



**PLATTE RIVER RECOVERY IMPLEMENTATION PROGRAM (PRRIP or PROGRAM)
Governance Committee (GC) Quarterly Meeting Minutes**

Tuesday, June 12, 2018 – 2:00 PM – 5:30 PM
Wednesday, June 13, 2018 – 8:00 AM – 12:00 PM
Note: All times Mountain.

Meeting Location:

Wyoming Water Development Commission – Basement Meeting Room
6920 Yellowtail Road
Cheyenne, WY 82009

Governance Committee (GC)

State of Wyoming

Harry LaBonde – Member

State of Colorado

Don Ament – Member

Carlee Brown – Alternate

JoJo La – Alternate

State of Nebraska

Jeff Fassett – Member (2018 GC Chair)

Upper Platte Water Users

Dennis Strauch – Member

Bob Mehling – Alternate

Owen Williams – Alternate

Downstream Water Users

Mark Czaplewski – Member

Don Kraus – Member

Brian Barels – Member

Kent Miller – Member

Executive Director’s Office (EDO)

Jason Farnsworth, ED

Chad Smith, DED

Bridget Barron

Dave Baasch

Scott Griebing

Bruce Sackett

Seth Turner

Kevin Werbylo

Bureau of Reclamation (Reclamation)

Brock Merrill – Alternate

U.S. Fish and Wildlife Service (Service)

Michael Thabault – Member

Eliza Hines – Alternate

Matt Rabbe – Alternate

Environmental Entities

Bill Taddicken – Member

Colorado Water Users

Alan Berryman – Member

Deb Freeman – Alternate

Kevin Urie – Alternate

Audience Members

Jeff Cowley – State of Wyoming

Tom Econopouly – Service

Rick Wilson – JEO

Justin Stine – JEO



TUESDAY, JUNE 12, 2018

Welcome & Administrative

Fassett called the meeting to order at 2:11 PM Mountain Time and the group proceeded with introductions.

GC Decision – *LaBonde moved to approve the following GC Minutes; Ament seconded. Minutes approved.*

- *March 13-14, 2018 GC Quarterly Meeting, as amended by the State of Colorado.*
- *April 20, 2018 GC Executive Session Conference Call.*
- *April 30, 2018 GC Executive Session Conference Call.*
- *May 29, 2018 GC Executive Session Conference Call.*

Program Committee Updates

Land Advisory Committee (LAC)

Czaplewski provided an update on the latest LAC activities. The LAC met on April 2 and on May 16-17. The main items of discussion include review of the Public Access Program with recommended changes; Land Management Plan updates; and a land tour (at the May meeting).

Water Advisory Committee (WAC)

Turner provided an update on the latest WAC activities. The WAC met on May 1. The main items of discussion include several WAP project updates; reporting guidelines for water leasing projects; Phelps County canal groundwater recharge report; WAP fact sheets being prepared by the EDO; COHYST; state and federal depletion plans; and a water project tour.

Technical Advisory Committee (TAC)

Merrill provided an update on the latest TAC activities. The TAC met on May 10. The main discussion items include whooping crane monitoring, sediment augmentation, recommended PRRIP publications, Dippel off-channel sand and water design, and pallid sturgeon.

Finance Committee (FC)

LaBonde said the FC had not met since the last GC meeting. Farnsworth requested a short FC meeting at the conclusion of the GC meeting today or tomorrow for consideration of two items.

Program Outreach Update

PRESENTATIONS

- Dave Baasch presented on *Habitat Selection by Whooping Cranes within the Platte River Valley and the Migration Corridor*, at the Audubon Crane Festival on March 24, 2018 in Kearney, Nebraska.
- Patrick Farrell presented on *Habitat Selection by Sandhill Cranes within the Platte River Valley*, at the Audubon Crane Festival on March 24, 2018 in Kearney, Nebraska.
- Jason Farnsworth presented on Platte River water accounting and ways that future water management activities may influence crane habitat at Rowe Sanctuary on March 31, 2018.
- Patrick Farrell presented on *Sandhill Crane Roosting Habitat and River Flows*, at the Platte River Basin Ecosystem Symposium on June 5th, 2018 at the Crane Trust Nature and Visitor Center.
- David Baasch presented two sessions at the Platte River Basin Ecosystem Symposium on June 5th, 2018 at the Crane Trust Nature and Visitor Center. The first session is *Whooping Crane Habitat along the Big Bend of the Platte River* and the second is *Least Tern and Piping Plover Nesting Ecology in Off-channel Habitats*.

