Hi Dana,

I had received the ARLAC letter directly from Barbara Skuly after she and I had spoken. I think it's important to note the US F&W and NH F&G have scrutinized these sites in the past and prescribed various measures for downstream fish migration and protection, and then via triggers, upstream migration. The projects have downstream sluices specifically designed (in part by US F&W) to move fish safely downstream. During migration season, we pass 25 cfs through these sluices, and we have to install bars within our trash racks which effectively reduce the bar spacing to about 3/4 inch (see photo attached). This keeps most fish out of our turbines entirely so that they can ride the sluice downstream. This sluice water obviously cannot be used for generation, which is a hit. Also, the fish bars clog with trash much more readily than the open bars. So there is significantly more maintenance during fish season. The job of installing and removing fish bars every year is also time consuming. I guess I would argue we're doing everything reasonable to protect fish.

I think Barbara's point about testing for mortality is interesting, but not easy to accomplish. Anecdotally, we never see dead fish in the tailrace, but I'm not sure anyone would, unless there were scores of them. During fish season we do occasionally pull up a dead or dying fish on our trashracks. Probably no more than ten a season. We don't know if these are week individuals, or got stuck in the fish bars that are designed to help them. But the numbers are not great.

I hope this information is useful.

Bob

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