

**OFFICIAL COORDINATION REQUEST FOR  
NON-ROUTINE OPERATIONS AND MAINTENANCE**

**COORDINATION TITLE- 19BON31 CRITFC Lamprey Trap Location Additions**

**COORDINATION DATE- July 7, 2019**

**PROJECT- Bonneville Dam**

**RESPONSE DATE- July FPOM meeting or 24 July 2019**

**Description of the problem:** Pacific lamprey adult day counts at Bonneville Dam as of 7/07/19 are 7557 (Note: the uncorrected estimated BON escapement (24 hour) as of 7/1/2019 is n=29828 (Zorich)). If this trend continues, returns this year will be lower than the previous two years; and close to (or less than) the 10-year average. The CRITFC tribes (2019) allocation for translocation at Bonneville is 2118 fish per tribe. CRITFC and its member tribes collect lamprey at designated trapping locations which are identified in the access letter and annual collection plans. Trapping success at the currently designated locations has been low this season. (See Appendix A). The previous 2 years allocation and collections are provided (See Appendix B). CRITFC and its member tribes are seeking an opportunity to collect lamprey at alternative locations. Two locations that are currently being considered include the CI LPS Rest Box (formerly a trap) (Appendix C); and the WA AWS UMTJ Rest Box (Rest box 2) (Appendix D). Other locations have been identified (tailrace) but are not included in this MOC as there will be no impacts of collecting in the tailrace location.

**Purpose:**

This is considered a pilot study to determine if collecting lamprey from LPSs would provide additional fish to supplement other trapping locations and help the tribes to meet the annual allocation goals, while avoiding impact to use of the LPSs by lamprey (avoidance or delay in entering the LPS) or impacts to salmonids (none expected).

**Methods:**

- All staff will wear latex gloves underneath cotton gloves prior to handling equipment and fish to avoid contaminants/scent in the water.
- All nets, gloves, etc. will be designated specifically for the LPSs and not used elsewhere on project to avoid contaminants/scent in the water.
- Lamprey technicians will set large (holding 50-100 fish or greater) removable fish nets inside the rest boxes/traps.
- Nets will be weighted at the bottom to hold the shape and provide adequate space.
- Nets will be secured in the rest boxes/traps such that the lamprey enter directly into the nets from the ramps without escaping (clamps/zip ties).
- Restbox/trap will be checked on an agreed upon schedule tbd (based on the run size and expected numbers of fish using the LPS) to ensure no harm to the fish, no

delays, and no overcrowding (this may mean hourly, every few hours, or set in the evening and checked in the morning).

- CRITFC and the member tribes will have sufficient staff to have 2 staff work overnight shifts if necessary to set and pull nets in LPSs.
- If night hours are required, CRITFC and member tribes will work with the Corps to ensure badge access at night time.
- Mortalities will be reported as per protocol.
- Fish are transferred from nets to buckets filled with water, then placed into the tanks in the back of the truck for holding at the AFF and/or transported to CRITFC member tribes for translocation.
- All other protocols remain the same.

### **Type of outage required**

**Impact on facility operation** (FPP deviations)-No impact to facility operations.

**Impact on unit priority** -No impact on unit priority

**Impact on forebay/tailwater operation**- No impact on forebay/tailwater ops

**Impact on spill**- No impact on spill

**Dates of impacts/repairs** – Dates of operation would be within the adult Lamprey migration season at Bonneville Dam (May through August); exact dates will be based on run timing and size. We would choose the optimal timing based on previous years records to determine dates.