47 **EXHIBITS/SPONSORSHIPS**

- 48 • The Program exhibited at the Audubon Crane Festival March 22-24, 2018 in Kearney, Nebraska. We
49 made 134 contacts.
- 50 • The Program was a Station Sponsor for the 2018 Nebraska Envirothon, which was held on April 25th,
51 2018 at the Niobrara State Park in Niobrara, NE. The Envirothon has high school teams competing in
52 seven areas of environmental studies; soils, aquatics, forestry, wildlife, range, invasive species, and
53 current environmental policy.
- 54 • The Program sponsored the school days of the Fort Kearney Outdoor Expo on May 10th & 11th, 2018
55 in Kearney, Nebraska. The school days provides more than 50 hands-on educational activities and
56 demonstrations to connect youth to the great outdoors. The school days are attended by more than 2,000
57 area students.

58 **UPCOMING PRESENTATIONS/EXHIBITS**

- 59 • Jason Farnsworth will be part of a panel on Platte River Stewardship at Rowe Sanctuary on June 20,
60 2018. The panel is part of a class for Senior College of Central Nebraska.
- 61 • Jason Farnsworth will be presenting a Program update at the North Platte stop of the Nebraska Water
62 Tour on June 26, 2018.
- 63 • Don Ament will be presenting on *The Platte River Recovery Implementation Program and Ag*, at the
64 Colorado Ag Water Alliance 2018 Ag Water Tour in Sterling, Colorado on July 12, 2018.

65 **MEDIA/OTHER**

- 66 • After the March 2018 Governance Committee meeting, the Kearney Hub published an article regarding
67 the Program's Broad Scale Recharge and Slurry Wall projects and pending construction.
- 68 • The Kearney Hub published an article on March 23, 2018 regarding Program and Program partners
69 habitat work for whooping cranes and the resulting whooping cranes that utilized the habitat in March.
70 Dave Baasch was interviewed for the article.
- 71 • Rowe Sanctuary was featured in an article in the Kearney Hub Weekend Natural Resources section
72 (April 7-8, 2018) regarding their celebration of "American's Greatest Migration" and the 25th
73 anniversary of the Nebraska Environmental Trust. Habitat work and management by Rowe and its
74 partners that benefits cranes was the primary focus of the article.
- 75 • The Platte Basin Timelapse Project was featured in an article in the Kearney Hub Weekend Natural
76 Resources section (April 21-22, 2018). Michael Forsberg was interviewed and provided information
77 about the project and the 50 cameras tracing the river from the Rocky Mountain headwaters to where
78 the Platte flows into the Missouri River. The Program is a sponsor of the project.
- 79 • The North Platte Telegraph published an article on May 22, 2018 regarding the work being done on the
80 North Platte river related to the choke point. Jason Farnsworth and Justin Brei were interviewed for the
81 article.
- 82 • On June 3, 2018 The World Theatre in Kearney, Nebraska had the premiere screening of "*Follow the*
83 *Water.*" The documentary follows photographer Michael Forsberg and videographer Pete Stegen as
84 they travel 1,300 miles by bike, canoe and foot from one end of the Platte River Basin to the other.
85 NET Producer Christine Lesiak as well as Forsberg and Stegen were in attendance to answer audience
86 questions after the screening. The film was dedicated in memory of Jerry Kenny.

87 **PRRIP FY18 Budget and Work Plan**

88 Farnsworth discussed the status of the FY18 budget.

89 **PRRIP Indexing**

90 Merrill discussed the indexing worksheet. The new Program cash ceiling is \$214 million.



95 **PRRIP First Increment Extension**

96 LaBonde discussed the status of the Pathfinder proposal project. Wyoming does not believe it is appropriate
97 to bring this project forward, though Wyoming does support extension of the Program. The draft legislation
98 has been revised to remove this proposal. The legislation has been transmitted to the Wyoming
99 Congressional delegation. Discussions continue about whether that legislation can be moved forward this
100 year. Ament said Colorado has run this through the Governor's office and the Governor approves of the
101 Extension. Ament sent a letter to the Colorado Congressional delegation explaining the purpose of this.
102 Brown said she and La have been working with the Governor's office and handed off the proposed
103 legislation to the Colorado delegation last week. Sen. Gardner is in contact with Sen. Barrasso's office to
104 determine an initial path through the Senate. Kraus asked about the Upper Colorado River program funding
105 bill. La said that bill was moving on the House side and there may be a Senate hearing this week on that
106 bill. Fassett said Gov. Ricketts has talked to the Nebraska Congressional delegation about this and Fassett
107 has received numerous letters of support for the Extension from Nebraska parties.

