USFWS Comments are in blue

We support the tribal lamprey translocation program as an additional pathway for adult migration to upstream tributaries, but not as the only pathway

Response:

Translocation is the only means to keep lamprey alive and present and moving towards recovery in the Upper Basins (Snake and Upper Columbia). Dam to dam efficiency and reservoirs preclude lamprey from showing up in these Upper Basin even in recent high-count years.

For example, the 10-year average over Lower Granite Dam (Snake River) is 93 fish. The 20-year average is 81 fish.

The 10-year average of adult counts at Wells Dam (Upper Columbia) is 51 fish. The 20-year average is 171 fish.

Translocation is essentially the “lifeline” to sustain the number of adult lamprey in these Upper Basins and is the “only” method to get adult lamprey up there (absent of drastic and immediate improvement in passage).

The LPSs that the Corps has built at Bon Dam are a critical part of improving adult lamprey migration through the lower Columbia River

Response:

We agree, and the tribes have been a critical part of the development and implementation of these LPSs. However, the overall passage rates are still approximately 50% in comparison to Salmonids that are passing at 90% +.

Response to 3rd point:

We would prefer that the allocation numbers for the translocation program be adjusted to reflect the current years run size, and that this should be done as soon as data are available to make such an adjustment.

Response:

The translocation guidelines have been determined and agreed upon through years of discussion and feedback from all co-managers.

We can certainly bring this recommendation to our CRITFC Commissioners and determine if a change is warranted through that workgroup.

However, it is important to point out that lamprey counts are not as simple as salmon counts. There are day time counts, night time counts, complexities in lamprey movement with those moving upstream as well as downstream, and various LPS counts that are being calibrated and adjusted throughout the season. We typically do not see a final count until November each calendar year. There was a year when the number of lamprey migrating downstream was actually higher than those going upstream during a good part of the run and as a result, ACOE had to estimate the Bonneville Dam count based on its relationship to The Dalles Dam number (an analysis that was done after the season). With all these contingencies, the in-season count is simply not reliable enough to use for annual allocation numbers.

We will support the proposal as written for this year, but do not want to see this become a long term solution, and would not support this continuing into the following year.

Response:

We too do not look to this as the long-term solution, but we suggest there is a need to retain the option of utilizing this if necessary, in any year. We see this as an interim solution until lamprey passage efficiencies approaches those of salmonids, i.e., 90% or + at each dam (long term solution). Trapping operations have thus far been insufficient to achieve our translocation allocation goals, and translocation is currently the primary method available to bring fish to the Upper Basins and prevent extinction. In addition, the fate for the remaining adults that pass Bonneville Dam is mostly unknown (the vast majority never make it to The Dalles Dam and the majority are not detected in the tributaries in between, either). There is an unacceptably large number of lamprey lost in between these two reaches and we need to understand the big picture that passing Bonneville Dam is not the end of their journey moving upstream as an adult. If their fate is uncertain, what good does it do to only get them upstream of Bonneville Dam?

We are trapping in designated locations, but unable to reach allocation even when we maximize the use of all of our existing locations (we are already doing this). In order to meet our allocations, we need to explore all alternatives available. We are proposing to trap in the LPSs because this increases efficiency, and none of this can be attainable in the other isolated locations.

We are fighting off extirpation in many of these Upper Basins. Translocation is about avoiding this serious risk of extinction in these Upper Basins, and this certainly begins downriver at Bonneville Dam.

We suggest that all interested parties work with the Corps to explore new, long term, alternative trapping locations that are isolated from the primary adult lamprey migration route.

Response:

Yes, we are already doing this, however, what it typically comes down to is that there is no funding to advance any of these options (even the ones that seem promising). What we are requesting here is a simple low hanging fruit option, one that would require little to no additional investment or resources from the ACOE. We are not interested in isolated locations where the number that can be trapped is insignificant. See the previous narrative above.

Of note, over the previous 10 years; lamprey passage at Bonneville improved by only 5% (from 44 % to 49 %). Millions and millions of dollars have been spent over the years, and this is the level of improvement we are seeing. Now, what the tribes are doing through translocation is much more efficient – we are providing a lifeline for these lamprey to seed themselves in the Upper Basins where risk of extinction is highly likely if we only depended on volitional passage alone. We applaud all the improvements that have occurred over the years, but that alone is not bringing lamprey back to the Upper Basins (as displayed in the annual numbers) and in dire situations, more aggressive approaches must be taken to reverse the course and the status-quo.

Please see below;

 **Final collection for BON by Tribe (2019):**

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Year** | **BON Allocation** | **Nez Perce Tribe # Collected** | **Yakama Nation # Collected** | **Umatilla Tribe # Collected** | **Total # Collected for TL^** | **BON Adult Estimate (ACOE Corrected #)\*** | **% of BON Count Translocated** | **Warm Springs Tribe # Collected** |
| **2016** | **215** | **215 (100%)** | **215 (100%)** | **215 (100%)** | **645** | **121,812** | **0.5** | **425** |
| **2017** | **624** | **311 (50%)** | **331 (53%)** | **550 (88%)** | **1192** | **292,441** | **0.4** | **134** |
| **2018** | **2060** | **603 (29%)** | **740 (36%)** | **657 (32%)** | **2000** | **131,268** | **1.5** | **280** |
| **2019** | **2118** | **324 (15%)** | **692 (33%)** | **478 (23%)** | **1494** | **71,000** | **2.1** | **0** |

Of Note: From 2000 to 2008 CTUIR collected in the Bonneville Dam using the researcher traps and the CI Trap. They used the pot traps only starting in 2008.