

Final Report of the Emergency Fish Passage Ad Hoc Committee

Prepared for the Atlantic Salmon Implementation Team

April 24, 2020

Background

In response to COVID-19 pandemic, the Atlantic salmon Implementation Team (IP) formed an Ad Hoc Committee (Committee) pursuant to the Collaborative Management Strategy (CMS). The Committee was established in early April 2020 to undertake emergency scenario planning to facilitate the continuation of fish passage facility operation at hydroelectric projects in the Gulf of Maine DPS of Atlantic salmon. The committee's focus was on fishways that rely, at least in part, on trap and truck operation for Atlantic salmon fish passage and/or broodstock collection including the Ellsworth, Milford, Orono, Brunswick, and Lockwood Projects.

Specifically, the Committee was charged with the following;

- Identify the potential operational changes and consequences of operational changes that are necessary to comply with federal, state, local and industry level policies and recommendations necessary to protect human health and safety in light of the COVID-19 pandemic.
- Identify a range of contingency measures that could be implemented to minimize disruption to fish passage operations at hydroelectric projects to protect endangered Atlantic salmon and maximize compliance with requirements in FERC licenses, ESA Section 7 biological opinions, and other regulatory or legal requirements.
- Identify a range of contingency measures that could be implemented to protect other diadromous species at fish passage facilities within the GOM DPS of Atlantic salmon.
- Identify a range of contingency measures for broodstock collection at Milford. o This should include a scenario where the transport of sea-run broodstock from Milford to Craig Brook is not possible. Please identify at least three options for this scenario (e.g., open fishway/fishways to allow free swim; trap and truck upstream; don't allow passage). Please include the costs and benefits associated with each scenario, as well as the committee's preferred option and the rationale supporting this option.
- Coordinate with licensees, Maine Department of Environmental Protection, FERC staff, and others as necessary to gather information and make informed decisions regarding contingency measures.

Implementation

The Committee consisted of representatives from MDMR (S. Ledwin, Mike Brown), USFWS (A. Harris, O. Cox), NMFS (J. Murphy, M. Buhyoff), and the Penobscot Indian Nation (D. McCaw). J. Murphy served as chair.

The Committee met expeditiously over several weeks to provide the IP with a draft report by April 14, 2020. Three meetings have been conducted to date with meeting notes provided below. The Committee sought significant input from the Licensee of the Ellsworth, Milford, Orono,

Brunswick, and Lockwood Projects (Brookfield) to identify measures that could be implemented to minimize disruption to fish passage operations at each project. The Committee and Brookfield considered compliance with FERC licenses, ESA Section 7 biological opinions, other regulatory or legal requirements in addition to the health and welfare of staff associated with fish passage operations at each project.

Recommendations

The Committee's preliminary recommendations and response to the IP's charge were presented on March 13, 2020. The Committee's recommendations are presented in a separate Excel spreadsheet. Notes from the meeting are being prepared the IP. During the meeting, we were not able to identify a mitigation alternative for fish passage at the Brunswick Project. The Committee was able to present preferred mitigation alternatives for the Milford, Orono, Lockwood, and Ellsworth Projects.

Emergency Ad Hoc Fish Passage Committee

April 13, 2020 Meeting Notes

Attendees: MDMR (M. Brown; S. Ledwin); USFWS (A. Harris; O. Cox); PIN (D. McCaw); NMFS (M. Buhyoff; J. Murphy); Brookfield (K. Maloney; Richard Dill; Kevin Bernier; Jason Seyfried; Matt LeBlanc; Adam Brown)

Note: This was the third Ad Hoc Committee meeting. During the meeting, the Committee reviewed potential contingency measures to ensure safe passage of Atlantic salmon and other anadromous species at the above mentioned projects with staff from Brookfield. Brookfield Power is the FERC Licensee of each project under consideration.