**Length of time for repairs**- NA

**Analysis of potential impacts to fish:** N/A no anticipated impact, actions are in the LPSs

1. 10-year average passage by run during the period of impact for adults and juvenile listed species, as appropriate for the proposed action and time of year;  
<https://www.nwfsc.noaa.gov/research/divisions/fe/estuarine/oeip/g-forecast.cfm>
2. Statement about the current year's run (e.g., higher or lower than 10-year average);  
The current run of Chinook, Steelhead is below the 10-year average.  
The current year's day counts at Bonneville dam of Pacific lamprey are lower than the 10-year average, however, this is an uncorrected count.
3. Estimated exposure to impact by species and age class (i.e., number or percentage of run exposed to an impact by the action);  
No estimated impact, actions are in the LPSs

4. Type of impact by species and age class (increased delay, exposure to predation, exposure to a route of higher injury/mortality rate, exposure to higher TDG, etc.);  
No estimated impact, actions are in the LPSs

### **Summary statement - expected impacts on:**

#### **Downstream migrants- NONE**

**Upstream migrants (including Bull Trout)-** No anticipated impacts because the traps/rest boxes are in the LPSs and any water that discharges to the tailrace will be free of contaminants/scent through protocols discussed below.

Lamprey- currently, the LPSs and rest boxes are routinely checked by Corps staff during operations for sediment buildup, water levels, flow, mortalities and for overcrowding (fish holding instead of passing). in the event of mortalities and/or overcrowding, lamprey are scooped out of the rest box with a long-handled net. Human scent/contaminant in the rest box is avoided (hands are not used inside the rest box, latex gloves are worn). Trapping operations would be similar to the routine operations, except that the lamprey would be captured in a net rather than allowed to volitionally pass.

### **Comments from agencies**

Please see attachment [1](#), [2](#) and [3](#) for the CRITFC responses.

### **USFWS**

-----Original Message-----

From: Swank, David [mailto:david\_swank@fws.gov]

Sent: Tuesday, July 23, 2019 3:03 PM

To: Kovalchuk, Erin H CIV USARMY CENWP (US)

<Erin.H.Kovalchuk@usace.army.mil>

Subject: [Non-DoD Source] comments on 19BON31

Hi Erin,

Here are our comments on the lamprey trap locations MOC.

Dave

-We support the tribal lamprey translocation program as an additional pathway for adult migration to upstream tributaries, but not as the only pathway. The LPS's that the Corps has built at Bonneville Dam are a critical part of improving adult lamprey migration through the lower Columbia River.

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

-We will support the proposal as written (using CI LPS rest box and the WA AWS UMTJ rest box) 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. 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.

## **NOAA**

-----Original Message-----

From: Trevor Conder - NOAA Federal [mailto:trevor.conder@noaa.gov]  
Sent: Thursday, July 25, 2019 2:57 PM  
To: Kovalchuk, Erin H CIV USARMY CENWP (US)  
<Erin.H.Kovalchuk@usace.army.mil>; Hausmann, Benjamin J CIV USARMY  
CENWP (USA) <Benjamin.J.Hausmann@usace.army.mil>; Mackey, Tammy M CIV  
USARMY CENWP (US) <Tammy.M.Mackey@usace.army.mil>; Ritchie Graves  
<Ritchie.graves@noaa.gov>; Wertheimer, Robert H CIV USARMY CENWP (USA)  
<Robert.H.Wertheimer@usace.army.mil>  
Subject: [Non-DoD Source] Re: FPOM: Official Coordination 19BON31 MOC  
CRITFC LPS Collection

Erin,

I know there is concern over this MOC considering it is a departure over past practice in how the tribes have collected lamprey in the passage system for transport purposes. While NOAA is not directly responsible for lamprey passage, we do support the Corps and any concern they have with operations in FCRPS fish ladders, and we do support the tribes transport program in general. While I understand the tribes are concerned with meeting allocation goals, I think the project has a valid concern that folks removing fish from the passage way is not the way things were intended to work. I have the following comments and questions after our discussion at FPOM:

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?

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?

-Trevor

## **BON Corps of Engineers**

-----Original Message-----

From: Hausmann, Benjamin J CIV USARMY CENWP (USA)  
Sent: Thursday, July 25, 2019 8:50 AM

To: Kovalchuk, Erin H CIV USARMY CENWP (US)  
<Erin.H.Kovalchuk@usace.army.mil>; Mackey, Tammy M CIV USARMY CENWP  
(US) <Tammy.M.Mackey@usace.army.mil>  
Subject: RE: [Non-DoD Source] comments on 19BON31 (UNCLASSIFIED)

CLASSIFICATION: UNCLASSIFIED

I have also attached my comments.

