

1 **Bugs Pay for Days of Steady Reservoir Releases to Reduce Hydropeaking-**

2 **Ecosystem Conflict**

3 **Short title:** Reduce Hydropeaking-Ecosystem Conflict

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13 **Abstract**

14 Steady low reservoir releases increase downstream primary and aquatic invertebrate (bugs)
15 production. These releases also reduce hydropeaking value, raise costs for hydropower
16 customers, and reduce funds to maintain infrastructure and repay loans. This study quantifies the
17 win-lose tradeoff between hydropeaking value and days per month of steady low releases at Glen
18 Canyon Dam, Arizona. We estimate win-lose tradeoffs for monthly release volumes of 0.71 to
19 0.95 million acre-feet from March to October 2018 and 0 to 31 days. Conservative estimates
20 indicate that steady low releases on eight weekend days per summer month in 2018 reduced
21 monthly hydropeaking value by \$430,000 to \$850,000. We used results to design a financial
22 instrument that gives ecosystem managers a budget to choose days of steady low releases and
23 pay hydropower producers for lost value. One option to reduce costs is shifting days of steady

24 low releases to spring/fall months. Next steps include discussing the proposed instrument with
25 more U.S. Federal agencies, conducting more flow experiments, and monitoring how timing and
26 more steady low flow days per month affect bug production. Managers may extend to other
27 experimental releases that mobilize sediment, build sand bars, or disadvantage non-native fish.

28 **Keywords**

29 Aquatic invertebrates; Hydropower generation; Multi-objective optimization; Trade-off analysis.

30 **Graphical Abstract**

Engaged: • Ecologists. • Hydropower managers.

Release Decisions by:

- **Period:** On- & off-peak.
- **Month:** March to October.
- **Day-type:** Weekday, Saturday, & Sunday.

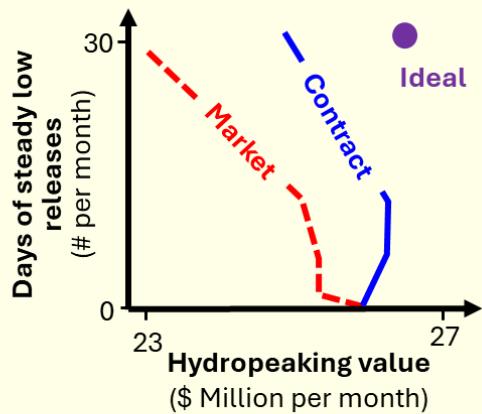
Objectives - Maximize:

1. Hydropeaking value.
2. Days per month of steady, low releases (Bug flows).

Key Constraints:

- **Physical:** Mass balance, Storage within capacity, Release within powerplant capacity.
- **Management:** Preserve monthly release volume, Limit change in release per day and per period.
- **Prices:** Contract & market.

Generate Tradeoffs:



Reduce Conflict:

1. **Estimate costs** of bug flows on weekends in summer months.
2. **Give ecologists a budget** to choose days and compensate hydropower producers for lost value.
3. **Switch** bug flows to lower cost **spring/fall months**.

32 ***Highlights***

- 33 • Steady low reservoir releases increase primary and aquatic bug production, decrease
34 hydropeaking value, and lower funds to maintain infrastructure (win-lose conflict).
- 35 • Federal and state agencies can give ecosystem managers a budget to choose the number
36 and timing of steady low releases and pay hydropower producers for lost value (win-win
37 scenario).
- 38 • One promising new experiment is shifting steady low releases from summer to spring/fall
39 months.

40 1. Introduction

41 Hydropeaking operations ramp up reservoir releases during the daytime and reduce nighttime
42 releases to follow energy demands, increase hydropower value, and meet customer contracts.
43 These operations also disadvantage downstream ecosystems (Bunn and Arthington, 2002;
44 Liermann et al., 2012; Moog, 1993; Poff et al., 2007; Poff and Zimmerman, 2010; Vörösmarty et
45 al., 2010; Winemiller et al., 2016). Researchers are challenged to quantify hydropower-
46 ecosystem tradeoffs, transform win-lose tradeoffs into wins, and help reduce conflict.

47 Multi-objective optimization methods are well established to quantify water supply, hydropower,
48 ecosystem, and other tradeoffs (Porse et al., 2015; Wheeler et al., 2018; Wild et al., 2019).
49 Numerous methods and metrics exist to estimate ecosystem impacts (Alafifi and Rosenberg,
50 2020; Chen and Olden, 2017; Hauer et al., 2018; Horne et al., 2016; Kraft et al., 2019;
51 Rheinheimer et al., 2015). Jager and Smith (2008) suggest segmenting release regimes into
52 different time periods at the annual, seasonal, or daily scale to benefit hydropower and ecosystem
53 objectives. Daily hydropeaking creates distinct periods of high and low flow. This differentiation

54 disadvantages taxa such as aquatic invertebrates that can only tolerate a narrow range of abiotic
55 conditions. For example, Kennedy et al., (2016) identified a strong negative correlation between
56 hydropeaking operations and insect (bug) diversity below Glen Canyon Dam, Arizona, and 15
57 other large reservoirs across the western U.S.

58 Several factors affect the ability to turn win-lose tradeoffs into wins. First, it is harder to find
59 wins as the number of objectives increases (Hegwood et al., 2022). Tradeoffs are also more
60 difficult to visualize as the number of objectives increases (Bonham et al., 2022; Rosenberg,
61 2015). Second, regions along concave tradeoff curves with maximum curvature or bulges (knee
62 points) may identify promising areas for compromise (Null et al., 2021). Third, the degree of
63 collaboration between researchers and system managers affects actionability. For example,
64 Horne et al., (2016) found low implementation in their review of 42 ecosystem optimization
65 studies because researchers did not follow the best practices of participatory modeling
66 (Langsdale et al., 2013; Voinov et al., 2016). Fourth, physical and environmental systems are
67 challenging to model, and managers rely on their experience rather than prescriptive solutions
68 from optimization models (Horne et al., 2016). Fifth, successful implementation requires
69 experimentation in concert with political and legislative support (Owusu et al.,
70 2022). Hydropower-ecosystem conflicts are also more than numbers. Conflicts consume
71 managers' time and increase their work stress and anxiety (Unterhitzenberger et al., 2021).