Introductions

A draft table presenting potential mitigations options under various Covid 19 staffing scenarios was provided to the participants on April 9th for discussion purposes during the meeting. The table is attached separately.

Brookfield provided an overview of their current state of operations under Covid 19. There are presently no limitations to operating each fish passage facility under existing Covid 19 conditions. Brookfield also stated that hiring additional staff to operate fishways at the Milford, Orono, Ellsworth, Lockwood, and Brunswick Project are not feasible given time constraints concerning their contracting processes (e.g., background checks, training, etc.). Brookfield also stated that crews may not be able to shift operations among different river systems (e.g., Orono crews may not be permitted to operate Lockwood facilities) due to ownership issues. Brookfield will however investigate this option.

DMR stated that existing social distancing practices remain in place for State employees; however, their operations at Milford and Lockwood remain achievable. Staff shortages may effect operations at the Brunswick Project.

Anna stated the health and safety of our visitors and employees are the top priorities for the U.S. Fish and Wildlife Service. To guide our operational response to the novel coronavirus (COVID-19), the Service is following current guidance from the Centers for Disease Control, Office of Personnel Management, DOI Office of Emergency Management, and state and local public health authorities.

NOAA staff remain in teleworking status.

Saco River

While not among the projects currently under consideration of the Ad Hoc Committee, Brookfield provided an update on current conditions of fish passage facilities. All sites on the Saco River will remain in normal Operations, however, the trucking of American shad may be impacted by the limited resources.

Ellsworth Project

The Ad Hoc Committee reviewed three potential options at Ellsworth with Brookfield Power including:

1. Consult with Brookfield on potential to hire qualified additional contractor to truck migrants upstream. Goal would be to truck ~30 - 40k.
2. MDMR staff operate fish trap and truck migrants. Truck no more than upstream stocking goal of 315,000 herring.
3. Close fishway and cease trucking operations.

Brookfield reiterated that Option 1 is not feasible for the corporation due to hiring constraints. MDMR stated Option 2 is not feasible for their agency. Thus, the group concluded that Option 3 is the only viable option should Brookfield staff or contractors be unable to operate the Ellsworth fishway due to Covid 19 restrictions (e.g., illness or access restriction).

There was discussion regarding a scenario of a significant number of Brookfield staff out due to illness, but still able to provide one crew member to operate the lift. Some portion of the alewife stocking goal may still be attained if MDMR were able to assist with trucking, even if just a couple days per week. While there was no commitment to this option, it was agreed that it may be discussed further in a worst-case scenario.

Milford Project

The Ad Hoc Committee reviewed three potential options at Milford with Brookfield Power including:

1. If MDMR is not available, open crowder and Denil to permit volitional passage on an interim basis. Allow early run to pass (May) and re-evaluate weekly to assess potential to collect broodstock.
2. If USFWS staff not available, MDMR transports broodstock to hatchery.
3. Provide volitional passage of all upstream migrants (i.e., open fishlift crowder gate and operate Denil)

The participants concluded that Option 1 would provide the best mitigation option should DMR crews be unable to collect broodstock and FWS are unable to truck broodstock to the hatchery due to Covid 19 restrictions (e.g., illness or access restriction).

While not directly related to any current Covid 19 restrictions, the Ad Hoc Committee recommended that Brookfield open the Denil fishway concurrently with the fishlift on April 15 as DMR will not be collecting any broodstock under existing conditions in April and perhaps May. However, Brookfield intends to follow the license requirements of operating the fish lift as the means for upstream passage and will operate the Denil fishway as a contingency fish passage if the fish lift becomes non-operational for any reason (e.g. mechanical issues, lack of staff to inspect and make daily operational adjustments).

Orono Project

The Ad Hoc Committee reviewed three potential options at Orono with Brookfield Power including:

1. Consult with Brookfield on potential to hire qualified additional contractor to truck migrants upstream.
2. MDMR staff operate fish trap and truck to Milford headpond.
3. Close fishway and cease trucking operations.

