



American Fisheries Society

Western Division

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November 10, 2003

Mr. David Allen
United States Fish and Wildlife Service
911 NE 11th Avenue
Portland, Oregon 97232

Dear Mr. Allen

Your agency was petitioned in January of this year by eleven conservation groups to list four species of lamprey as threatened or endangered under the federal Endangered Species Act (ESA). The four species of concern are the Pacific lamprey (*Lampetra tridentata*), river lamprey, (*L. ayresi*), western brook lamprey (*L. richardsoni*), and Kern brook lamprey (*L. hubbsi*).

The Western Division of the American Fisheries Society (WDAFS) regularly reviews and comments on topics related to aquatic resources. The mission of the American Fisheries Society (AFS) is to improve the conservation and sustainability of fishery resources and aquatic ecosystems throughout the world. As such, the membership of the AFS has a strong interest in the conservation and protection of aquatic resources, including the protection of the four species of lamprey listed in the recent petition sent to your organization. In response to the petition, as well as concern expressed by our membership, the WDAFS formed the Lamprey Review Committee (LRC) to review the petition. The primary objectives of the LRC are to:

- Review the petition for completeness and scientific accuracy.
- Make a recommendation to the WDAFS Executive Committee on whether WDAFS should support the petition, and
- Make recommendations for any further action that WDAFS should conduct regarding the petition.

The WDAFS found the petition itself to be well written, however, the data presented do not strongly support the conclusions. The primary weakness of the petition is the overall paucity of information on lampreys. The depth of the information available on the four lampreys varies by species.

We concur with the petition that a strong case can be made for a full status review of Pacific lamprey based on counts at dams on the Columbia, Umpqua, and Snake Rivers. These data indicate a significant decline in Pacific lamprey numbers from drainage areas comprising a significant portion of the species' range. For example, counts at the Ice Harbor and Winchester dams were measured in the tens of thousands during the

early 1960's, but declined to the low hundreds or less by 2001. We recognize that the validity of the absolute numbers from these counts was deemed unreliable by Moser and Close (2003). However, the sheer magnitude of the decline in Pacific lamprey abundance evident in these data makes it safe to conclude that there has been a significant drop in abundance, even if the absolute numbers are unknown. Moser and Close (2003) did note that the counts were conducted in a uniform manner, and that they provide the only historical measure of relative abundance for Pacific lamprey.

The petition's justification for listing the three remaining species (river, western brook, and Kern brook lampreys) was not as strong. There are few accounts of these species in the literature cited, and no trend data for the three remaining species were presented.

The available data do suggest that Pacific lamprey numbers have declined, possibly substantially, over the last several decades, and that the three other species may be in decline as well. Therefore, the WDAFS recommends that the United States Fish and Wildlife Service (USFWS) conduct a thorough review of the status of the Pacific, river, western brook, and Kern brook lampreys.

The petition to list the four species of lamprey under the ESA provides a solid beginning, although a considerable amount of additional data collection and analysis will need to be conducted to fully evaluate their status. The LRC members possess a substantial amount of expertise regarding the four lamprey species, and stand ready to assist the USFWS in this endeavor as the Service sees fit.

Sincerely,

Tom McMahon, President