72 This paper has goals to reduce a hydropeaking-ecosystem conflict by a) quantifying tradeoffs, b)
73 developing a financial tool that gives ecologists more flexibility to schedule days of steady low
74 flows that advantage bugs (bug flows), c) paying hydropower producers for lost value, and d)
75 using the financial tool to suggest new experimental steady low flows to reduce lost
76 hydropeaking value. We answer four questions:

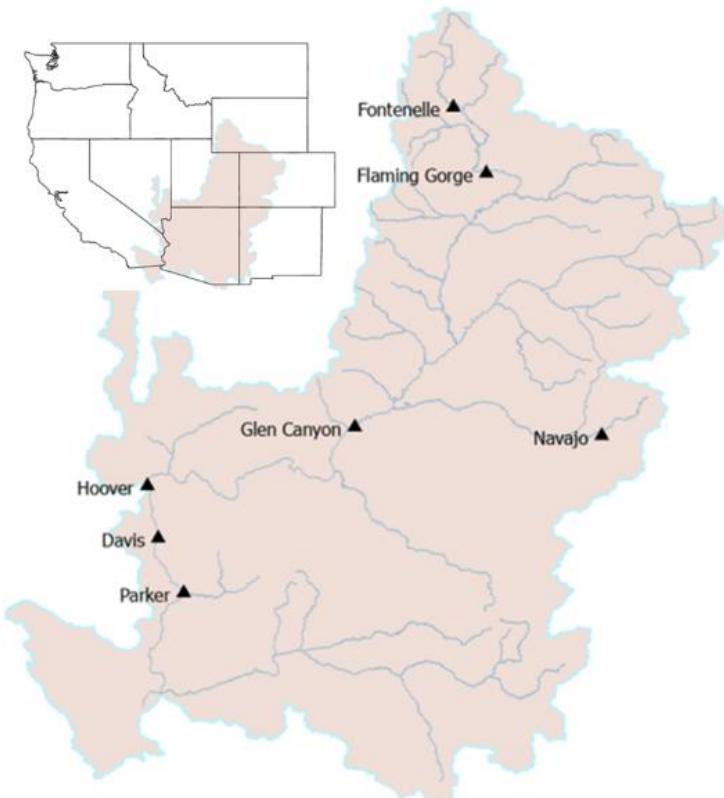
- 77 a) How is monthly hydropeaking value impacted by the number of consecutive days of
78 steady low releases on Sundays, Saturdays, and weekdays?
- 79 b) How do the shape and position of tradeoff curves vary with different monthly release
80 volumes and contract and market energy prices across March to October months
81 when bugs are most productive?
- 82 c) How to use answers to questions (a) and (b) to design a financial instrument that
83 gives ecosystem managers more flexibility to schedule bug flows and compensate
84 hydropower producers for lost value?
- 85 d) How to use the instrument to suggest new experiments to reduce the costs of bug
86 flows?

87 We used the example of Glen Canyon Dam/Lake Powell, Colorado River, U.S. Experimental
88 bug flows were conducted every weekend from May to August in 2018, 2019, 2020, and 2022.
89 Future iterations are under review (USBR, 2024a). The experimental flows yielded promising
90 results, with significant increases in midge (*Chironomidae*; 80%) and caddisfly (*Trichoptera*;
91 120%) populations in 2022. Conversely, a 50% decline in midges was observed in 2021 without
92 the experiment, while caddisfly abundance remained stable (CRB California, 2023). A technical
93 report from the Glen Canyon Dam Long-Term Experimental and Management Plan (LTEMP)
94 team also reported positive effects of experimental flows on bug populations, native fish
95 numbers, and angler catch rates (LTEMP Team, 2022). The report additionally outlined the
96 annual costs of the experimental flows and the Western Area Power Administration's (WAPA)
97 growing financial concerns, which threaten the sustainability of experimental bug flows. Our
98 work explores alternative operations to offset experimental costs while giving ecosystem
99 managers more flexibility to schedule the timing and number of days of steady low releases.

100 The next section details the hydrologic, ecological, and institutional context of Glen Canyon
101 Dam operations. Section 3 presents the materials and methods, including our engagement
102 strategy with hydropower and ecosystem managers and the optimization model designed to
103 maximize both hydropeaking value and consecutive days of steady low releases. The results
104 section includes model validation and an analysis of trade-offs under various release volumes
105 and pricing scenarios. Section 5 introduces a new financial tool to reduce WAPA's burden from
106 experimental bug flows. The section also suggests new experimental releases to alter the timing
107 of bug flows to reduce lost hydropeaking value. The discussion section relates our findings to
108 prior research, shares additional considerations to implement more flexible operations, and
109 suggests future directions. The conclusion summarizes the key findings.

110 2. Study Area: Hydrologic, Ecological, and Institutional Context

111 Lake Powell is the second largest reservoir by storage volume (~25 million acre-feet) in the U.S.
112 (Root and Jones, 2022). Water from Wyoming, Colorado, Utah, New Mexico, and Arizona feeds
113 into Lake Powell, formed by the Glen Canyon Dam, built in 1963 (Figure 1). Closure of Glen
114 Canyon Dam significantly altered river flow, temperature, and sediment delivery (Gloss et al.,
115 2005). The flow regime of the Colorado River from Glen Canyon Dam through the Grand
116 Canyon to Lake Mead shifted from pre-dam seasonal variability to daily fluctuations driven by
117 hydropeaking operations that follow energy demands (Topping et al., 2003). Post-dam releases
118 primarily from the hypolimnion led to constant year-round river temperatures, eliminating
119 natural seasonal variability (Wright et al., 2009). The shift altered the native ecosystem and
120 promoted the establishment of non-native fish species (Cross et al., 2011). More recently,
121 penstock releases have pulled from the warmer epilimnion to the benefit of small mouth bass
122 (*Micropterus dolomieu*) downstream and the detriment of native humpback chub (*Gila cypha*).



123

124 **Figure 1.** Location of Glen Canyon dam within the Colorado River Basin. Adapted from
125 (Abernethy et al., 2021).

126 Glen Canyon Dam's hydropeaking operations provide low-cost energy to rural customers in
127 seven Western U.S. states: Wyoming, Utah, Colorado, New Mexico, Arizona, Nevada, and
128 Nebraska (USBR, 2023). These operations also impact riverbeds, water clarity, and ecosystem
129 functioning (Deemer et al., 2022). Releases from the dam's cold hypolimnion maintain low
130 downstream water temperatures, particularly in areas without tributary inflows (Cross et al.,
131 2011). High flows entrain sediments (Vericat et al., 2020). Low flows expose aquatic life along
132 the river's edge to desiccation (Angradi and Kubly, 1993; Kennedy et al., 2016; Young et al., 2011).
133 Hydropeaking also erodes sandbars (Alvarez and Schmeeckle, 2013), which are vital habitats for
134 aquatic vegetation and campsites for the Grand Canyon's multi-million dollar rafting industry
135 (Hoeting, 1998; USGS, 2015).

136 The Colorado River ecosystem in the Grand Canyon is food-limited (Cross et al., 2013, 2011;
137 Hall Jr. et al., 2015; Kennedy et al., 2016, 2023). At the base, gross primary producers (algae)
138 harvest solar energy. The primary producers are food for aquatic invertebrates such as stoneflies
139 (*Plecoptera*), mayflies (*Ephemeroptera*), caddisflies, and midges. These bugs are also the food
140 for threatened and endangered fish species like the humpback chub, razorback sucker
141 (*Xyrauchen texanus*), bluehead sucker (*Catostomus discobolus*), Colorado pikeminnow
142 (*Ptychocheilus lucius*), roundtail chub (*Gila robusta*), and bonytail (*Gila elegans*). Turbidity,
143 canyon shading, and high river stage reduce light penetration and limit primary production. The
144 disturbance of aquatic vegetation and drying of river edges following high flows also desiccate
145 the eggs that bugs lay at or near the water surface (Kennedy et al., 2016).

