This letter is in response to Council staff recommendation for lamprey project # 2007165000 in particular and BPA's lamprey program in general.

Project # 200716500

Project # 2007165000 was submitted as a multi-agency collaboration addressing the highest ranking critical uncertainty as outlined by the Columbia Basin Lamprey Technical Workgroup (TWG). This project had two minor office or laboratory components and the bulk was made up of large scale, directed field efforts aimed at trying to answer some basic questions for lampreys. For example, the proposal addresses questions such as: (1) where are these fish found? (2) how many are there in different watersheds? (3) what are some basics of their life history, such as migration timing? Answers to such questions were deemed critical by the TWG and many biologists and managers for the restoration, conservation, and management of lampreys in the basin. Further, such issues were discussed and considered critical to lamprey conservation and management by the action agencies at the Lamprey Summit held in Portland in 2004.

As this project made its way through the NPCC and BPA review process, it seemed likely be funded based on the positive reviews it was receiving. In the end, the Mainstem-Systemwide Review Team (MSRT) recommended this project be funded, but at a lower budget amount. In fact, some members of the MSRT thought this project was so important, it should be part of the core program. The Independent Science Review Panel (ISRP) recommended partial funding of an objective to develop a manual of standardized sampling protocols for lampreys. In their review, the ISRP asked what the role of the Lamprey TWG was in this proposal. In fact, the Lamprey TWG convened a special meeting to discuss this proposal and it was universally agreed upon that this proposal should go forward. Since all of the researchers on other lamprey projects in the basin are on the TWG, all were aware of this proposal and ready to contribute and collaborate. Although the MSRT was aware of critical issues related to lampreys in the basin (e.g., as discussed in the TWG's critical uncertainties document prepared for Columbia Basin Fish and Wildlife Authority), there was no evidence that the ISRP used such information in their decision.

The original FY 2007-09 budgets for this project were about $600K, $900K, and $1M. Lots of field work, three agencies, and collection of much needed information added up to substantial, but reasonable, budgets. The MSRT recommended a flat rate budget of $500K per year for three years to address all aspects of the study. The ISRP, as mentioned earlier, recommended funding only the objective dealing with development of the sampling protocols manual. The NPCC staff collated this information and, in the end, agreed with the ISRP and recommended about $66K per year for three years—all to develop the sampling protocols manual. We have no idea how the NPCC came up with this amount of funding, nor can we explain the logic behind their decision. The illogical nature of their decision becomes clear when one considers what seems to be happening to lamprey research and management within the Fish and Wildlife Program (FWP). As I discuss below, recent NPCC recommendations have virtually eliminated lampreys from the FWP. Thus, if things stay the way they are currently, Project # 200716500 will

develop a manual of standardized sampling protocols for lampreys—*but no one will be sampling lampreys in the basin*.

As such, I strongly disagree with the draft recommendation for this project as put forth by the NPCC staff. I argue that full funding should be allocated to complete this project. We (all sponsors of this project) did not create our budgets in a vacuum—they reflect the true costs of conducting this type of collaborative study in today's research environment. We see no validity in simply funding the development of a sampling protocols manual if no one is going to be seriously sampling for lampreys in the basin. Funding only this objective gets the sponsors "all dressed up, with nowhere to go". If the Council or BPA decide to uphold the staff recommendation for this project, they will be ignoring all that was discussed at the Lamprey Summit, be in direct contrast to recommendations put forth by the Lamprey TWG, showing a lack of proactive thinking and adaptive management, and undermining efforts directed towards the conservation and management of these ancient, unique species of fish.

Lamprey studies within the FWP

Although the NPCC staff recommendation for our project is troubling, that anything to do with lampreys is seemingly being eliminated from the FWP is deeply disturbing. After the Lamprey Summit in 2004 and with the recent work of the Lamprey TWG, many scientists and managers in the region thought that the future outlook for lampreys in the basin was going to change. Perhaps these fish would get some of the attention they deserve and receive funding commensurate with the issues being addressed. It seemed as though folks might be starting to think proactively about lampreys—trying to avoid crisis management and dealing with issues only when absolutely forced to. However, recent draft NPCC staff recommendations for lampreys in the FWP have changed all this. Instead, issues discussed at the Summit, the work of the TWG, and concerns about lampreys from scientists, managers, and Columbia Basin treaty tribes, are being ignored. Fundamentals of watershed, river, and salmonid ecology seem to be forgotten. Apparently, the issues are fourfold: (1) should BPA even fund lamprey research and management studies (i.e., is it within their mandate?); (2) is lamprey work a mainstem priority right now?; (3) should BPA fund new lamprey work without a coordinated review of current lamprey work?; and (4) is lamprey work in the provinces of more value than that in the mainstem? That these questions are even being asked illustrates that the NPCC staff is out of touch with current thinking on lamprey issues in the basin.

I propose the following answers to these questions about funding lamprey research:

(1) There is no question that BPA should be at least partially responsible for funding lamprey studies in the basin. All one needs to consider is that the dams were listed by the Lamprey TWG as the most serious limiting factor for lampreys in the basin. The Lamprey TWG is comprised of virtually all of the experts on lamprey research and

management in the basin. Thus, it seems axiomatic that BPA should be funding some studies related to lamprey research and management.

(2) If lamprey work is not a mainstem priority now, when will it be? Will we wait, as we did for salmon, until these fish are listed under the Endangered Species Act? Or would it be more prudent to show some forward, proactive thinking towards lamprey issues and deal with them now, before a bigger crisis hits? Why isn't more funding for lamprey studies a priority? It's not as though such work would significantly decrease the FWP budget. Even if all the lamprey studies within the FWP—ongoing and new—were funded, it would still represent less than 5% of the total FWP budget.

(3) Regarding a review of current lamprey work, the Lamprey TWG has been reviewing research, issues, and uncertainties for lampreys in the basin. This group has produced a document that clearly outlines their findings and was intended, in part, to assist funding agencies in deciding where dollars should be spent. As far as we can tell, this information is being completely ignored.

(4) Is lamprey work in the provinces of more value than that in the mainstem? This is a troubling question that shows a lack of understanding of basic lamprey biology. The Pacific lamprey—which is a key species of concern in current and proposed studies—is an anadromous fish that probably does not home to natal streams and is distributed throughout the basin. Given this life history, how can provinces (which are a man-made construct) be any more or less important than the main upstream corridor? In reality, the mainstem Columbia and Snake rivers *and* the numerous tributaries and watersheds are all important to lamprey ecology. To think otherwise ignores the basic biology and ecology of these fish and the connectivity of tributaries and watersheds. As an aside, although our proposal, 200716500, was submitted to the MSRT, it was actually designed to conduct work in many provinces.

Finally, I am concerned about the message being sent when two major players in the research and management of our natural resources in the basin (i.e., the NPCC and the BPA) take a completely different approach to lamprey issues than their sister agencies. As I've alluded to earlier but can't emphasize enough, the recent decisions of the NPCC staff contrast with and undermine everything that was discussed at the Lamprey Summit—a meeting where all of the action agencies (USACE, NOAA-Fisheries, USFWS, ODFW, WDFW, and CRITFC) committed themselves to a future that included serious consideration of lamprey conservation and management. I urge the NPCC and the BPA to join with these agencies and do their part for the future of lampreys in the Columbia River basin.

Sincerely,

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