

Target Flows: GC Interview Summary

Introduction

Over the past several weeks, Compass has held interviews with members of the PRRIP Governance Committee to discuss the role that target flows play for each of the member organizations. This summary highlights key themes that emerged in those conversations and synthesizes the range of perspectives across all members of the GC*.

The purpose of this round of interviews was to get a sense of the roles that target flows play for each GC member – both within the context of their participation in the Program and outside the context of the Program. From a better understanding of these roles, the intention is that the GC will be able to engage in more informed discussions about the potential scope of an evaluation of target flows in the First Increment Extension.

Key Themes

Collectively for the PRRIP GC, target flows fill four main functions:

- Guiding Program water management to benefit the four target species,
- Regulating instream flow to protect and restore ecosystem function,
- Serving as an accounting system to track Program progress, and
- Providing a currency for facilitating negotiation and formalizing contributions to the Program.

There is, of course, considerable interplay between these functions. However, the relative importance of each function to each GC participant, and certainly the degree to which target flows seem to be the right tool for each job differs widely between various groups. The discussion below lays out perspectives on these four functions.

Target Flows as a tool to guide Program water management to benefit the four target species

All GC members described that one of the main intentions for target flows is to guide the use of Program water assets to provide identified benefits for the target species. However, all GC members also recognized that as the Program has learned more and more about the effects of those flows, there appears to be less evidence of a clear connection between the quantity of water the Program manages and measurable benefits for the target species. While everyone agrees that keeping some level of water in the river is clearly important, many GC members recognize that the current science doesn't support at least some dimensions (i.e., timing and/or quantity) of the current set of target flows for the target species.

* Note that perspectives from the State of Wyoming are not included as part of this summary, as we were not able to coordinate an interview in time.

As a management tool, there is wide agreement that the lack of flexibility in the target flows is a key limitation on the Program's ability to use water in novel ways or at times of year that may provide greater benefit for the target species. Several GC members brought up examples of situations where they believed that retiming flows at certain times of year or in certain year types could achieve greater benefits than the target flows themselves. Inherent to this perspective is the notion that the target flows bake in a set of priorities that are static and inflexible, despite Program priorities that may shift year to year, and the acceptability of trade-offs between species or other Program priorities that may shift over time.

Pointing to lessons coming from the science developed by the Program over the last 13 years, many GC members described that the primary function that target flows now play is to guide the use of Program water to achieve credit for its water projects, rather than to achieve an anticipated species benefit (this role is described further below).

Target Flows as a means to regulate instream flow to protect and restore ecosystem function

Several GC members noted that the original intent of the target flows was much broader than defining flows to guide water management for the target species. There was an explicit intention at the time to define a set flows that were protective of the needs of a number of listed and non-listed species, as well as broader river processes and functions necessary to restore and maintain a functional Platte ecosystem.

Part of this intention was to bring the regulation of flow into one coherent system, rather than address protection of flows on a case-by-case basis. The target flows therefore explicitly have an integrated and ecosystem restoration focus and address the needs of a wide range of ecosystem values. In this light, some GC members talked about the Program's target species as proxies for the full suite of these other values.

From this perspective, one value of having target flows is to provide benefits to other species and broader processes that may be outside a narrower interpretation of the mandate of the Program (though these GC members also noted the Program's fourth management goal to contribute to keeping other species off the Endangered Species list). For example, protecting hydrologic connectivity to riparian communities has a wide range of benefits, only some of which are related to the target species. Similarly, promoting flows that are capable of moving sediments has a wide range of benefits, which are difficult to quantitatively tie directly to the target species.

In discussing the regulatory role that target flows play to protect these broad ecosystem values, many of the GC members described other regulatory mechanisms that fill a similar role, including the states' new depletions plans, state water laws, seniority of water rights, and transboundary water management agreements (e.g., the North Platte Decree and other export agreements). Several GC members noted that a key benefit of target flows is their clear definition of when water is and is not available for use, though they also maintained that these other regulatory mechanisms do as much or more to protect instream flows. Though these other agreements are tied in various ways to the target flows themselves, these GC members

71 felt that should the specific flow targets change, these agreements will continue to protect flow
72 in the Platte.