Brookfield reiterated that Option 1 is not feasible for the corporation due to hiring constraints. MDMR stated Option 2 is not feasible for their agency. Thus, the group concluded that Option 3 is the only viable option should Brookfield staff or contractors be unable to operate the Orono fishway due to Covid 19 restrictions (e.g., illness or access restriction).

Lockwood Project

The Ad Hoc Committee reviewed three potential options at Lockwood with Brookfield Power including:

1. Consult with Brookfield on potential to hire qualified additional contractor to truck migrants upstream.
2. Agency staff truck salmon upstream. Herring not passed.
3. Close fishway and cease trucking operations.

Brookfield reiterated that Option 1 is not feasible for the corporation due to hiring constraints. MDMR stated Option 2 is not feasible for their agency. Thus, the group concluded that Option 3 is the only viable option should: a) Brookfield staff be unable to operate the fishlift; or b) MDMR staff are unable to transport salmon to the Sandy River, The Ad Hoc Committee did recommend Brookfield consider relocating staff from the Orono Project (if it is shut down due to Covid 19) to transport river herring to the Mainstem of the Kennebec and/or salmon to the Sandy River if MDMR staff be unable to transport fish due to Covid 19 restrictions (e.g., illness or access restriction).

Brunswick Project

The Ad Hoc Committee reviewed three potential options at Brunswick with Brookfield Power including:

1. Consult with Brookfield on potential to hire secondary contractor to cull invasive species, pass salmon, and truck herring upstream.
2. Fishway is set in volitional mode to allow anadromous passage. No culling and no trucking.
3. Fish passage facility is closed until June 1st and trucking operation discontinued.

Brookfield reiterated that Option 1 is not feasible for the corporation due to hiring constraints. MDMR stated Option 2 is not feasible for their agency. MDMR objected to Option 2 due to concerns for invasive species and the lack of access to suitable spawning habitat upstream and unnecessary impacts to fish moving upstream and downstream of the Brunswick Project. NMFS did not recommend Option 3 as it could affect Atlantic salmon and there is little evidence that white catfish are passed at the project in April or May.

The group was unable to reach a consensus recommendation for the Brunswick Project.

Next Steps

The Ad Hoc Committee will prepare a brief report of these conclusions for the Atlantic Salmon Implementation Team. The Ad Hoc Committee will present their preliminary findings to the Atlantic Salmon Implementation Team on April 12.

Emergency Ad Hoc Fish Passage Committee

April 4, 2020 Meeting Notes

Attendees: MDMR (M. Brown; S. Ledwin); USFWS (A. Harris; O. Cox); PIN (D. McCaw); NMFS (M. Buhyoff; J. Murphy)

Notes: This was the second Ad Hoc Committee meeting. During the meeting, the Committee continued to identify reasonable contingency measures to ensure safe passage of Atlantic salmon and other anadromous species at the above mentioned projects while considering the health and safety of fish passage staff. The Committee developed three mitigation options for each project within an Excel Spreadsheet. The three mitigation options were designed to address Covid 19 limitations if either Brookfield (BF) or MDMR staff are not available to operate the trapping and sorting facilities at each project.

Brunswick Project

At the Brunswick Project, BF operates and maintains the fishway. MDMR is responsible for trapping, trucking, and culling invasive species. Atlantic salmon hatchery broodstock are not collected at the project. MDMR expressed concerns for invasive species in the Androscoggin River if the fishway is opened without invasive culling. MDMR also did not expect any significant reproduction of alosines unless fish are able to be trucked upstream to spawning habitat. NMFS expressed concern for Atlantic salmon if the fishway does not operate.

Three options were identified for addressing fish passage at the project if operations become impaired due to Covid 19 (see below). The Committee was not able to identify a preferred option at this time.

