



"Growing Redwoods for the Future"

BIG CREEK LUMBER CO. 3564 Highway 1, Davenport, CA 95017 (831) 457-5015

To: Mr. Michael Flores, President
Mr. Sam Schuchat, Commissioner
Mr. Jim Kellogg, Commissioner
Mr. Bob Hattoy, Commissioner

California Fish and Game Commission
1416 Ninth Street, 13th Floor
Sacramento, California 95814

Re: CDF&G document, Response to Comments on the Draft Recovery Strategy for California Coho Salmon (*Oncorhynchus kisutch*), January 2004

Date: January 30, 2004

Dear President and Commissioners,

The first paragraph on page 1 of the CDFG document Response to Comments on the Draft Recovery Strategy for California Coho Salmon, January 2004 makes the statement:

"Comments received that did not pertain to the Recovery Strategy, such as whether or not the species warranted listing throughout a portion or all of its range in California, were not included."

I am amazed at this cursory dismissal of the information I provided to the Commission that specifically addresses the substance of the "Recovery Strategy".

My Dec. 18, 2003 communication, "Memorandum Concerning Recovery Strategy for California Coho Salmon (CDFG, 2003) with regard to Coastal Streams South of San Francisco" presents the results of many years of research and investigation demonstrating with historic and scientific facts that, prior to large scale transplantation from other locations, coho were scarce or absent in streams south of San Francisco. I can think of nothing that pertains more directly to the Recovery Strategy for Coho Salmon in the streams south of San Francisco than this. It is central to any rational thinking on the subject of recovery.

The following statement in the subject document:

"The Commission found that coho salmon warranted listing south of San Francisco in December, 1995..."

is pointless. Our study discloses that this listing was based on invalid data and misinformation that must be corrected before any productive thought can be given to recovery. Please review my Memo and judge for yourselves whether the listing was based on the best science available at that time.

How can the State plan the recovery of a species that probably never colonized and is not capable of naturally maintaining permanent populations in a particular location? What are the criteria for "recovery" of such a species? How will you know when you have succeeded? What is the purpose of a strategy that totally ignores past and current science? I believe the California State Fish and Game Commission would be extremely interested in these facts.

There is no reasonable way to plan recovery of coho salmon in this location without a full review and understanding of the issues brought to light by my Memo. CDFG's dismissal of the Memo does not serve your Commission nor the citizens, fishermen and taxpayers of California.

Sincerely,

Homer T. McCrary, Vice President

cc: Robert Treanor, Executive Director, California Fish and Game Commission
Loris "Ryan" Brodderick, Director, California Department of Fish and Game
Michael Chrisman, California Resources Agency