146 The annual Lake Powell release is set in the fall of each year with goals to equalize storage in
147 Lake Powell and Lake Mead, better balance storage in the two reservoirs, meet a minimum
148 objective release of 8.23 million acre-feet per year as a delivery requirement to California,
149 Nevada, Arizona, and Mexico, and protect Lake Powell elevation 3,525 feet —1.8 million acre-
150 feet above the minimum power pool elevation of 3,490 feet and 5.5 million acre-feet above the
151 low-level outlets [dead pool] at 3,370 feet (Root and Jones, 2022; USBR, 2019, 2007). The
152 release may be updated in the spring in response to changing reservoir levels. Recent
153 conversations for new reservoir operations post-2026 propose to lower the minimum release to
154 6.0 million acre-feet per year when reservoir storage is low (Buschatzke et al., 2024). Once the
155 annual release is set, monthly release volumes are set to maximize hydropower value in high
156 load months of January, February, March, June, July, and August. Daily hydropeaking
157 operations are subject to constraints on minimum release, maximum release, and rate of change
158 in releases.

159 Research across many locations worldwide has increasingly recognized the role of steady daily,
160 weekly, or monthly reservoir releases in enhancing river morphology, protecting native fish
161 populations, and restoring biotic and abiotic components of aquatic ecosystems, including
162 aquatic invertebrates (Beechie et al., 2010; Kennedy et al., 2016; Koehn et al., 2019; Nilsson and
163 Berggren, 2000; Palmer and Ruhi, 2019; Reid et al., 2019; Richter and Thomas, 2007;
164 Stromberg, 2001; Stromberg et al., 2007). For example, Li et al, (2022) provided an extensive
165 overview of ecological restoration techniques, among which steady flows were included.
166 Evidence also suggests that steady flows enhance recreational activities by improving conditions
167 and perceived safety (Getzner, 2015). Overall, existing research supports steady low flows for
168 their broad ecological and recreational benefits beyond enhancing the abundance and diversity of
169 aquatic invertebrate populations.

170 In the 1990s, managers started experimental releases from Glen Canyon Dam above turbine
171 capacity for several days in some years to gain downstream ecological benefits by replicating
172 some of the pre-dam high flood flows. These experimental releases, known as “High Flow
173 Experiments (HFEs),” were designed to generate flood flows, mobilize sediment, and rebuild
174 downstream sandbars (Cross et al., 2011; Robinson and Uehlinger, 2008). During months of
175 HFEs, the monthly release volume was maintained, leading to reduced hydropower releases on
176 days outside HFE periods. Overall, HFEs prioritized downstream ecological and recreational
177 benefits at the expense of some hydropower value (Melis, 2011).

178 As part of the preferred alternative for the 2016 Glen Canyon Dam Adaptive Management
179 Program (GCDAMP), managers also started experimental steady low releases on weekends in
180 summer months to increase macroinvertebrate production—bug flows (USBR, 2016). These
181 flows aimed to keep bug eggs wet, increase bug production, and diversify species. Weekends

182 were selected for their comparatively lower energy demands and hydropeaking value than
183 weekdays (Førsund, 2015; USBR, 2023). The volume of water saved on the weekends due to
184 steady low bug flows was redistributed to on- and off-peak weekday releases to preserve the
185 required monthly release volume. The flows supported the LTEMP resource goal for natural
186 processes to “restore, to the extent practicable, ecological patterns and processes within their
187 range of natural variability, including the natural abundance, diversity, and genetic and
188 ecological integrity of the plant and animal species native to those ecosystems” (DOI, 2016).

189 Analysis of bug abundance data after experimental bug flows in summer 2018 and 2019 showed
190 increased invertebrate production and diversity (Kennedy et al., 2023). Recent modeling work
191 also suggested a second mechanism by which steady low flows may increase bug production
192 (Cross et al., 2013; Deemer et al., 2022; Hall Jr. et al., 2015). In this second mechanism, steady
193 low flows reduce downstream turbidity and lower water stage. Less turbidity and lower stage
194 allow more sunlight to penetrate the water column and increase algae growth. More algae growth
195 means more food for aquatic invertebrates. The same work also suggested that adding days and
196 months of steady low flows in spring and fall may increase gross primary production (Deemer et
197 al., 2022; Palmer and Ruhi, 2019). The modeling of flannelmouth sucker (*Catostomus latipinnis*)
198 further suggested increased growth in spring and summer that has approximately the same effect
199 as a warmer river by 1 to 2°C (Hansen et al., 2023). Unpublished data also suggest that steady
200 low flows may benefit aquatic invertebrate larvae at multiple life stages, including growth of
201 small larvae in fall months and larger larvae right before they emerge in spring months
202 (Kennedy, personal communication, 2024). Finally, current hydropeaking results in daily
203 fluctuations in flow that are 5 standard deviations from the mean (Palmquist et al., 2024). More

204 days of steady low flows can reduce deviations towards something closer to natural flow
205 variations.

206 The ecological gains of the bug flow experiments came with hydropower revenue losses,
207 estimated at \$165,000 from the 2018 and \$327,000 from the 2019 Bug Flow Experiments, or
208 approximately 1% of monthly hydropower value (Ploussard and Veselka, 2019; 2020). A
209 financial analysis of the 2018 experiment highlighted the importance of timing (i.e. months of
210 the year) in managing costs (Ploussard and Veselka, 2019). May and June, with lower energy
211 prices, resulted in increased total revenue, while July and August, with higher prices, saw losses.
212 These findings suggest that adjusting the experiment's timing could help offset hydropower
213 losses.

214 While impacts on hydropeaking value are small, there is concern because the adaptive
215 management program uses hydropower revenues to pay for bug and other experimental releases.
216 The bug flow experiment design creates a negative feedback loop that exacerbates conflict
217 between hydropeaking and ecosystem operations. Bug and other experimental releases mean less
218 revenue is available to maintain project infrastructure, repay project loans to the federal treasury,
219 and fund additional experimental flows. Additionally, hydropower managers must purchase
220 additional energy on the open market to fulfill low-price delivery contracts during high-load
221 periods on weekends. Those costs are only partially offset by larger releases during high load
222 periods on weekdays to preserve monthly release targets and comply with ramp rate constraints
223 and measurable hourly energy demands.

224 Next, we describe an engagement process with managers that allowed us to formulate an
225 optimization model to quantify tradeoffs between hydropeaking value and days of steady
226 releases that increase bug production and diversity.