Lockwood Project

At the Lockwood Project, BF operates and maintains the fishway. MDMR is responsible for trapping and trucking anadromous species to spawning habitat. Atlantic salmon hatchery broodstock are not collected at the project. Three options were identified for addressing fish passage at the project if operations become impaired due to Covid 19 (see separate attachment). The Committee agreed Option 1 could be the preferred mitigation measure for the Lockwood Project.

Orono Project

At the Orono Project, BF operates and maintains the fishway. BF is also responsible for trapping and trucking anadromous species upstream of the project. Typically, alosines are trucked to the Milford Project headpond. Atlantic salmon are either release into the Milford Project headpond or transported to the Milford fishlift for broodstock purposes. Three options were identified for addressing fish passage at the project if operations become impaired due to Covid 19 (see separate attachment). The Committee agreed Option 3 could be the preferred mitigation measure for the Orono Project.

Milford Project

At the Milford Project, BF operates and maintains the fishway. The project passes most alosines volitionally. However, MDMR also traps and transports alosine to upstream spawning habitat in the

watershed. MDMR also collects Atlantic salmon hatchery broodstock at the project. Broodstock collected at the Milford Project are the primary source of broodstock for the Penobscot River. Broodstock collected at Milford are transported to the USFWS hatchery for spawning.

Three options were identified for addressing fish passage at the project if operations become impaired due to Covid 19 (see separate attachment). The Committee agreed Option 3 could be the preferred mitigation measure for the Milford Project.

Ellsworth Project

At the Ellsworth Project, BF operates and maintains the fishway. BF is also responsible for trapping and trucking anadromous species upstream of the project. Atlantic salmon are not collected for broodstock purposes. Three options were identified for addressing fish passage at the project if operations become impaired due to Covid 19 (see separate attachment). The Committee agreed Option 1 could be the preferred mitigation measure for the Ellsworth Project.

Next Steps

The Committee schedule a conference call with Brookfield to seek their input on the various mitigation options including a preferred alternative. The call will take place on April 10, 2020.

Emergency Ad Hoc Fish Passage Committee

March 31, 2020 Meeting Notes

Participants: Oliver Cox, Anna Harris, Jim Pellerin, Gale Wippelhauser, Sean Ledwin, Mitch Simpson, Casey Clark, Paul Christman, Mike Brown, Sean McDermott, Jeff Murphy, Don Dow, Matt Buhyoff, Dan Tierney, Kelly Maloney, Richard Dill, Adam Brown, Matt Leblanc, Dan McCaw.

Jeff M: Opened the meeting and addressed the excel sheet as a document to help guide discussion.

Kelly M: Summarized an update on where we are today as they influence how we move forward.

- She stated that it would be good to have a follow up call in a week or so to resolve any conflicts between parties. This call would be a much smaller working group and would include one individual from each agency/entity to help clarify priorities¹.
 - o Need to setup a meeting and have agencies/entities identify their point of contact
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Agency Updates on staff state of affairs:

- NOAA is under work from home requirements.
- Brookfield is under work from home requirements for their compliance team through the month of April and will reevaluate by the end of the month.
 - o Three distinct fish passage teams have been formed with a lead and 5 team members (Richard-Penobscot and Union, Jay-Kennebec, Matt L-Andro and Saco).
 - o The fisheries leads will be maintaining the 'normal course of action' for the fishway season. They are hiring their fishway crews for each river/project for the 2020 season. They are eliminating congregating of these crews to limit exposure between members of these teams.
 - o The operations crews are asked to report in teams of 2 at a single site and their workspace (i.e. the powerhouse) is off limits to other workers. This will prevent cross exposure at sites where it is feasible. At sites where this is not possible, the operations teams will be taking on fish operations responsibilities at specific sites (Mattaceunk).
- DMR is under directive to maintain social distancing at worksites. DMR personnel cannot share a vehicle for transportation for any work-related activities. Most DMR staff are working from home. DMR intends to complete the tasks that are usually carried out by DMR when feasible. DMR will prioritize some activities, such as stocking, to ensure that key objectives are met given the added difficulty to work in this environment.
- The Tribal community is very concerned about this epidemic and has made strong recommendations to limit exposure of the tribal community to the epidemic. No PIN staff can return to Indian Island currently to limit exposure to the community
- USFWS. Most regulatory staff are working at home to limit exposure, especially at Craig Brook. With the exception of mission critical fieldwork, they are not able to carry out fieldwork. Hatchery staff are isolating each hatchery to the extent possible, which is challenge because of tourists. Craig Brook has two teams, which are isolated from each other. Green lake is at a