While I don't normally comment on MOCs, I wanted to give some context to this one as well as describe why Bonneville project biologists oppose this request. The lamprey passage structures (LPSs) are volitional fishways described in the tribal recovery plan as the "primary" means of lamprey recovery with translocation being a supplemental or secondary means. We agree with this classification and with some version of an LPS in all of the Bonneville Dam adult fishways, we have gone to great lengths to install and maintain these valuable passage routes. We have never allowed the trapping and removal of any fish from our fishways for any purpose and this request would create a precedent of relaxing a long held fish protection measure as well as impede our congressionally authorized mission of fish passage. The proposed locations for fish removal are NOT traps and as such, they present both a feasibility challenge and a potential to impact passage of far more fish than just those being sampled (fish dropping out of the LPS or failing to enter at all due to scent/activity in the LPS)

The request to remove actively migrating fish from our fishways was made because CRITFC feels they are not getting enough fish for their translocation program. The request for lamprey at Bonneville has gone from 215 per tribe in 2016 to 2118 per tribe in 2019. Since the method for determining the number of lamprey requested is based on a percentage of the last two years passage averages, the requests have increased exponentially beyond what is feasible to collect. This indicates that there may be a need for a more nuanced method for determining annual lamprey requests more so than seeking to remove fish from fishways and diminish the passage success of the LPSs. The Tribal Guidelines for Translocation have two specific points (4G and 4H) that address what the protocol is during a low lamprey passage year. At the time this request to access the LPSs was made, neither of the actions laid out in those points had been taken. It seems prudent to maintain the integrity of the tribal guidelines by adhering to those protocol prior to pursuing unprecedented activities not mentioned in the translocation guidelines.

All parties agree that the best path forward is to target fish that haven't already made it to the top of the LPSs. This means targeting fish still in the tailrace that may never even successfully enter the fishways. Bonneville project biologists have identified multiple locations where we could facilitate tribal trapping by installing davits for trap deployment/retrieval. We currently have multiple davits that could be used for these efforts. We are also pursuing the fabrication of another lamprey trap in the Cascades Island fishway that could hopefully be available for use as early as next year.

We applaud the translocation program and have done everything we can at Bonneville Dam and elsewhere to facilitate its implementation and success. We share a common goal of lamprey recovery and are continuing to pursue novel means of lamprey collection and

passage. However, due to the potential impacts of trying to remove fish from volitional fishways, we do not feel it is worth the risk to our fish passage program.

**YAKAMA**

-----Original Message-----

From: Ralph Lampman [mailto:lamr@yakamafish-nsn.gov]  
Sent: Thursday, July 11, 2019 6:38 AM  
To: Kovalchuk, Erin H CIV USARMY CENWP (US)  
<Erin.H.Kovalchuk@usace.army.mil>Subject: [Non-DoD Source] Re: FPOM:  
Official Coordination 19BON31 MOC CRITFC LPS Collection

Hi Erin and all,

I have a Dr. appointment at 8:30am, so will not be able to call in, unfortunately.  
But appreciate the opportunity to comment here.

The Yakama Nation's position is that adult translocation is a key restoration tool for the recovery of the Pacific Lamprey, which the tribes have taken it upon themselves to implement, given the dire situation with the low passage rates at the mainstem Lower Columbia River dams. We are seeing a huge number/proportion of outmigrating juveniles being produced in Umatilla, Snake, and Yakima rivers where this has been implemented for some time now (& now seeing a great deal of increase in adult numbers in Umatilla and Yakima as well). When passage numbers are low, that means less adults are making their way up the river and it becomes even more important to help move them upstream. Yakama Nation conducts adult translocation not only in the Yakima Basin but also Wenatchee and Methow (since 2016) and now Okanogan subbasins (since 2017), essentially all the major production in the Upper Columbia River. We do not cherry pick small watersheds we want to restore - our vision is to restore the populations in the entire Upper Columbia and all ceded lands (and that is certainly true for the Umatilla and Nez Perce adult translocation programs as well). So when the number of translocated adults are low due to a low passage year, it's important to understand that affects the entire production in the region. We understand the importance of the adult passage studies that University of Idaho is undertaking this year (as well as last year). We certainly want to make sure they have enough to conduct the study. But we don't necessary think that the study should take precedence over everything else (such as the adult translocation work we are partaking). If the translocation program is curtailed due to low numbers, it seems logical for the sample size of the adult passage study to be adjusted to some degree (rather than the essential adult translocation programs being on the receiving end for all of this)? If we don't like that approach, then we as a group certainly ought to be a little more creative in how we find ways to keep both programs successful and productive. I think it goes without saying here, but the Yakama Nation supports the use of all other locations potentially available to help ensure both programs remain successful.