227 3. Materials and Methods

228 3.1 Engagement

229 We set out to quantify tradeoffs between hydropeaking operations and experimental steady low
230 releases that advantage bugs. We had multiple interactions with WAPA (hydropower) and Grand
231 Canyon Monitoring and Research Center (GCMRC, ecosystem) managers and scientists.
232 Managers explained Glen Canyon Dam's prominent role in regional low-cost energy delivery,
233 load balancing, and spinning reserves. Managers told us to focus on hydropeaking (load
234 following) value and ignore load balancing and spinning reserve. Our interactions guided the
235 definition of a hydropower objective to maximize hydropeaking value. Our interactions also
236 pointed us to the literature that supports an ecosystem objective to increase the number of
237 consecutive days per month of steady low releases and possibly shift days of steady low releases
238 to spring/fall months (Deemer et al., 2022; Hall Jr. et al., 2015; Hansen et al., 2023; Kennedy et
239 al., 2023; Palmquist et al., 2024). Managers explained how bug flows are funded and pointed us
240 to the grey literature that described operational constraints and showed that bug flow
241 experiments increased bug production and diversity (Kennedy et al., 2023; Ploussard and
242 Veselka, 2020, 2019; USBR, 2016). To represent sub-daily variations, managers suggested that
243 we turn 24-hourly decisions for releases into 2 periods per day—on-peak and off-peak. This
244 suggestion is supported by hourly release hydrographs (Figure 2), energy price data, and our
245 subsequent model validation (see section 4.1). Managers also shared relevant data to populate the
246 model, such as hourly energy prices by month and a conversion factor that represents energy

247 generation per 1 cfs of release [MW-hr per cfs]. The conversion factor assumed a near-constant
248 operating head, static turbine efficiency, and static generation efficiency. All the above
249 interactions followed best practices of collaborative modeling (Bourget et al., 2013; Langsdale et
250 al., 2013; Palmer et al., 2013; Voinov et al., 2016)—particularly engaging parties early and
251 identifying interests before discussing alternatives.

252 3.2 Hydropeaking objective

253 Typically, a hydropeaking objective to maximize value is a non-linear function that depends on
254 the power generation release, the elevation difference between the reservoir water surface and
255 tailwater, turbine efficiency, energy price, and release in relation to design efficiencies (e.g.,
256 Hochbaum, 2007; Ko et al., 1992; Tilmant et al., 2002; Yakowitz, 1982). This relationship can
257 be linearized for reservoirs with large storage volumes such as Lake Powell where daily, weekly,
258 or monthly release volumes draw down the reservoir water surface elevation a small amount
259 relative to the operating head (Pérez-Díaz et al., 2010; Wang et al., 2015; Yoo, 2009). Lake
260 Powell's monthly elevation data (USBR, 2024b) shows minimal change relative to the tailwater
261 elevation. This observation supports the assumption of a static reservoir elevation. We set the
262 hydropower objective to maximize hydropeaking value, calculated by multiplying optimal
263 turbine release with static head, turbine and generation efficiency, and energy price.

264 3.3 Ecosystem objective

265 Similarly, ecosystem objectives such as maximizing suitable habitat area and/or quality are non-
266 linear functions that transition from unsuitable (e.g., 0) to suitable (e.g., 1) over a small range of
267 a causal variable such as flow, water depth, or temperature (Alafifi and Rosenberg, 2020;
268 Alminagorta et al., 2016). Discussions with GCMRC managers helped us see that primary

269 production, bug abundance, and diversity increase proportionally to the number of consecutive
270 days per month of steady low flows. For example, a week with steady low flow days on
271 Saturday, Sunday, Monday, and Tuesday is preferable to Saturday, Sunday, Tuesday,
272 and Thursday even though both week types have the same hydropeaking value.

273 3.4 Sub-problems

274 The annual Glen Canyon dam release for water supply and nested monthly release volumes for
275 hydropower generation allowed us to break an inter-annual and annual multi-objective problem
276 into monthly sub-problems. Each monthly sub-problem was defined by four parameters: monthly
277 release volume, starting reservoir elevation, contract energy prices, and market energy prices.
278 We could change any of the four parameters to represent any month of any year.

279 We further broke each monthly sub-problem into two weekly release patterns. The first weekly
280 pattern—*steady low flow*—had 1 to 7 days of steady low flows on consecutive days. All
281 remaining days of the week followed daily hydropeaking operations. In the second weekly flow
282 pattern—*hydropeaking*—all days followed a hydropeaking schedule. We delineated 3 day
283 types—Sundays, Saturdays, and weekdays—by analyzing hourly flows observed at Lees Ferry
284 gauge (station id: USGS 09380000) for months with (e.g., August 2018) and without (e.g.,
285 August 2016) weekend steady low flows (Figure 2, blue line). Each day type had separate on-
286 peak energy prices. The 2 weekly patterns and 3 day types allowed us to represent any number of
287 days of steady low flows from 0 to 31 days per month. For instance, in a month with 10 steady
288 low-flow days (e.g., August, starting on a Monday), the model places the first 4 steady days on
289 Sundays where contract energy prices are low. The model places the next 4 days of steady flow
290 on Saturdays, and the remaining 2 days on Mondays. In a month with 13 days of steady low
291 flows, 4 Sundays, 4 Saturdays, 4 Mondays, and 1 Tuesday will be steady low releases while all

292 other weekdays will be hydropeaking. In contrast, a month with zero steady low flow days
293 means the model will decide releases for all weekends and weekdays with the flow pattern
294 *hydropeaking*.

295 Within each day type, we divided daily releases into 2 time periods per day. The off-peak period
296 had a single release value, low energy price, and duration of 8 hours from midnight to 8 a.m.
297 (pLow). The on-peak period had a different release value, higher energy price, and a duration of
298 16 hours from 8 a.m. to midnight (pHigh; Figure 2, red line; Palmer, personal communication,
299 2019). On each day of steady low flow, the on- and off-peak releases had the same steady low
300 release value. A release offset further defined the difference in flow between the release on a day
301 of steady low flow and the next off-peak release on the next day with hydropeaking. We also
302 explored a different number of periods per day, i.e., 3 and 4, and period lengths. We found
303 monthly release volumes were identical and estimates of hydropower generation from 2 periods
304 per day closely approximated actual hydropower generation. More specifically, the area under
305 the hydrographs for the observed and modeled Sunday-Saturday-Weekend flow patterns were
306 the same even though the traces do not overlay (Figure 2). Monthly hydropeaking value
307 calculated at an hourly time step was 1.5 to 2.2% less than value modeled with 2 time periods per
308 day (supplementary, Table S1).

