

CNL(26)34

Review of Draft Conservation Commitments Report

Date	Party / jurisdiction	Draft CCR – April 2026
April 2026	United States	USA - Updated Draft CCR submitted April 2026

Overview of Conservation Commitments Report

Overall Comments / Recommendations
<ul style="list-style-type: none"> The Review Group noted the impacts of dams are described at high level. The estimates of present and target habitat units are given. Maps presented during the interview provided greater details and understanding. But the impact of limited habitat availability on the present-day population is not described and there is no explanation of how this additional habitat will enhance salmon populations.

Consultation and Engagement

CCR reference	Review Question	Comments / Recommendations
E.1. E.2.	Are the questions in the ‘Consultation and Engagement’ section of the CCRs answered fully?	Yes.

Stressors

CCR reference	Review Question	Comments / Recommendations
Stressor Justification	Are the top three stressors identified in the Party’s / jurisdiction’s stressor analysis used as the basis for the CCRs?	Yes.
	If not, are the justifications provided for the substitutions adequate?	Not applicable.

Stressor 1

CCR reference	Review Question	Comments / Recommendations		
S.1.a.	Are NASCO's theme areas identified?	Yes.		
S.1.b. S.1.c. S.1.d.	Is the impact of the stressor on wild Atlantic salmon described clearly?	Yes.		
	Are there no more than three actions for this stressor?	Yes.		
		Action 1	Action 2	Action 3
S.1.1.d S.1.2.d S.1.3.d.	Does the action have a clear and measurable tangible outcome to improve conditions for salmon survival through the removal or diminishment of the identified stressor (i.e. in line with NASCO's Strategic Goal)?	<p>In part.</p> <p>The goal is to remove 4 lower-most hydro dams in Kennebec River, making 85,000 additional habitat units fully accessible to salmon.</p> <p>However, dam removal is not forecast to be completed during reporting period.</p>	<p>Yes.</p> <p>Removing Cherryfield Dam and replacing it with a nature-like fishway will allow unimpeded access to 5,700 units of high-quality habitat for salmon and remove impediments to downstream migrants.</p>	<p>Yes.</p> <p>Remove the Mayo Mills Dam on the Piscataquis River, and the Lemon Stream Dam on the Kennebec River watershed, will provide unimpeded access to 28,000 salmon habitat units.</p> <p>We note this may be an overestimate of the effect because there is a fishway on the Mayo Mill Dam which provides some access to the 27,000 units upstream, but we recognise that the CCR assumes this is very ineffective.</p>

S.1.1.c. S.1.2.c. S.1.3.c.	Does the action have a clear starting point (baseline) against which progress towards the outcome can be measured?	Yes The dam removal program is described in 4 phases, with the starting point being 0 to indicate prior to the start of phase 1.	Yes The dam removal program is described in 3 phases. The starting point is phase 1 which has already been completed.	Yes. The dam removal program is described in 3 phases. The starting point is 0 to indicate prior to the start of phase 1.
S.1.1.e. S.1.2.e. S.1.3.e.	Are clear interim goals / milestones identified for this action?	Yes. The four phases of the dam removal program are described in sufficient detail to judge whether they have been delivered or not.	Yes. The three phases of the dam removal program are described in sufficient detail to judge whether they have been delivered or not.	Yes. The three phases of the dam removal program are described in sufficient detail to judge whether they have been delivered or not.
S.1.4.	Does this stressor include a quantitative baseline and tangible outcome to enable progress towards the achievement of the Strategic Goal to be measured?	<p>In part.</p> <p>It states there are “currently less than 59,000 units of suitable and accessible habitat available to Atlantic salmon”, and a unit is 100 m². ‘Less than’ is not an ideal baseline, but a habitat suitability model is being developed, which should clarify this situation.</p> <p>The tangible outcome goal is fully restoring access to an additional 85,000 or 86,000 units in the Kennebec basin (depending on whether the 1,000 for the Lemon Stream is counted in the 85,000 for the 4 lowermost dams or not; and noting removing the 4 dams might not complete during the reporting period), and significantly improving access to 5,700 (Cherryfield Dam) and 27,000 units (Mayo Mill Dam), through combination of dam removals and fish passage improvements.</p>		

Comments / Recommendations

It is noted that the general assumption is that the presently available habitat is limiting salmon production, and opening access to more habitat would result in higher salmon abundance. This has not been demonstrated in the CCR, though, nor in the interview.

Once the dams are removed, a more direct metric would be a measure of salmon distribution, spawning areas or juvenile abundance.

In section S.1.1.b it is stated that the national aim is for 90,000 habitat units, but later the work in the Kennebec watershed is due to create an ‘additional 85,000’ habitat units. Is this correct as it would mean only 5000 for the rest of the USA area?

Does the additional 85,000 units in the Kennebec from Action 1 include the contribution from removing Lemon Stream Dam? This would be double counting.