The passage rates are still near 50% at Bonneville Dam and there is still an unexplainable number/portion of adults being lost prior to reaching The Dalles Dam. We need to understand that the numbers we are discussing here through the use of alternative locations are just a small tiny fraction of this overall number here (essentially a drop in

the bucket). We are only trying to do what we can as a group to get more of these adults to their historical prime habitat in other areas (i.e. Mid and Upper Columbia and Snake) safely while we all do our best to resolve and tackle the current situation (especially adults being lost between BON and TDA and other dams). I really don't think any of what we are proposing here is unreasonable (especially given the big picture perspectives of the issues at hand here)?

Appreciate all of your understanding and support on this issue,

Ralph Lampman  
COLUMBIA RIVER| Honor. Protect. Restore

Yakama Nation FRMP, Pacific Lamprey Project

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#### Minutes from 24 July 2019 FPOM Meeting

5. **Lamprey translocation trapping (Lorz)** – The MOC was sent out late yesterday afternoon. Porter explained that the tribes have not met their translocation numbers and the need to find alternative locations to increase collection numbers. There are two locations being looked at – CI LPS which used to be a trap but was made volitional and the WA SH AWS rest box#2. They want to start as soon as possible but at least have it set for next year. CRITFC worked with Hausmann to identify several tail race locations which are not included in the MOC since they do not impact other fish. Jackson described the desperate situation that the tribes see for lamprey migration. The allocation was raised from 4 to 8% of the run due to the lack of lamprey making it upstream. The allocation is all for translocation not harvest. Swank needs to discuss the MOC with his internal staff. He has concerns about the UofI study not getting enough lamprey and therefore being a waste of time and money. Swank would like monitoring to know whether the proposed action will have an effect on the rest of run. Swank thinks he could support a one year temporary trial but not a permanent change. Conder asked if the allocation number would be adjusted for the low run. Jackson said that the allocation is based on the previous two years and his position during a low run is he would like to get his hands on every fish to get them upstream. If the run is low enough, CRITFC would consider collection at Willamette per Tribal Translocation Guidelines. Porter said that this will not impact the number of UofI fish; this is a different location than UofI gets fish. Swank agrees with working out additional locations but has concerns that this action could impact other fish in the LPS. Jackson thinks that this is no different than when the CI LPS terminus was a trap so there is many years of data. Porter pointed out that the project checks the rest boxes and sends out MFRs that could would indicate a potential problem. Porter can come up with a research proposal looking at impact. Swank needs to discuss this internally. Wertheimer said the goal of getting this fish above the dam is good but the location of the proposed trapping is where the fish have a high probability of making it above the dam. Porter said that the problem is even if a fish makes it over BON it has a 50% chance of making it above TDA. Wertheimer asked if it was possible that they are spawning in the BON pool. Porter said it is possible but very few of the PIT tagged fish show up on the tributaries that have detectors. Setter asked about juvenile success. Jackson said the screw traps are not good for collecting lamprey but the numbers have

still increased greatly. They have yet to have a PIT tagged juvenile come back as an adult. The comment period is open until 24 July.

**Final coordination results – This MOC has been withdrawn by CRITFC.**

-----Original Message-----

From: Laurie Porter [mailto:porl@critfc.org]  
Sent: Monday, October 07, 2019 2:53 PM  
To: Kovalchuk, Erin H CIV USARMY CENWP (US)  
<Erin.H.Kovalchuk@usace.army.mil>  
Subject: [Non-DoD Source] draft minutes

Hi Erin,

I want to clarify that we submitted the responses to comments, but that we are not currently pursuing the MOC at this time. We see completing the CI AWS trap as a priority and we have communicated that to the Corps.