309 3.5 Decision Variables

310 The annual, monthly, weekly, daily, and on- and off-peak sub-problems allowed us to model
311 monthly operation—744 hourly decisions per month—with 12 characteristic flow decisions per
312 month: 2 weekly flow patterns ($f \in [\text{hydropeak}, \text{steady}]$), 3 day types ($d \in [\text{Saturday}, \text{Sunday}, \text{and } \text{Weekday}]$), and 2 periods per day ($p \in [p\text{High}, p\text{Low}]$). The August energy pricing data
313 (Supplementary, Figure S1) also showed 2 periods per day. Thus, our model setup allowed us to

315 include week-to-week, day-to-day, and within day variations while keeping the computation
316 burden low.

317 3.6 Objective Functions

318 The equation to model monthly hydropeaking value [\$ per month] was:

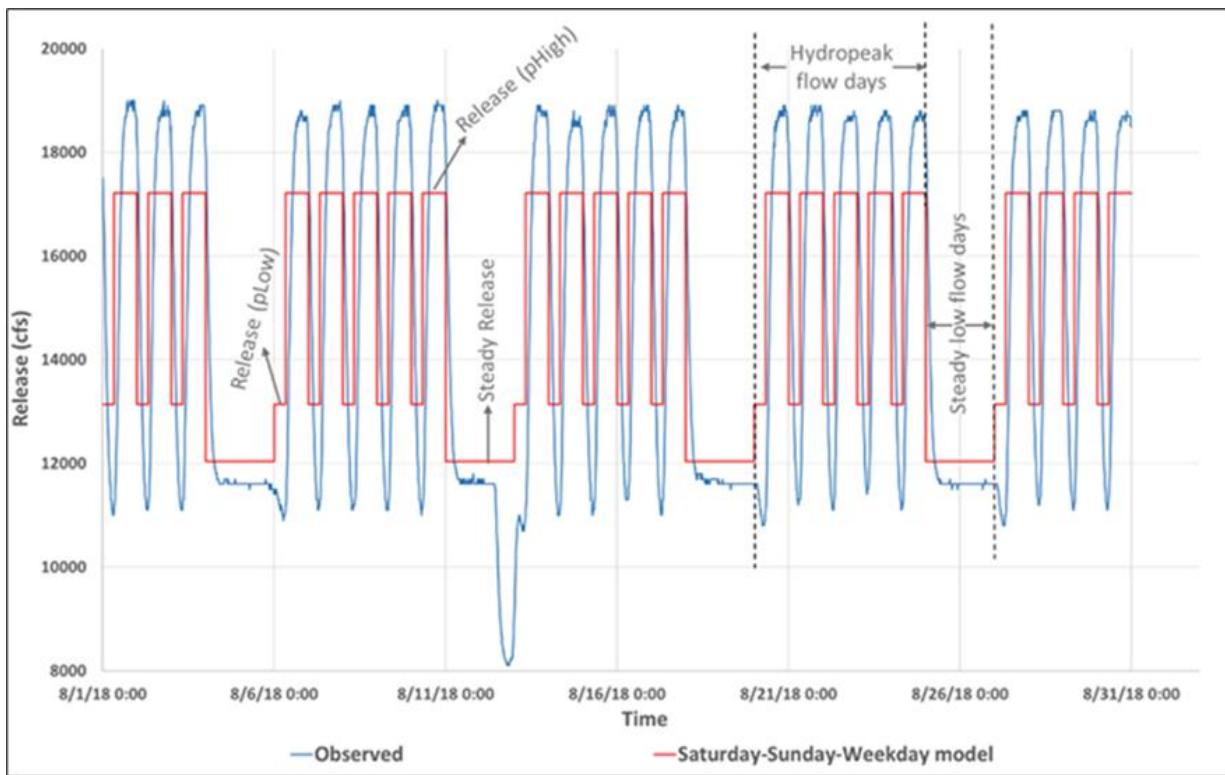
319
$$\text{Hydropeaking Value} = \sum_{f,d,p} \text{Price}_{d,p} \times \text{Release}_{f,d,p} \times \text{Duration}_p \times \text{NumDays}_{f,d} \times 0.0375$$

320 (eq. 1)

321 Where $\text{Price}_{d,p}$ is the energy price on day type d in period p [\$ per MW-hr]; $\text{Release}_{f,d,p}$ is the
322 release for the flow pattern f , on day type d , in period p [cfs]; Duration_p is the duration of
323 period p [hours]; $\text{NumDays}_{f,d}$ is the number of days per month for flowpattern f and day type d ;
324 and 0.03715 is a conversion factor that represents energy generation per 1 cfs of release [MW-hr
325 per cfs]. The conversion factor assumed a near-constant operating head, static turbine efficiency,
326 and static generation efficiency. A collaborating WAPA manager shared the parameter value
327 (Palmer, personal communication, 2019). This person suggested to use the same conversion
328 value for each month.

329 3.7 Constraints

330 Seven physical constraints limit releases within infrastructure capacities. Ten managerial
331 constraints specified the monthly release volume, limited the rate-of-change of releases during
332 successive peak- and off-peak energy demand periods, set the number of steady low flow days
333 per month, set releases for both periods to the low release on days of steady low flows,
334 established relationships between low releases on different day types, and included offset
335 releases. Additional details on the constraints are in the supplementary section, with the model
336 structure shown in Supplementary Figure S7.



337

338 **Figure 2.** Comparison between hourly hydrograph observed at Lees Ferry gauge during August
 339 2018 (blue) and the modeled hydrograph with 2 periods per day: pLow and pHigh (red).

340 3.8 Input Data

341 The principal input data comprised on- and off-peak energy prices, monthly release volume, and
 342 number of days of steady low releases per month. We specified contract and market energy
 343 prices. These prices were used in two model variants.