¹ Note: Resource Agency participation in the Ad Hoc Committee will consist of 2 staff from DMR, USFWS, NMFS and 1 staff from PIN

skeleton crew and is stocking smolts now. Once smolts are off station, they will make teams to limit exposure of staff. These are in place until the end of April.

Project by Project walk through

Brunswick:

- Kelly M. The operations team is separate from the fishway at this facility. So BF does not believe that DMR access to the site will be limited at this site.
- Kelly M. Under scenario 1 on the excel sheet, even if fishway operations staff are not able to be at the site, operations will be able to operate the fishway. The fishway should not have to be closed and it is BF priority to ensure that their project continues to provide fish passage. They would make sure the fishway is “open, functional, operational”. The fishway would be open and clear of debris.
- Sean L. Scenario 2 is the limited DMR staff scenario. DMR is always limited on staff to truck fish from ‘terminal fishways’ such as Lockwood. DMR is trying to limit the projects that they undertake this year and spreading staff too thin. Even under a limited staffing scenario, DMR would prefer to delay opening the fishway or to not open the fishway. At terminal fishways, DMR’s opinion is that allowing fish to pass puts those fish at higher risk than keeping them below the project. This is the case at Brunswick. There is no spawning habitat above Brunswick to which alewives have access to. Passing alewives upstream will increase mortality for alewives while not producing juveniles for the 2020 season. Also, opening the fishway and not sorting fish would allow white catfish upstream, which would have long term consequences. DMR AND IFW are concerned that passing catfish at Brunswick may pose a greater risk than the potential benefits of passing herring and salmon.
- Jim P. Operating the fishway with sorting is preferred for as long as possible. If sorting is not possible the fishway should not be open. Volitional passage is not an option for IF&W.
- Kelly M. Asked to clarify should we (DMR?) be planning to close the fishway now or should we be planning to operate the fishway with limited staff.
- Sean L. DMR would prioritize trucking fish at Lockwood over Brunswick. So would like to plan for not operating the Brunswick fishway.
 - o Gail W. Clarified, DMR would still likely do some stocking of Sabattus Lake run to ensure the Androscoggin River alewife run continues.
- Matt Buhyoff. Repercussions exist if project operators do not pass fish in normal times. We are lucky at Brunswick that we can operate in a volitional manner and be able to pass salmon that way. Also, culling of invasive species should not require a lot of staff effort. NMFS believes that the fishway can operate while reducing the threats of invasive species.
- Jeff M. There is precedent for dealing with emergency consultations if there are significant changes to operations that may impact endangered species in emergency situations. An after-the-fact consultation is one way this could be accomplished. An emergency consultation would potentially be needed if we shutdown the fishways.
- Kelly M. The agencies need to decide what operations the agencies prefer BF to follow. This should be brought to the meeting next week.
- Mike B. If DMR is stocking fish, DMR has 4 people working. If just operating the sorting facility, one person could staff the site. Therefore, only one person would be needed to cull out white catfish.