We have a Lamprey Conservation Team meeting on Thursday from 1-5. Could the Lamprey CI AWS trap/ MOC topic occur in the morning so that Lamprey folks could call in?

Thanks,

Laurie

**After Action update** (After action statement stating what the effect of the action was on listed species. This statement could simply state that the MOC analysis was correct and the action went as expected, or it could explain how the actual action changed the expected effect (e.g., you didn't need to close that AWS valve after all, so there was no impact of the action). List any actual mortality noted as a result of the action)

Please email or call with questions or concerns.

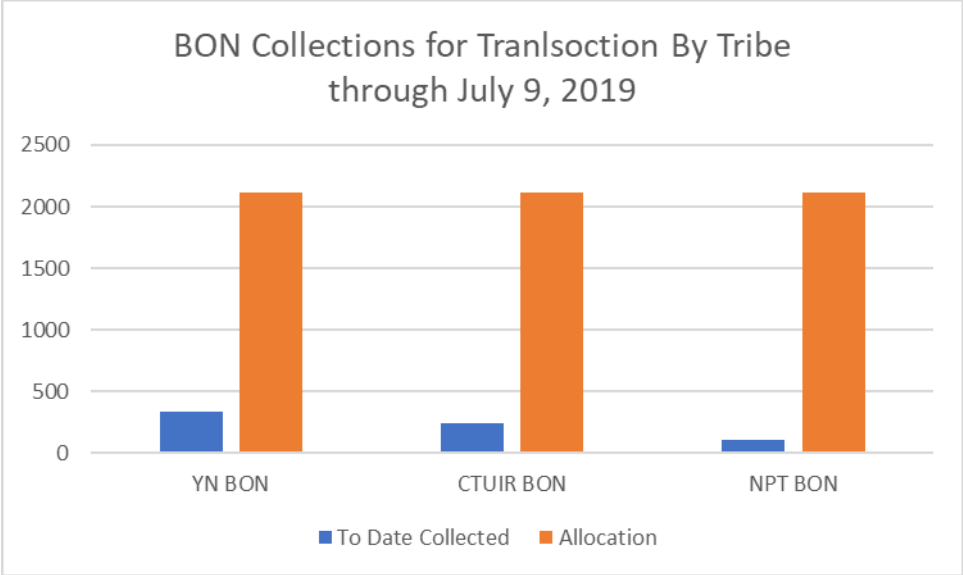
Thank you,

Erin

Erin Kovalchuk  
NWP Operations Division Fishery Section  
Columbia River Coordination Biologist  
[Erin.H.Kovalchuk@usace.army.mil](mailto:Erin.H.Kovalchuk@usace.army.mil)