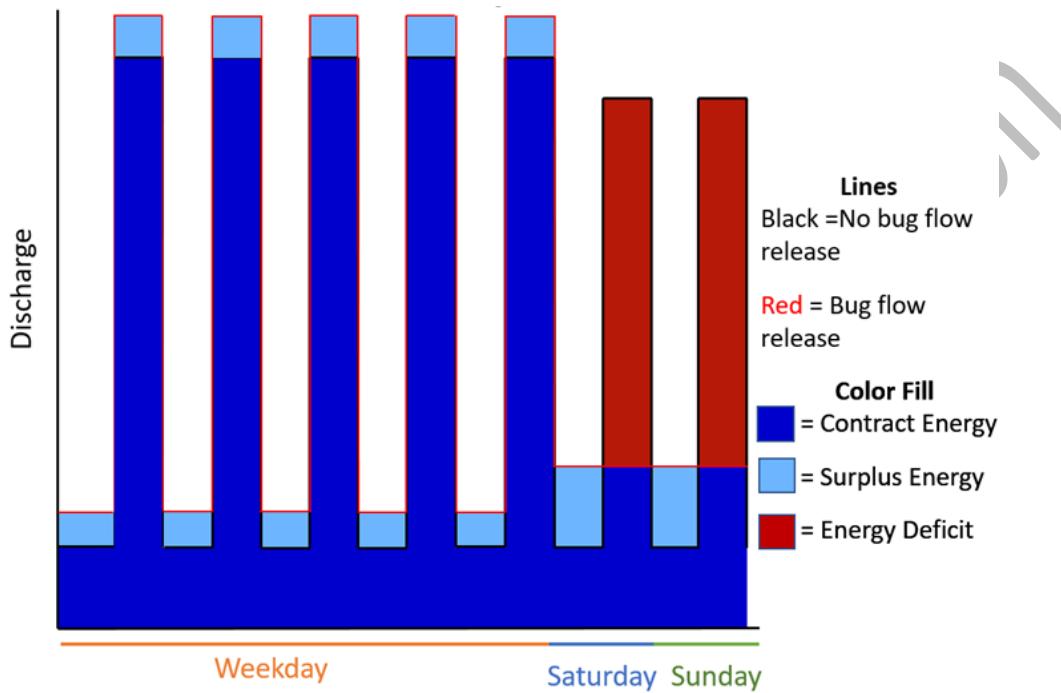
344 *Contract prices* – Hydropower operators contract with power companies and rural
 345 electric utilities at long-term, fixed energy prices that vary by month, day, and hour of the
 346 day. WAPA provided energy price data (Palmer, personal communication, 2019; also
 347 accessible at Rind and Rosenberg, 2025). Off-peak prices were flat for all March to
 348 October months we examined in this study, whereas hourly on-peak prices varied from
 349 \$40 to \$70/MWh (March, April, May, September, October) and \$50 to \$100/MWh

350 (August; Supplementary, Text S1). We transformed the hourly energy prices into average
351 contract prices for each modeled day type and period. As an example, the averaged
352 energy prices for off- and on-peak periods on a weekday in August were \$50/MWh and
353 \$79/MWh, respectively. Sunday peak- and off-peak prices were the same as those for the
354 weekday off-peak period. We did not know the contract energy price for on-peak
355 Saturday, so we averaged prices for on- and off-peak weekday periods, i.e., \$64/MWh.

356 *Market prices* – WAPA purchases electricity from private companies at a market rate and
357 sells the purchased energy at the lower contract price when demand exceeds energy
358 generation—either due to reduced generation from bug flow releases or power generation
359 disruptions such as from turbine or generator maintenance (Figure 3). Market prices may
360 also fluctuate due to exogenous factors such as regional demand surges, grid outages,
361 drought, or surplus generation from solar and wind. To assess the impact of changes in
362 market prices, we created scenarios where market prices increased \$30/MWh above the
363 average contract prices in all days and periods. For example, with August weekday
364 average on-peak contract prices around \$79/MWh, we added \$30/MWh, resulting in a
365 weekday average on-peak market price of \$110/MWh (Figure S1). For comparison,
366 weekday market prices may surge to \$300/MWh for a few hours a week in August or
367 September due to high load, drought, or other exogenous regional energy market
368 fluctuations—such as seen in a comparison dataset used to estimate the impacts of flows
369 to disrupt small mouth bass spawning (Figure S2; Lucas S Bair and Charles B Yackulic,
370 2024; Yackulic et al., 2024).

371 For market pricing, we compared modeled releases with observed releases (Figure 3). For
372 instance, if observed releases were higher than estimated, the resulting energy deficit was

373 purchased at the market price (Figure 3, red fill). Conversely, higher modeled than
374 observed releases created an energy surplus that was sold at the market price (Figure 3,
375 light blue fill).



376
377 **Figure 3.** Conceptual model that compares market pricing for a case with weekday hydropeaking
378 and steady low releases on the weekend (red line) to observed releases (black line). Dark blue-
379 filled areas indicate energy priced at the contract price. Light blue fill represents surplus energy
380 sold at the market price. Red fill shows energy deficits where energy is purchased at the market
381 price. Releases are not scaled.

382 3.9 Model Formulation

383 The model formulation includes decision variables, objective functions, and constraints
384 (Supplementary, Text S3). The model was implemented as a linear program in the General
385 Algebraic Modeling System (GAMS; Hozlar, 1990). Addition of market prices required a
386 different model setup called the Market-Contract price model.

387 We introduced a *Nobugflow_Rel_{d,p}* (cfs) parameter for observed hydrograph, i.e., pre-bug flow
388 releases from 2017, 2016, and 2015 (Supplementary, Fig. S4 to S6). The Market-Contract price
389 model had two further sub-models. First, releases for zero steady low flow days (i.e.,
390 hydropeaking pattern) were priced at contract rates (Figure 3, black line). Second, optimized
391 releases for the number of steady low flow days were compared to observed releases to
392 determine surplus or deficit energy generation. The differential energy is priced at market rate
393 (Figure 3, red line/light blue and red fill). Further details are provided in supplementary text S4.

394 3.10 Model Solution.

395 The bi-objective model used the constraint method to maximize hydropeaking value subject to
396 the number of days per month of steady low releases. We varied the number of days of steady
397 low releases from 0 to 31 days per month.

398 3.11 Scenarios.

399 The model was solved for scenarios of different monthly release volumes, price differential
400 between on and off-peak periods, contract and market energy prices, and flow offsets from
401 Sunday to weekday low flows during March to October months when aquatic invertebrates are
402 most productive. We varied the following parameters:

- 403 • Monthly release volume from 0.72 to 0.94 MAF that represent dry to wet conditions.
- 404 • Contract price differential, e.g., August weekday on-peak contract price was reduced from
405 \$79 (base case) to \$64.4 to \$49.7 per MWh.
- 406 • Static increase in market prices of \$30/MWh above the average contract price on all days
407 and all periods. This increase equaled or exceeded peak hourly prices in our pricing data.
408 The \$30/MWh increase also exceeded weekday, average on-peak prices in a comparison

409 dataset even when prices surged to \$300/MWh during a few hours per week (Figure S3;
410 Lucas S Bair and Charles B Yackulic, 2024; Yackulic et al., 2024).
411 • Offset release from 0 to 1000 cfs (H0 to H1000).

412 4. Results

413 4.1 Validation

414 The Saturday-Sunday-Weekday model releases and energy generation were validated for March
415 to October 2018 against 15-minute flow data at Lees Ferry (https://www.gcmrc.gov/discharge_qw_sediment/station/GCDAMP/09380000), aggregated hourly flows, and daily Glen Canyon
416 power plant energy generation (<https://www.usbr.gov/rsrvWater/HistoricalApp.html>)
417 (Supplementary, Table S1). For example, for August 2018 the flow volume for the observed,
418 hourly, and Saturday-Sunday-Weekday models were identical (e.g., Supplementary, Fig. S8).
419 Energy generation varied by only 4.2% in comparison to observed energy generation
420 (Supplementary, Table S1 and Supplementary, Fig. S9). The possible reasons for surplus energy
421 generation were an assumption that the reservoir head remains constant throughout the month
422 and an outdated conversion factor (Supplementary, eq. S1). Validation over different months of
423 2018 showed that the energy generation error varied from 2.8% (July) to 9% (October;
424 Supplementary, Table S1). Monthly hydropeaking value calculated at an hourly time step was
425 1.5 to 2.2% less than value modeled with 2 time periods per day (Supplementary, Table S1). We
426 believe that validation at a 15-minute time-step will be similar because we do not observe large
427 changes in flows across 1-hour periods for which we have energy pricing data.