108
109 Merrill discussed the public meetings for the NEPA process. Reclamation has received some comments on
110 the proposed Extension and is now in a holding pattern while the formal consultation process continues
111 with the Service. Thabault said the Service is running a little behind but there will be an internal review
112 draft of the biological opinion this week and he hopes to transmit a draft to Reclamation by the end of June.
113 The plan is to get back with this group (GC) in July to discuss the draft biological opinion. Thabault hopes
114 for a final biological opinion transmitted to Reclamation by August. Merrill said that would mean the NEPA
115 process would conclude in September of this year. Fassett asked if briefings up through the departments
116 have occurred. Thabault said there have been paper briefings to Service leaders in Headquarters, having a
117 draft biological opinion will precipitate more formal discussions. Merrill said he and Beardsley have briefed
118 the Commissioner and Merrill said he briefed the Assistant Secretary and both briefings were received very
119 well. Merrill said they are looking at a GC meeting in Denver the last half of July to discuss the draft
120 biological opinion.

121
122 Taddicken asked if it would be valuable to have Audubon's National Policy Team talk to members of
123 Congress about supporting the legislation. LaBonde and Ament suggested that supporting parties write
124 letters of support to their members of Congress. Fassett that would be most helpful once the path through
125 Congress is identified.

126
127 **PRRIP Pallid Sturgeon Process**

128 Smith discussed the status of the Pallid Sturgeon Process and work done since the September 2017 GC
129 workshop. Barels suggested that at the September 2018 GC meeting, the ED should go through the details
130 of the Pallid Sturgeon White Paper and provide a clear synopsis of where we are at. Additionally, the EDO
131 should also consider bringing Program hydrology back into the discussion and may need to look at things
132 other than connectivity. He also stated that the Program should be careful about bringing Missouri River
133 thinking to the Platte and find a way to fit into that pallid sturgeon work and not be consumed by it. Thabault
134 agreed and said the Program should find opportunities to leverage Missouri River work and partnerships to
135 the benefit of the Program. La said that when the GC talked about this again in September, the EDO should
136 provide some insight to the GC as to where things stand with the other two objectives identified by the GC
137 as priorities during the September 2017 workshop. Farnsworth said the objective for the EDO white paper
138 on pallid sturgeon was to look into the Extension and how the Program might spend money and resources
139 to get answers to questions important to the Program. Smith said the EDO will be working with Compass
140 during the summer to do more strategic thinking about next steps with pallid sturgeon and will come back
141 to the GC at the September meeting with a more robust discussion.



142 **PRRIP Water Action Plan (WAP) Projects**

143 Farnsworth led a discussion of the status of WAP projects. Brown said it might be helpful to add some
144 clarifying language from the Extension document that specifies the goal of reaching 120,000 acre-feet as
145 early as possible during the Extension.

146

147 *Cottonwood Ranch (CWR) Broad-Scale Recharge (BSR)*

148 Werbylo gave a presentation on the status of the CWR BSR.

149

150 *CNPPID Water Service Agreement (WSA)*

151 Farnsworth discussed the Water Service Agreement with CNPPID for water delivery to this project. Kraus
152 said after reviewing the NPPD agreement for land use, he now has questions about what is going on with
153 assignment of the project if the Program goes away. The main concern is what happens if no Program
154 signatory accepts assignment of the project. Barels said if edits are made to this section in the CNPPID
155 agreement, then that changes the NPPD agreement. LaBonde asked about Exhibit F and priorities for excess
156 flow. Within the body of the agreement it says Central may enter into agreements for additional uses of
157 excess water, which will diminish the availability of Program sharing. Maybe future excess contracts should
158 be noted as taking a lower priority to satisfy contracts that are already in place. LaBonde said this agreement
159 should include language anticipating future extensions because the facilities we are building will have
160 lifespans of 50 years or more and the Program will extend beyond 2032. LaBonde suggested adding
161 language that specifies the agreement may be modified by up to three, 13-year extensions. Freeman said
162 we could consider language that says the agreement is subject to any possible extensions or adjustments to
163 the existing FERC license.