Appendix A

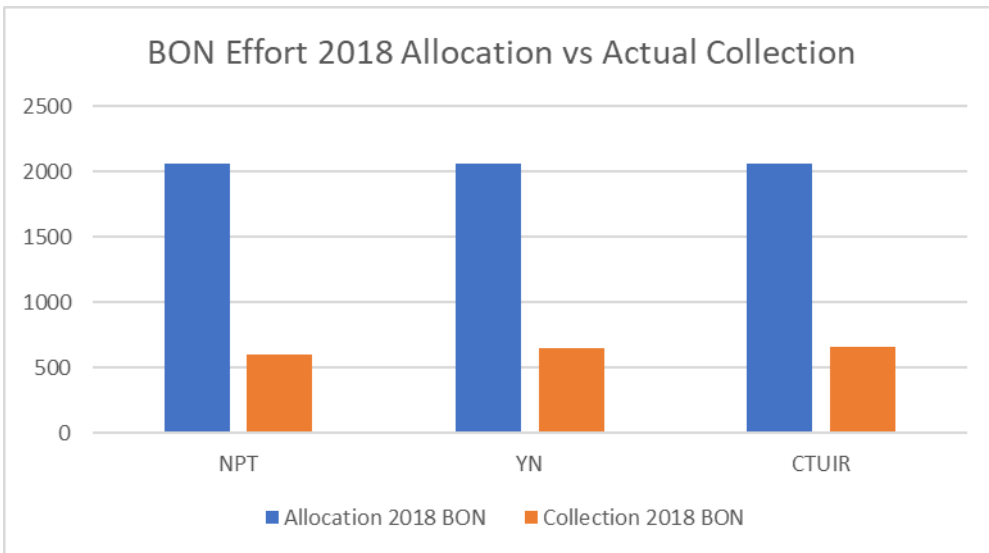
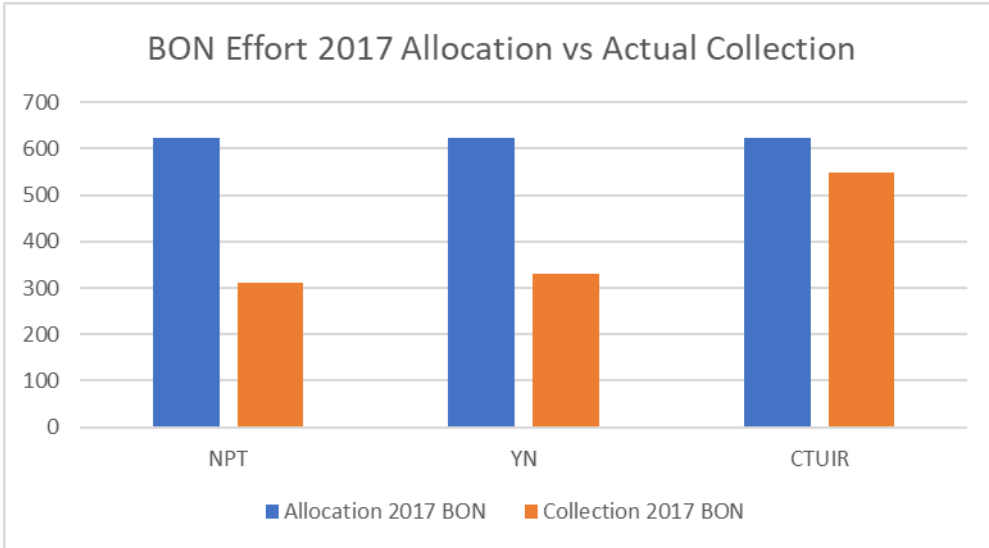


| BON    | To Date Collected<br>07082019 | Allocation | % collection |
|--------|-------------------------------|------------|--------------|
| YN BON | 334                           | 2118       | 0.16         |
| CTUIR  |                               |            |              |
| BON    | 238                           | 2118       | 0.11         |
| NPT    |                               |            |              |
| BON    | 103                           | 2118       | 0.05         |

| TDA    | To Date Collected<br>07082019 | Allocation | % collection |      |
|--------|-------------------------------|------------|--------------|------|
| YN TDA |                               | 86         | 1030         | 0.08 |
| CTUIR  |                               |            |              |      |
| TDA    |                               | 40         | 1030         | 0.04 |
| NPT    |                               |            |              |      |
| TDA    |                               | 75         | 1030         | 0.07 |

| JDA    | To Date Collected<br>07082019 | Allocation | % collection |      |
|--------|-------------------------------|------------|--------------|------|
| YN JDA |                               | 34         | 798          | 0.04 |
| CTUIR  |                               |            |              |      |
| JDA    |                               | 31         | 798          | 0.04 |
| NPT    |                               | 25         | 798          | 0.03 |