- Don Dow. Another solution would be to put a fish jump in the lower fishway. This would limit most fish from entering the fishway, but would allow ATS to enter the fishway.
- Matt L. Does not remember the specifics of if a fish jump would prevent white catfish, but was concerned it would not limit them.
- Jim P. Based on 2019 observations of various jump barrier settings, a jump would more likely create a velocity barrier and not a suitable vertical jump barrier. Volitional passage with a jump barrier is too risky and based on the information we have not suitable for adequately preventing invasives. Focus was on white catfish, but carp are also a concern and are likely stronger swimmers/jumpers than white catfish.
- Mike Brown. Because the lower pools are tidally influenced, a jump in the lower part of the fishway could be limited in efficacy by the tides. DMR typically sees white catfish when the water starts to warm in late July, early August. DMR does think that if the fishway is closed, there would be some injury to shad, likely very little impact to alewives.
 - o In regards to fishway timing. Brunswick alewives start to show up the first week of May and stop by the first-second week of June. At Lockwood, the season is longer because the blueback herring run comes in later than the alewives. Mike indicated that white cats would start moving at the beginning of June when water temps increase.
- Jeff M. The resource agencies should have a follow up to iron out differences and we should move on to other projects for the sake of time.
- Matt L. There is a concern that if fish are collected from the fishway and then the fishway is closed, BF would still need to shutdown the fishway. A fishway full of fish is an issue to empty.

Lockwood:

- Jeff M. Exclusively trap and truck. There is no volitional passage at the project. BF operates the lift and conducts sorting activities. DMR trucks salmon, shad, and river herring.
- Gail W. DMR stocks some tier 1 ponds (E.g. Wesserunsett) with alewife, some headponds with blueback herring, and some out of basin ponds.
- Kelly M. BF can keep operations separate from fishway crews. Separate gates and facilities are available for the separate crews. If BF lost its seasonal staff, operations will not be able to take over fishway operations because it is too much effort at this site. BF recognizes its goal to pass fish and that is their primary goal. They may be able to shift resources from a lower priority project, such as Orono, to this project to maintain fishway operations. BF does not have trucks to move fish from this project.
- Sean L. DMR is able to truck fish at this site with additional physical distancing measures in place. Again, we will likely prioritize our operations because trucking will not be as efficient with social distancing measures in place. Salmon trucking can be accomplished with one staff member. If there were a shelter in place order, DMR would likely not be allowed to truck fish.
- Craig K. DMR can accomplish the alewife stocking and have developed contingency plans for stocking operations. Stocking fish will require 2 staff, but they can drive in separate vehicles from the project to the stocking site.
- Jeff M. Summarizing: absent a shelter in place order, DMR should be able to carry out stocking at this location, correct?
- Sean L: Yes, that is correct. It is also important to recognize that some of our staff, those with kids, will likely be working part time to work with family obligations.

- Kelly M. Operations staff will be able to maintain the downstream fishway at this site if fishway crews cannot.

Hydro Kennebec:

- Kelly M. At high flows salmon can ascend past the Lockwood project and enter the fishway at HK.
 - o No fish passed in 2019, 2 salmon passed in 2017, she thinks.
 - o BF cannot maintain social distancing at this site and would like to recommend not running the fishway at this site.
- Matt Buhyoff. Not running the fishway at HK should be fine, given circumstances.
- Don Dow. Agree, but if circumstances change for the better it would be good to operate the project. Kelly M stated the lift could be operated on occasion to make sure it's ready to go.
- Paul C. DMR would also support not operating the fishway at HK.

Milford:

- Two fishways: Fishlift that can be operated in an automatic or manual mode. There is also a denil that is not typically used.
- Richard D. There is trap for the denil being fabricated and can be installed in July. This will take some construction effort (4 weeks) and low flows.
- Kelly M. The primary lift and the sorting facility are sufficiently distanced from the power house to allow separation of the operations staff from the fishway staff. There are also separate gates to access the site for each crew. Fishway crews will not be able to access powerhouse. If conditions get worse and DMR is not able to staff fishway, the BF operations staff will still be on site and they could pass fish volitionally at this site.
- Mitch S said that white catfish occur in the reach of river upstream of Milford and that the Milford fishway is not operated to prevent catfish passage. Mitch S. If DMR is able to access the site, 2-3 staff can operate the sorting facility with 2 or so people on the roof sorting fish and one person at the counting window. If DMR is not available to operate the fishway, DMR would prefer to open the fishway to ensure that ATS are able to pass the project. If the lift breaks, free swim of fish through the denil would be ok with DMR. The denil should be open anyway, to allow more fish to move upstream. DMR is not prioritizing trucking alewives at Milford because they do have upstream access to spawning habitat.
- Oliver C. USFWS would like to continue to collect broodstock if they have the staff to do so. If they do get to a point where they do not have staff to collect broodstock, USFWS supports the decision for allowing fish to swim upstream. They would like to see the denil opened and, if possible, putting in cameras to monitor passage in the fishways.
- Richard D. As far as the hopper cam goes, BF has used a camera in the past but reviewing the camera data would add a significant amount of effort. Of note, if the denil is opened it would prevent us from getting a count of fish, as the fish going through the denil would not be able to be counted.
- Sean L. DMR has also suggested that allowing more fish to pass during May could limit effort and meet agency goals.
- Kelly M. Is USFWS planning to collect broodstock.

- Oliver C. At this time USFWS plans to be able to collect broodstock, but they will likely not be able to do as much of it. Either as less times per day, less days per week, or limiting the timeframes which they collect.
- Jeff M. If conditions stay as they are today, the fishway will be operated, DMR will sort fish, and USFWS will collect Broodstock. If USFWS is not available for broodstock collection, fish will be passed into the headpond. If DMR is not able to sort fish, fish will be passes into the headpond.

Orono:

- Jeff M. Trap and truck facility only. No volitional passage. Herring are trucked upstream of Milford facility. Salmon are taken to DMR staff at Milford to be processed. The resource agencies that signed the Penobscot Multiparty Agreement are responsible for long distance transport of herring.
- Kelly M. Operations and fishway crews do share a gate and some facilities, but BF believes they can maintain social distancing at the site. They plan to operate as normal. If conditions get worse, operations cannot truck fish at this site. So the Orono fishway would need to be shutdown in that scenario. Operations staff will maintain the downstream fishway no matter what. BF believes that shutting down this fishway will not have a significant impact on passage of ATS because ATS that approach Orono go to Milford without much delay.
- Kelly M. BF does intend to carry out all fishway studies as planned this season. They do think they can carry out all fishway studies under the current circumstances.
- Mitch S. DMR thinks BF's strategy should be fine. DMR staff do not usually go to this site under normal operations.
- Kelly M. This is one site that, if staffing at another facility has a staffing need, staff from this site could go to a higher priority site. They would only do this in consultation with the agencies.
- Oliver C. If BF is operating the site, what will BF do if they get a salmon at this site?
- Richard D. BF could release the fish upriver or transport the fish to DMR at Milford if conditions allow.
- Kelly M. If the fishway was shutdown, would it require consultation?
- Jeff M. yes, we would need to an after the fact, but I do not know if it would be formal or informal right now. If we can devise ways to protect salmon, we are doing the right thing.

Ellsworth:

- Terminal fishway. BF contracts to transport river herring into Graham lake during river herring harvest. BF staff take over river herring staffing after harvest has concluded. Trapping operated by BF and BF is always on site.
- Kelly M. Plan at this site is status quo. BF plans to hire the same contractor to truck alewife. Operations can enter from a separate area to separate themselves from the harvester. There can be a bit of crowding during the alewife harvest with lobstermen and other public at the site.
 - o If conditions get worse and fishway staff are no longer on site, operations staff will not be able to pass fish on their own and BF would need to shutdown the fishway.
 - o Agencies need to give BF guidance on priorities for fishway operations if we are faced with staffing shortage issues. Which fishways should be staffed for sure? Which terminal fishway should be closed first.

- Mitch. DMR does not see a problem with BF's plan. DMR only plays a guidance role at this site for suspected AQC fish or other salmon issues.