164

165 *Cottonwood Ranch Land Use Agreement*

166 Farnsworth discussed the Land Use Agreement with NPPD for the CWR BSR project. Farnsworth agreed
167 to work with NPPD and CNPPID to draft termination and extension language for both agreements that will
168 be discussed with the GC via a conference call.

169

170 *Slurry Wall Project*

171 Werbylo gave an update on the Lakeside Slurry Wall project. Wilson and Stine from JEO gave a
172 presentation on project design. Rabbe asked how much water can be added to the river at one time from
173 this project. Werbylo said 50 cfs for roughly two weeks. Strauch asked if we can start construction before
174 the miner gets to the full western end of the pit. Werbylo said if he continues to mine he could be on site
175 another 2-3 years.

176

177 **Meeting adjourned at 5:46 PM Mountain Time.**



WEDNESDAY, JUNE 13, 2018

Welcome and Administrative

Fassett called the meeting to order at 8:00 AM Mountain Time and the group proceeded with introductions.

PRRIP WAP Projects Update

North Platte Choke Point

Farnsworth updated the group on the status of work at the North Platte choke point. Miller suggested the EDO discuss options for the choke point with the North Platte City Administrator and have him attend the September GC meeting for the more detailed discussion with the GC on this issue. Urie asked if the road bridge is a key issue restricting flow. Farnsworth said it is more of a conveyance/capacity issue due to channel aggradation. Miller said there are some people in the area that believe the bridge is the key issue. Urie said he wonders if we need to consider helping to rebuild the bridge which might help with capacity and sediment transport. Miller and Farnsworth said it does not seem as though the bridge is the key issue. Strauch asked if we would have to get all landowners to agree to flood easements or buyouts. Farnsworth said yes and that will be the challenge. Freeman said she appreciates the effort on this because it is so important in terms of the Program efficiently using water. We need a continued, deeper drill-down on this issue in the near future. Taddicken agreed. La asked if the new berm will wash out under a 100-year flood and if the permit allows that berm to be re-built. Farnsworth said yes.

Scoring Subcommittee

Farnsworth said we have projects that are ready to be scored so the GC needs to review the roster and update the subcommittee membership to help with that process. Farnsworth asked the GC to send him names for an updated list by the end of next week. LaBonde asked if there is structure to that committee in terms of membership and operation. Griebing said it was a mix of technical representatives to help with the process of detailing proposed project scores.

Lakeside Slurry Wall Project

Farnsworth asked for guidance from the GC regarding the next steps with this project and whether to move to full design. There appears to be only one other potential option for another similar project during the Extension (Stall property north of current proposed project). Werbylo and Farnsworth said that would mean with this concept, at the end of the Extension we might be looking at about 4,000 acre-feet at a cost of roughly \$16 million. One option would be to turn this property into the last tern and plover OCSW habitat site and re-task JEO to design recapture well networks for CWR BSR and possibly Elwood recharge. Rabbe asked how much controllable water releases the Program would get out of the recapture well networks. Werbylo said probably in the ballpark of 10 cfs unless we build a larger network that might get us up to 40 cfs. Farnsworth said from a score perspective that would be about 4,000 cfs annually. Farnsworth said that one of the limitations we are running up against for slurry walls is capacity loss on projects due to spoil from the mining operation having to be dumped back into the pit. La asked if there are concerns whether keying into the caprock won't really work. Wilson said we believe it will work. Taddicken asked if the fact that the miner has mined to the south border of the property will raise project costs. Stine said we are prepared to deal with that problem, the presence of the county road will be helpful with that.