Appendix B



Appendix C: Cascade Island Rest box



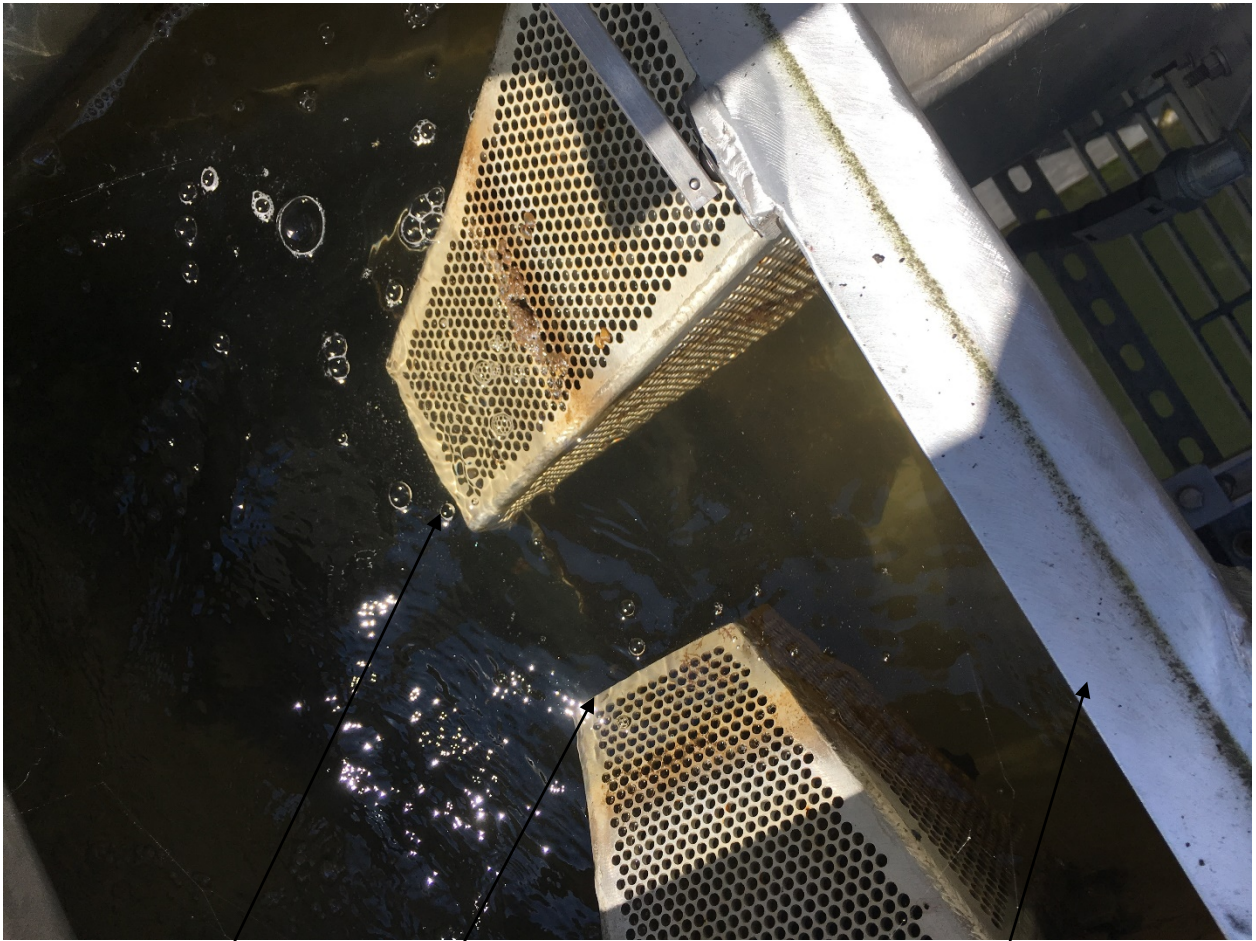
The lamprey will be collected from the box with the nets (see arrow) as they travel voluntarily from the LPS entrance to this point.

Note: water is pumped out from the lower box to the tailrace.

Thus, we will ensure no contaminants/scents are in the water.

The entrance to the Cascades Island LPS is immediately upstream of the fishway entrance, the LPS terminated in a trap previously, but the ladder now extends to the forebay outlet and lamprey voluntarily enter and pass via this route.

WA UMTJ LPS Rest Box 2



The lamprey will be collected from the box with the nets (see arrow) as they travel volitionally from the LPS entrance to this Rest Box #2.

There are 2 ramps that extend into the Bonneville Dam WA shore fishway downstream of the adult count station and upstream from the upstream migrant transit junction. After passing through rest boxes the fish continue to the forebay volitionally.

The new LPS ramps connect to the existing LPS in the make-up water supply channel.