429 4.2 Saturday-Sunday-Weekday Model

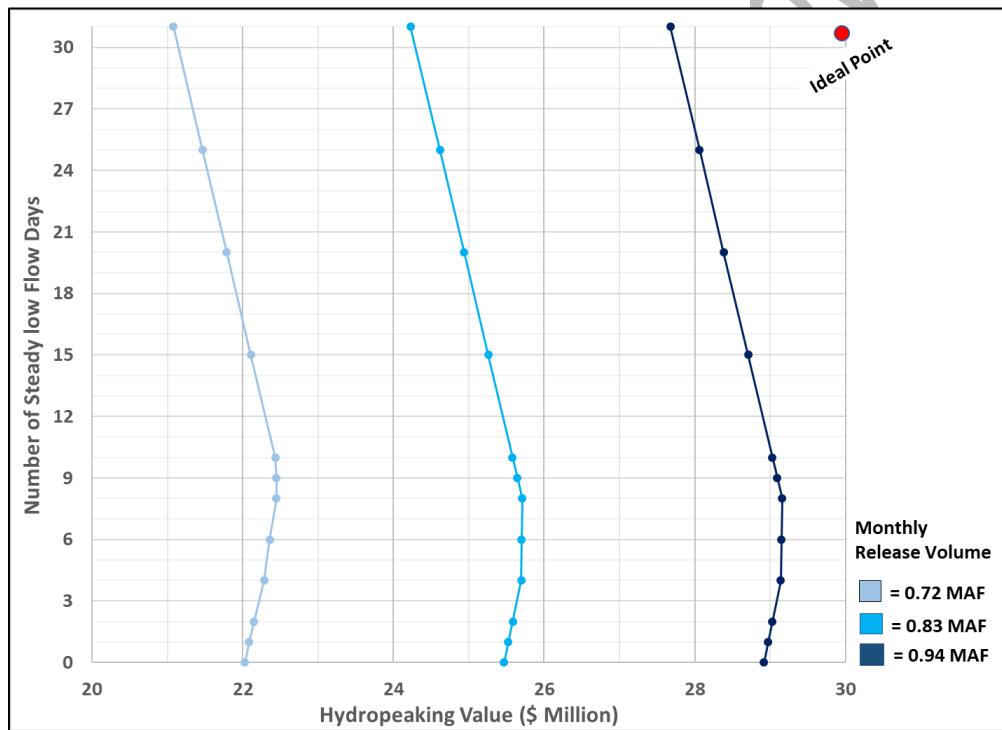
430 Using the Saturday-Sunday-Weekday model with contract prices, hydropeaking value increased
431 by \$56,000 for each added Sunday and by \$3,900 for each added Saturday of steady low flow
432 (Figure 4). The counter-intuitive increases in hydropeaking value per added weekend day of
433 steady flow moved tradeoff curves closer to the ideal point of large hydropeaking value and
434 more weekend days of steady low flows (Figure 4, red circle). The increase in hydropeaking
435 value occurred because constraints Eq. S16 and S17 were relaxed during the load following pre-
436 bug flow hydrograph. These constraints govern the relationship between on-peak releases on
437 weekends and weekdays and activate only when steady bug flows extend beyond the weekend.
438 Above 8 days of steady low weekend flows, hydropeaking values decreased by \$64,000 per day
439 for each weekday of steady low flow added. Here, constraints S7 and S8 controlled change in
440 release between periods. Thus, the bug flow hydrograph with 8 weekend steady low flow days
441 per month maximized hydropeaking value.

442 Each additional 0.11 MAF of monthly release volume from 0.72 to 0.94 MAF representing dry
443 to wet conditions added an extra ~\$3.5 million in monthly hydropeaking value (Figure 4, darker
444 blue tradeoff curves pushed right and outward). The slopes on the 0.72 MAF per month tradeoff
445 curve differed because constraints S7 and S8 did not bind with the lower monthly flow volume.
446 For the release scenarios of 0.72, 0.83, and 0.94 MAF per month, hydropeaking value with zero
447 steady flow days generated the same value as at 16, 12, and 12 days of steady low reservoir
448 releases.

449 The number of steady low flow days controlled the on- and off-peak releases (Supplementary,
450 Fig. S10). Up to and including 8 steady low flow days, the model reduced off-peak releases on
451 *hydropeak* days and steady low flow releases. The saved water was released during on-peak
452 weekdays to maximize overall hydropeaking value. Above 8 steady low flow days, the constraint

453 that defined the allowable change in release between periods was triggered, so the model
454 increased peak and base releases.

455 A decreasing price difference between weekday on- and off-peak prices moved the tradeoff
456 curves left towards less hydropeaking value (Supplementary, Fig. S11). An increase in offset
457 releases slightly decreased hydropeaking value (Supplementary, Fig. S12). For the remainder of
458 this analysis, we use only the single offset release of 1000 cfs differential between off-peak
459 weekday and steady releases (H1000).



460
461 **Figure 4.** Tradeoffs between monthly hydropeaking value and the number of steady low flow
462 days from the Saturday-Sunday-Weekday model during August. The model only has contract
463 prices, no offset release, and release volumes ranging from 0.72 MAF per month (dry conditions,
464 light blue) to 0.94 MAF per month (wet conditions, dark blue). The ideal point in the upper-right
465 corner (red circle) represents the best possible outcome where the hydropeaking value and