73 **Target Flows as an accounting system to track Program progress toward the water milestone**

74 All GC members spoke at length about the role that target flows play in providing a reference
75 point against which the Program scores potential water projects, evaluates the actual operation
76 of existing projects, and tracks overall Program progress toward the water milestone of 130-
77 150 thousand acre-feet. Despite any shortcomings that various GC members identified with the
78 flows targets themselves, all GC members were aligned in their thinking that the accounting
79 system is useful for the purposes of communicating in specific terms about the ability of
80 particular water projects to contribute to the Program's progress. This is a key function for all
81 GC members. The specificity of that approach provides everyone with a clear understanding of
82 the contributions the states and water users need to make in order to ensure ESA coverage for
83 their water projects, and of the credit they and the Program get for each of those projects.

84 There is a range of opinion on the way that credit is given to Program for reducing shortages to
85 target flows. Given that target flows address a full range of ecosystem values and that the
86 Program gets credit for reducing shortages to any target flows, some GC members expressed
87 their view that once Program water comes to sit in the EA, they are happy for the Service to
88 make choices about how best to use it based on their own priorities at the time. Others find it
89 frustrating that not all Program water ultimately goes toward meeting target flows designated
90 for the Program's target species that have verifiable effects.

91 **Target Flows as a currency for facilitating negotiation and formalizing contributions**

92 Several GC members described at length that far and away, the main benefit of the target flows
93 is that they formed a clear conceptual link between environmental needs of the system as
94 defined by the Service and the money that the States and the Bureau could bring to bear on the
95 problem. Target flows therefore acted as a common currency that allowed transparent
96 negotiations around clear commitments that now form the foundation of the Program. That
97 clarity, according to these members, is one of the key factors that drives the continued success
98 of the Program.

99 The states' and water users' contributions to the Program to reduce shortages to target flows
100 was explicitly a compromise between the quantities of water required to recover ecosystem
101 functions and the quantities of water and money that were politically possible to achieve.
102 Target flows provided a common language and common currency to enable (1) explicitly
103 quantified expectations for contributions, (2) a scoring system to evaluate the ability of
104 individual water projects to contribute to the water target, and (3) an accounting system to
105 track overall Program progress. In short, target flows are a framework that provided assurances
106 to all parties about the core structure of the Program in the context of early negotiations.
107 Despite disagreement on the specific daily flow recommendations, the framework was robust
108 enough to allow everyone to commit to the Program and to an adaptive process and work
109 together toward a better understanding of flows.

Re-defining target flows: questions, concerns, and fears

Concerns about an effort to evaluate and presumably update target flows took three main forms. Nearly all GC members brought up these concerns in various ways:

- The first concern was about the topic of updating the targets using the best available science. There is lingering frustration about the process and information that was used to develop and support the original flow targets. While there is general interest in using new information to develop better-supported target flows, everyone agrees that a great deal of attention needs to be given to laying out a process that is appropriately collaborative and makes use of the best available information in a fair and transparent way. In addition, rules around what constitutes a reasonable trigger for updating information underlying the targets should be laid out ahead of time.
- The second category of concern that nearly everyone raised was that an evaluation of target flows that uses new science will necessarily lead to new daily flows, which will in turn change the scoring of existing and potential projects for both the Program and for participants more broadly. A wide range of concerns flow from this change: operational rules and procedures for storing and diverting flow will need to be updated as well as infrastructure that has been designed with the pattern of storage and releases inherent to the current target flows in mind. More generally, there is a concern among the GC members that changing the scoring system will make it difficult to understand where the Program sits relative to the water milestone and what that means for ESA coverage of the projects.
- Lastly, any changes to scoring of water projects will have unclear implications for what new scores would mean for the long-term commitments of the Program participants, for ESA coverage for Program participants, and for the broader regulation of water use among the three states. Several GC members brought forward this concern, and made it clear that the Program and the GC should carefully weigh the expected benefits and costs of a thorough evaluation of target flows to the species, to the Program staff, and to the relationships among the Program participants.

Discussion Questions:

- To what extent can the four functions described above be disentangled? While certainly convenient, is it strictly necessary for the same mechanism to play all of these roles? Specifically, could a Second Increment be formed on the basis of contributions that are not clearly linked to specific species needs?
- It is clear that an evaluation of target flows is not simply a technical task – an evaluation of (and eventual choice to adopt) new target flows would have to consider the trade-offs against several concerns described above. Could implications to governance arrangements be included as criteria (i.e., decision objectives) in the development of new flow targets?