**NOAA Comments**

**(Comments are similar to the USFWS and CORPS thus responses are the same)**

1. Using the past two years passage info for the transport allocation number can lead to large variations in the percentage of a given years lamprey run that is allocated for transport. Given this is a low year, following two high passage years, they seem to be allocating a relatively higher percentage of this lamprey return for transport than typical. This is putting additional stress to find a higher percentage, i.e. more than the current traps can provide, and causing folks to look to the LPS for numbers. I see the need for a more stable allocation determination method. Based on passage to date, how does this years transport allocation percentage compare to past years, and can a current year run adjustment be made that allocates a more consistent percentage of a given years return?

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 (one reason being many lamprey moving through the picketed lead going upstream and not being counted, while more were being counted moving downstream) 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.

CRITFC intends to develop a method for preseason and in season abundance estimates over the next several years, beginning in 2020. Due to the complexity of Lamprey counts at BON and difficulty to get accurate counts in season, a ‘more stable allocation determination’ has not been available.

2. I really appreciated Bob's point in the FPOM meeting. By selecting LPS lamprey they are targeting fish that are likely to pass the dam successfully. Over half the fish entering the dam typically do not pass, so those fish are a better target for a successful transport and passage program. Could other methods be designed and used to capture more of these fish that are less likely to pass the dam?

Response:

On average, only approx. half the fish that *pass* any given dam successfully pass the next upriver dam the fate of these fish is unknown. A fish that is entering the LPS and successfully passing to the forebay may be a fish that is destined for the Upper Basins, and thus would be exactly the fish that should be collected for translocation. Until lamprey passage is similar to that for Salmon, we will continue translocation and continue seeking access to locations that will increase our success in meeting our allocations. We are looking at other methods/options and locations to collect fish. 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.