorable ocean

conditions and a lull in repeated stochastic events averted any major extirpations until the mid 1970s when a single extended drought almost completely eliminated all coho south of San Francisco (only two streams retained a single year-class). Since then, ambitious hatchery supplementation has barely kept pace with naturally occurring periods of poor ocean conditions as well as a host of naturally occurring floods and droughts that are devastating to coho populations.

Prior to 1900, noted Stanford ichthyologist, David Starr Jordan, and other scientists who conducted on-the-ground fish census surveys, identified San Francisco as the southern extent of the coho spawning range. Consistent with this, archeological studies have found no coho remains in the pre-European native's cooking refuse south of San Francisco, but find remains to the north.

Genetic studies of West Coast coho have been conducted but little of value has been published. The presently employed microsatellite analysis by NOAA scientists cannot speak to or resolve the question of their native origin or historical abundance. NOAA maintains that, of the 5,500 California fish sampled, coho south of San Francisco are most closely related to the fish north of San Francisco. Yet, this is not surprising, nor does it indicate a native origin. Since the initial 1906-1910 introductions, the majority of imported fish over the last century were of neighboring California stocks which, combined with straying from just north of San Francisco, will undoubtedly result in genetic affinities. Similarly, while NOAA seems to place a great deal of significance on the observed concordance between genetic and geographic population structure, this only applies to the CCC ESU *north of San Francisco*. The latest genetic data for the stocks south of San Francisco do not support concordance between genetic and geographic population structure.

No single observation or fact is conclusive regarding the southern extent of the coho range. Yet, the cumulative weight of the available information suggests that wild spawning coho salmon historically did not maintain long-term colonies in these waters. None of the information precludes the probability of occasional, ephemeral colonies begun by stray adults that could flourish until the first major flood or drought. In fact, there is some inconclusive evidence stray coho salmon from north of San Francisco may have entered coastal streams south of San Francisco in the past. Temporary stray colonies beyond the species range boundaries are a documented occurrence among Pacific salmon but these should not be regarded as "recoverable"

populations. For instance, although pink salmon (*O. gorbuscha*) adults are found during some spawner surveys in Oregon coastal streams, no permanent populations of pink salmon have been found there. Accordingly, the Oregon Department of Fish and Wildlife does not treat these as native fish and finds they cannot legitimately be listed as endangered. Likewise, stray pink and chum salmon (*O. keta*) have been observed south of San Francisco, in the San Lorenzo River, since the early 1900s. However, no reasonable person would suggest that we try to “recover” these temporary populations. The only difference is that pink and chum salmon were not considered economically desirable enough to artificially propagate south of San Francisco (unlike coho). Thus, 100 years of hatchery efforts have created the illusory expectation that these coho are capable of sustainable, naturally-reproducing populations. Despite the willingness of some government agencies to exploit this misconception, the preponderance of evidence indicates that coho salmon populations cannot and have never persisted for an extended time in the streams south of San Francisco in the absence of hatchery support.

Due to the obviously flawed logic behind trying to restore the un-restorable, on November 30, 2005, Russ Strach, Assistant Regional Administrator for Protected Resources, disingenuously stated that although the fish would remain listed they would not necessarily be included in the recovery plan. We believe NOAA Fisheries intends to do just that. In fact, we expect NOAA’s justification for pursuing “recovery” efforts south of San Francisco will be largely based on the fact that they were already included in the CCC ESU. We urge NOAA to avert artificially encouraging nonnative coho to the detriment of other competing species such as the native steelhead trout. History will undoubtedly condemn such a reckless act, particularly when it is quite clear the experiment will ultimately fail at a colossal cost to other living things including steelhead trout, responsible landowners, and the taxpaying public.

Sincerely,



Fabian Alvarado
Vice President

Documents Contained on Enclosed CD:

Name	Size	Type
Files Currently on the CD		
faxfromstreig29nov05[1]	271 KB	Adobe Acrobat 7.0 Document
ccfavcfgc4november2005[1]	188 KB	Adobe Acrobat 7.0 Document
2005cdfgreviewandresponse[1]	3,478 KB	Adobe Acrobat 7.0 Document
2004cdfgpetition[1]	2,139 KB	Adobe Acrobat 7.0 Document
Final Critical Review	97 KB	Microsoft Word Document
2005kaczynski[1]	40 KB	Adobe Acrobat 7.0 Document
dec18memofollowupletter[1]	135 KB	Adobe Acrobat 7.0 Document
december18memo[1]	988 KB	Adobe Acrobat 7.0 Document
27-LetterToStrach5Dec05	385 KB	Adobe Acrobat 7.0 Document
21-LetterToWingert11Oct05	127 KB	Adobe Acrobat 7.0 Document
16-FOIALetterToWingert28July05	107 KB	Adobe Acrobat 7.0 Document
15-FollowupLetterToGarza20July05	59 KB	Adobe Acrobat 7.0 Document
december18memoaddendum	83 KB	Adobe Acrobat 7.0 Document
22-FOIAFollowupLetter14Oct05	44 KB	Microsoft Word Document
20-FOIAFollowupLetter6Oct05	42 KB	Microsoft Word Document
26-FaxFromStreig29Nov05	271 KB	Adobe Acrobat 7.0 Document
24-LetterToGarza24Oct05	91 KB	Adobe Acrobat 7.0 Document
17-FOIAResponseA8Sept05	433 KB	Adobe Acrobat 7.0 Document
18-FOIAResponseB8Sept05	489 KB	Adobe Acrobat 7.0 Document
19-FOIAInquiryLetterFromBuchal30Sept05	42 KB	Microsoft Word Document
14-ReplyToNOAASecondReview10May05	92 KB	Adobe Acrobat 7.0 Document
13-SecondReviewFromNOAA17Apr05	476 KB	Adobe Acrobat 7.0 Document
11-LetterToNOAA2Dec04	43 KB	Adobe Acrobat 7.0 Document
12-LetterToNOAA SCL18jan05	44 KB	Adobe Acrobat 7.0 Document
10-LetterToNOAA2Dec04	76 KB	Adobe Acrobat 7.0 Document
09-LetterToNOAA12Nov04	49 KB	Adobe Acrobat 7.0 Document
08-ResponseToNOAAReviewAdd25Oct04	162 KB	Adobe Acrobat 7.0 Document
07-ResponseToNOAAReview18Oct04	3,633 KB	Adobe Acrobat 7.0 Document
06-ReviewFromNOAA17Sept04	1,175 KB	Adobe Acrobat 7.0 Document
05-LetterToNOAA14Sept04	47 KB	Adobe Acrobat 7.0 Document
04-LetterFromNOAA13Sept04	107 KB	Adobe Acrobat 7.0 Document
03-LetterToNOAA8July04	69 KB	Adobe Acrobat 7.0 Document
02-NOAAPetitionAdd6Feb04	166 KB	Adobe Acrobat 7.0 Document
01-NOAAPetition6Nov03	1,641 KB	Adobe Acrobat 7.0 Document

34 objects