

Homer T. McCrary

310 Swanton Road, Davenport, CA 95017

Phone (831) 423-4366

October 25, 2004

Mr. Rodney McInnis
Regional Administrator
NOAA Fisheries, Southwest Region
501 W. Ocean Blvd., Suite 4200
Long Beach, CA 90802-4213

Subject: Addendum to Response to NOAA Fisheries, Santa Cruz Laboratory, review of November 6, 2003 petition concerning coho salmon south of San Francisco

Dear Mr. McInnis,

Since our last correspondence we have discovered new data that supports our assertion that no valid evidence exists of any coho salmon in this area prior to their (well documented) artificial introduction as a new, sport-fishing resource in 1906.

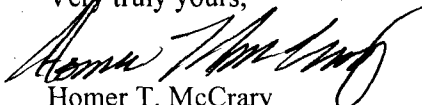
The NOAA Fisheries Southwest Region Santa Cruz Laboratory (NOAA 2004) presented a number of unsound arguments in their technical response to our petition (McCrary 2003). One of these arguments concerned coho specimens that were purportedly collected in 1895 at some Santa Cruz streams. In our response to the Santa Cruz Lab review (McCrary 2004) we pointed out that between the chaotic accession log, the initial species misidentifications, the missing specimens, and the unattributed second identity labels, the chain of custody has been broken and the specimens are not reliable. In addition, we would now like to bring to your attention an excerpt from an early Stanford Ichthyological Bulletin (Bohlke 1953):

"The early morning of April 18, 1906, saw much damage to the Stanford buildings as a result of the San Francisco earthquake (the San Andreas fault is only four miles west of the campus). The fish collections took their share of the damage. More than 1,000 jars and bottles were broken although the majority survived intact. The wreckage lay on the floor, kept wet with water from hoses manned day and night by Professors Snyder and Starks, until new bottles and alcohol could be secured. An effort was made to match specimens and data, this work being done by each member of the entire ichthyological group who had most actively been working on the specimens concerned. As a result much was saved that might have been lost, although there were numerous instances in which the material had to be discarded. In others, some doubt could not be avoided. A small printed label stating 'Bottle broken during earthquake' was inserted in each bottle. Unfortunately, according to Prof. J. O. Snyder, a careless curatorial assistant later removed these labels from about half of the jars bearing them" (Bohlke 1953).

Of course, even if these specimens were valid, they are not by themselves evidence of a native population of coho south of San Francisco. Nevertheless, this information (Bohlke 1953) greatly increases the uncertainty of their authenticity. To reiterate, definite conclusions drawn solely from these specimens could not stand scientific or legal scrutiny.

Thank you for this added opportunity to augment the corresponding administrative record that is on file at your office.

Very truly yours,



Homer T. McCrary
Santa Cruz Mountains Forestland Owner

cc: Donald L. Evans, Secretary, U.S. Dept. of Commerce
Jack Dunnigan, Director, Sustainable Fisheries, NMFS, NOAA
William T. Hogarth, Assistant Administrator, NMFS, NOAA
Craig Wingert, Fishery Management Specialist, Southwest Region, NMFS, NOAA
William Fox, Director, Southwest Fisheries Science Center, NMFS, NOAA
Churchill Grimes, Director, Southwest Fisheries Science Center, Santa Cruz Laboratory, NMFS, NOAA
Pete Adams, Chief, Fisheries Branch, Southwest Fisheries Science Center, Santa Cruz Laboratory, NMFS, NOAA
Rob Rivett, Pacific Legal Foundation
Mark Rentz, California Forestry Association
Pam Giacomini, California Farm Bureau Federation

References:

Bohlke, J. 1953. "A Catalogue of the Type Specimens of Recent Fishes in the Natural History Museum of Stanford University." Stanford Ichthyological Buletin. 31 July 1953. Vol. 5. Natural History Museum of Stanford University: Stanford, California.

McCrary, H. T. 2003. Petition to Redefine the Southern Extent of the Central California Coho ESU. Davenport, CA: Submitted to the NOAA Fisheries. 6 November 2004.

-. 2004. Response to the NOAA Fisheries, Santa Cruz Laboratory Review of the November 6, 2003 Petition from Homer T. McCrary Concerning Coho Salmon South of San Francisco. Davenport, CA: Submitted to the NOAA Fisheries. 19 October 2004.

NOAA. 2004. Untitled, undated, unsigned technical review of the Petition to Redefine the Southern Extent of the Central California Coho ESU submitted to NOAA 6 November 2003 by Homer T. McCrary. Santa Cruz Laboratory: National Oceanic and Atmospheric Administration. 12pp.