LaBonde said we have been talking about building one of these as a proof of concept and he encourages the group to move forward with this to see what we are dealing with. He encourages the GC to go forward with the final design. Hines said the Service would prefer to spend the money on the choke point and recapture wellfields. LaBonde said we should do the wellfields as well. Hines said the \$11 million price tag is high and it seems like it should be spent elsewhere. Taddicken said when the GC talked about the proof of concept idea we thought we might have several replicates. Now, it appears it is a lot of money for one



50 project and there may only be one other possible replicate. We have a lot of water in Lake McConaughy
51 that we can't use. Fassett said he is becoming more nervous about the level of expense for this project but
52 it is hard to take any option off the table. LaBonde said working at the choke point means more water from
53 the North Platte River and that water is going to become more expensive. Hines asked how much it would
54 take to get to final design. Werbylo said roughly \$300,000 in addition to the \$180,000 already spent. Barels
55 said he was thinking about the Program goals and what is in the Extension document. We still have the
56 water goal to achieve for the Extension and he is concerned dropping a project like this now reduces the
57 likelihood that we can achieve this goal. It seems like we don't have a choice but to move forward.
58 Farnsworth said if all these projects come on board we will just get over the 120,000 acre-foot goal.
59 Econopouly asked if we shelved the slurry wall money could we instead go back at look at some of the
60 more expensive projects that we bumped out by the slurry wall projects. Farnsworth said that would mean
61 re-looking at options like acquire and retire and mainly leasing water and moving it through Lake
62 McConaughy.

63
64 Berryman said if we build this and go into a Second Increment, costs will come down. Kraus said it would
65 give you better ideas for the Second Increment even if we don't get another one done during the Extension.
66 LaBonde said beyond proof of concept, this project would give us 9% of the water we are trying to achieve.
67 Mehling said leased water costs every year and won't always be available. Merrill said we should look at
68 dollars per acre-foot over the life of the project instead of just initial construction costs. Over 50 years, that
69 might bring the true cost of this water down to a level that is more financially palatable.

70
71 **GC Decision** – *LaBonde moved to authorize the EDO to move forward with the Lakeside Slurry Wall*
72 *Project into final design and construction; Berryman seconded.* Merrill said Reclamation and the Service
73 request this motion be tabled until the GC receives further information from the EDO and can discuss the
74 matter at the proposed July 2018 meeting in Denver to discuss the draft Extension biological opinion. The
75 GC agreed. Motion tabled.

76 77 **PRRIP Publications and Peer Review**

78 Smith and Farnsworth discussed recent and proposed PRRIP publications.

79
80 **GC Decision** – *Czaplewski moved to approve publication of three publications – whooping crane Chapter*
81 *4; whooping crane diurnal habitat selection; Sandhill crane use; Strauch seconded.* Publications approved.

82 83 **PRRIP Monitoring Update**

84 Baasch discussed the latest results of PRRIP whooping crane and tern/plover monitoring. Fassett said he
85 likes having this update at GC meetings.

86 87 **PRRIP Website and Database**

88 Farnsworth gave the GC an update on the status of the re-design of the PRRIP website and database.

89 90 **Platte River Recreational Access (PRRA) Program**

91 Rabbe discussed the PRRA Program and results of user surveys from this past season and recommendations
92 from the LAC for updating the Public Access Policy. Taddicken asked if the proposed changes needed to
93 be updated to say only one other person can access a property with a user to retrieve a deer, etc. Rabbe said
94 we should leave the language general in case it would take one or more people to help. Brown asked if we
95 needed to consider requiring written approval for this. Taddicken said it would be difficult to always get
96 written permission. Sackett said it will result in those people needing to get through the system which can
97 be a burden, it seems like the best approach is to leave discretion to NGPC. But, you do need to ask



98 permission of the NGPC. Urie suggested we keep it a verbal approval unless NGPC reports that this is
99 becoming problematic. Rabbe said NGPC is updating the website to provide a better user experience.

100
101 **GC Decision** – *Czaplewski moved to approve the following changes to the Public Access Policy; LaBonde*
102 *seconded. Motion approved.*

- 103 • *Reduce the total number of concurrent active reservations per user from five to three.*
- 104 • *Allow multiple youth to be added to the rifle deer season permit, with a maximum of one youth*
105 *allowed on-site at a time with the permitted adult.*
- 106 • *Enroll the Dippel tract into the PRRA for all uses. The area of access will be the same as the area*
107 *allowed by the Crane Trust for the Open Fields & Waters program, including river channel access.*
108 *Permit numbers for the Dippel site will be four for the rifle deer season and six for general use.*
- 109 • *Remove Area K and the south portion of Area I from the PRRA at the end of May 2018, pending*
110 *their sale by PRRIP. Area I will be reduced to five permits for general use and four for the rifle*
111 *deer season.*
- 112 • *Update the Public Access Policy to give NGPC the latitude to grant additional access to friends or*
113 *family of a permitted user, for the purposes of harvested game retrieval only and only during the*
114 *rifle deer season, on a by-request basis using their best judgment in the spirit of the PRRA program*
115 *and policy. Users must call NGPC’s PRRA representative to request this access. A statement will*
116 *be added to the permission slip notifying users of this policy.*