There is no explanation of how this additional habitat will enhance salmon populations. Is habitat a limiting factor at the present abundance state?

Stressor 2

CCR reference	Review Question	Comments / Recommendations		
S.2.a.	Are NASCO's theme areas identified?	Yes.		
S.2.b. S.2.c. S.2.d.	Is the impact of the stressor on wild Atlantic salmon described clearly?	<p>In part.</p> <p>The stressor title is misleading as it reads that smolt production is a stressor in itself, whereas the actual stressor is the mortality of downstream migrating smolts at dams.</p> <p>The impact of dams on downstream passage was recognised, but no quantitative estimate of the impacts was provided.</p>		
	Are there no more than three actions for this stressor?	Yes.		
		Action 1	Action 2	Action 3
S.2.1.d S.2.2.d S.2.3.d.	Does the action have a clear and measurable tangible outcome to improve conditions for salmon survival through the removal or diminishment of the identified stressor (i.e. in line with NASCO's Strategic Goal)?	<p>No.</p> <p>This action describes a human co-ordinating activity associated with salmon conservation (performance standards), but the benefit to salmon from this specific action is not being measured</p>		
S.2.1.c. S.2.2.c. S.2.3.c.	Does the action have a clear starting point (baseline) against which progress towards the outcome can be measured?	<p>Yes.</p> <p>The starting point is set as 3, the number of dams that presently meet or exceed their performance standard.</p>		
S.2.1.e. S.2.2.e. S.2.3.e.	Are clear interim goals / milestones identified for this action?	<p>In part.</p> <p>The milestones rise from 3 dam meeting performance standards, to 12 by the end of the reporting period. But without details of</p>		

		<p>the standards etc, it will be difficult to review progress.</p> <p>The performance standards aren't described so we have no way to judge their effectiveness.</p> <p>Extraordinary measures have been proposed to achieve performance standards but not implemented yet – creating uncertainty over whether they will be implemented?</p>		
S.2.4.	Does this stressor include a quantitative baseline and tangible outcome to enable progress towards the achievement of the Strategic Goal to be measured?	<p>In part.</p> <p>The baseline and tangible outcome are described In terms of the numbers of dams meeting or exceeding their performance standards.</p>		
<p>Comments / Recommendations</p> <p>This action describes a human co-ordinating activity associated with salmon conservation (performance standards), but the benefit to salmon from this specific action is not being measured.</p>				

Stressor 3

CCR reference	Review Question	Comments / Recommendations
S.3.a.	Are NASCO's theme areas identified?	Yes.
S.3.b. S.3.c. S.3.d.	Is the impact of the stressor on wild Atlantic salmon described clearly?	Yes.

	Are there no more than three actions for this stressor?	Yes.		
		Action 1	Action 2	Action 3
S.3.1.d S.3.2.d S.3.3.d.	Does the action have a clear and measurable tangible outcome to improve conditions for salmon survival through the removal or diminishment of the identified stressor (i.e. in line with NASCO's Strategic Goal)?	<p>In part.</p> <p>The nature of the action is to minimize the impacts of the West Greenland fishery which, at recent levels is estimated to be about 142 spawning adults or 10% of the total spawner abundance.</p> <p>However, there is no detail on how, or to what extent, the fishery would be minimized, though it is explained that further detail will come after negotiations at NASCO.</p>		
S.3.1.c. S.3.2.c. S.3.3.c.	Does the action have a clear starting point (baseline) against which progress towards the outcome can be measured?	<p>Yes.</p> <p>The Starting point is the present quota allocation for the West Greenland fishery, at 27 tonnes.</p>		
S.3.1.e. S.3.2.e. S.3.3.e.	Are clear interim goals / milestones identified for this action?	<p>In part.</p> <p>End goal is 0 tonnes catch at West Greenland from 2028, but there is no detail on how this will be achieved in practice</p>		
S.3.4.	Does this stressor include a quantitative baseline and tangible outcome to enable progress towards the achievement of the Strategic Goal to be measured?	<p>In part.</p> <p>The proposed stressor baseline is the 5-year (2018-2022) 2SW return rate of Penobscot hatchery smolts being 0.182%.</p> <p>The proposed tangible outcome is “a non-negative trend to marine survival metrics”.</p>		

		<p>Thus, the baseline and outcome are not expressed in the same units so they cannot be compared – the baseline is a return rate, the outcome is a trend (albeit a trend in return rate).</p> <p>Given that no trend is described as the baseline, it is not possible to judge whether a non-negative trend in future is progress or not.</p>
--	--	---

Comments / Recommendations

It is noted that details of this action remain to be developed but will depend in part on negotiations at the West Greenland Commission, NASCO, during March to June 2026.

It is recommended that a clear baseline metric be developed to allow for tracking progress