117 **Public Comment**

118 Fassett asked for public comment. None offered.

119 **Executive Session**

120
121 *Strauch moved to enter Executive Session; Taddicken seconded. GC entered Executive Session at 10:14*
122 **AM Mountain Time.**

123
124
125 *Ament moved to end Executive Session; Mehling seconded. GC ended Executive Session at 10:55 AM*
126 **Mountain Time.**

127 **Headwaters Conflict of Interest Policy**

128 Farnsworth discussed the outline of a Conflict of Interest Policy related to Headwaters and work other than
129 serving as the EDO for the Program. Headwaters is focused on being independent “honest brokers” for the
130 Program and takes very seriously any conflicts of interest or even perceptions of conflict of interest. It
131 would be helpful if Headwaters had input from the GC as to how best to navigate situations if we are
132 approached to do work or team on work. Hines said most of the issues relate to when a regulatory action is
133 related to the Program. Farnsworth said we also know there are perception issues related to non-Program
134 regulatory actions. Fassett said maybe Headwaters could come to a small committee of the GC to discuss
135 issues when they arise. Freeman said it makes great sense to have a smaller group to help provide
136 Headwaters with additional helpful input. Urie said maybe the Signatories would work best as that group.
137 Farnsworth agreed that is how Headwaters would proceed.

138 **Future Meetings & Closing Business**

139
140 Upcoming 2018 GC meetings:

- 141 ○ GC Special Session (draft Extension biological opinion) – July or August 2018
- 142 ○ GC Quarterly Meeting – **September 11-12, 2018 @ Kearney, NE**
- 143 ○ 2017 AMP Reporting Session – **October 16-18, 2018 @ Omaha, NE**
- 144



- 145 ○ GC Special Session (FY19 Budget/Work Plan) – **November 13, 2018** (conference call/webinar
146 only)
- 147 ○ GC Quarterly Meeting – **December 4-5, 2018** @ Denver, CO
- 148

149 **Meeting adjourned at 10:07 AM Mountain Time.**

150
151 **Summary of Action Items/Decisions from June 12-13, 2018 GC Quarterly Meeting**

- 152 1) Approved the following GC minutes:
- 153 ● March 13-14, 2018 GC Quarterly Meeting, as amended by the State of Colorado.
 - 154 ● April 20, 2018 GC Executive Session Conference Call.
 - 155 ● April 30, 2018 GC Executive Session Conference Call.
 - 156 ● May 29, 2018 GC Executive Session Conference Call.
- 157 2) Tabled the following motion for discussion at the proposed July 2018 GC meeting – *To authorize the*
158 *EDO to move forward with the Lakeside Slurry Wall Project into final design and construction.*
- 159 3) Approve publication of three publications – whooping crane Chapter 4; whooping crane diurnal habitat
160 selection; and Sandhill crane use.
- 161 4) Approved the following changes to the Public Access Policy:
- 162 ● Reduce the total number of concurrent active reservations per user from five to three.
 - 163 ● Allow multiple youth to be added to the rifle deer season permit, with a maximum of one youth
164 allowed on-site at a time with the permitted adult.
 - 165 ● Enroll the Dippel tract into the PRRA for all uses. The area of access will be the same as the area
166 allowed by the Crane Trust for the Open Fields & Waters program, including river channel access.
167 Permit numbers for the Dippel site will be four for the rifle deer season and six for general use.
 - 168 ● Remove Area K and the south portion of Area I from the PRRA at the end of May 2018, pending
169 their sale by PRRIP. Area I will be reduced to five permits for general use and four for the rifle
170 deer season.
 - 171 ● Update the Public Access Policy to give NGPC the latitude to grant additional access to friends or
172 family of a permitted user, for the purposes of harvested game retrieval only and only during the
173 rifle deer season, on a by-request basis using their best judgment in the spirit of the PRRA program
174 and policy. Users must call NGPC’s PRRA representative to request this access. A statement will
175 be added to the permission slip notifying users of this policy.