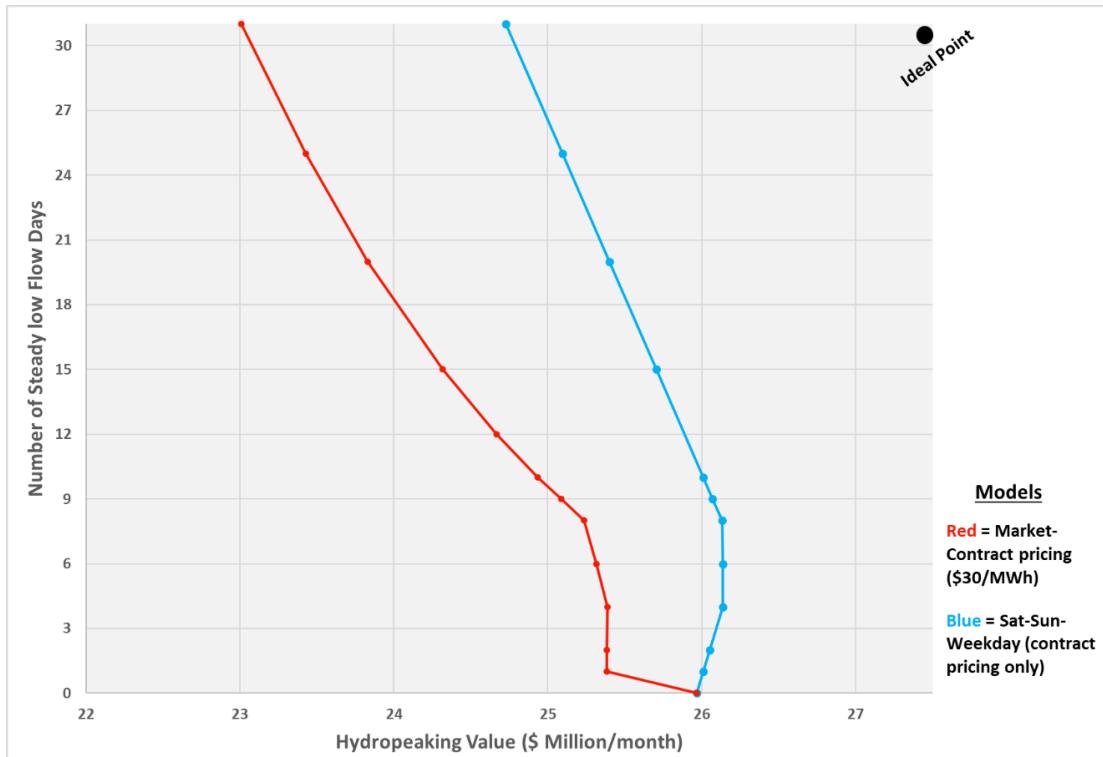
466 environmental objectives are maximized. This outcome is not achievable because of limitations
467 in the way bug flow experiments are currently implemented.

468 4.3 Market-Contract Pricing Model

469 Adding a \$30/MWh increase above average contract prices—representing purchase of deficit
470 energy on the market—shifted the tradeoff curves left, reducing hydropeaking value compared to
471 the Saturday-Sunday-Weekday model with only contract prices (Figure 5, red vs. blue traces).
472 The release hydrograph remained unchanged across the scenarios because the rate-of-change
473 constraint between on- and off-peak periods was binding. Across all market price scenarios, each
474 added day of steady release reduced hydropeaking value. No breakeven point was observed.

475 4.4 Costs for Bug Flows

476 We estimated that a \$30/MWh market price increase above contract prices had a variable impact
477 on hydropeaking value, ranging from a profit of \$0.16 million to a loss of \$3.2 million between
478 March and October, with 4 to 30/31 days of steady low flows per month (Table 1). The largest
479 decreases in hydropeaking value were during high load months of May to August (Table 1).



480

481 **Figure 5.** Comparison of tradeoffs between the prior Saturday-Sunday-Weekday model with
482 contract prices (blue) and a \$30W-hour (red) increase in the market price for a monthly 0.83
483 MAF release volume in August 2018 (moderate hydrology) with a 1000 cfs offset. Here,
484 \$30/MWh represents an increase in contract prices across all periods and day types.

485 **Table 1.** Cumulative loss of hydropeaking value (\$ million) per added day of steady release in
486 2018 with 0.83 MAF release volume, H1000 (offset release), and market prices \$30/MWh above
487 contract prices. Losses are calculated relative to zero steady low-flow days (hydropeaking).
488 Rows highlighted in blue indicate percentage losses. The negative sign indicates an increase in
489 hydropeaking value, as opposed to a decrease.

Month	Value at Zero Steady days	Cumulative loss of hydropeaking value (\$ million) for the number of steady low flow days per month							
		4	6	8	10	15	20	25	30

March	19.9	0.3	0.36	0.41	0.59	1	1.32	1.59	-	1.87
		1.5%	1.8%	2.1%	3.0%	5.0%	6.6%	8.0%	-	9.4%
April	18.2	-0.16	-0.09	-0.03	0.15	0.47	0.71	0.93	1.12	-
		-0.9%	-0.5%	-0.2%	0.8%	2.6%	3.9%	5.1%	6.2%	-
May	18.4	0.4	0.46	0.51	0.73	1.18	1.53	1.82	-	2.13
		2.2%	2.5%	2.8%	4.0%	6.4%	8.3%	9.9%	-	11.6%
June	20.1	-0.05	0.02	0.08	0.32	0.8	1.12	1.38	1.62	-
		-0.2%	0.1%	0.4%	1.6%	4.0%	5.6%	6.9%	8.1%	-
July	25.3	0.65	0.72	0.8	1.11	1.79	2.3	2.73	-	3.16
		2.6%	2.8%	3.2%	4.4%	7.1%	9.1%	10.8%	-	12.5%
August	25.5	0.58	0.65	0.73	1.04	1.65	2.14	2.54	-	2.96
		2.3%	2.6%	2.9%	4.1%	6.5%	8.4%	10.0%	-	11.6%
September	23.6	-0.12	-0.05	0.02	0.24	0.59	0.9	1.16	1.39	-
		-0.5%	-0.2%	0.1%	1.0%	2.5%	3.8%	4.9%	5.9%	-
October	21.8	0.37	0.44	0.5	0.71	1.18	1.55	1.86	-	2.18
		1.7%	2.0%	2.3%	3.3%	5.4%	7.1%	8.5%	-	10.0%

490 5. Financial Instrument to Reduce Hydropeaking-Ecosystem Conflict.

491 The win-lose Market-Contract tradeoff curve (Figure 5, red line) highlight a conflict between
 492 hydropower producers and ecosystem managers. Under the current institutional arrangements,
 493 there is negative feedback where bug flows reduce hydropeaking value, increase costs to
 494 hydropower customers, decrease money for future bug flow experiments, and decrease money
 495 available to maintain project infrastructure and repay loans. This negative feedback loop
 496 exacerbates conflict between hydropower producers and ecosystem managers.

497 To reduce the conflict, we suggest that other federal and state agencies (e.g., Bureau of
 498 Reclamation, National Park Service, state fish and game agencies, etc.,) and/or environmental
 499 non-governmental organizations provide ecosystem managers a budget and greater flexibility to
 500 schedule the timing and number of days of steady low releases. The budget corresponds to the

501 lost hydropeaking value for the current summertime weekend steady flow days. A \$600,000 to
502 \$900,000 monthly budget corresponding to a \$30/MWh increase in market prices over contract
503 prices is small compared to the ~ \$20 million value of hydropeaking per summer month, ~ \$200
504 million hydropower value per year, and recent Federal payments in excess of \$200 million to
505 fund water conservation efforts across the Colorado River basin. Managers can use the budget
506 and their ecosystem expertise to experiment with different days of steady low releases during the
507 summer and/or fall months and compensate hydropower producers for the costs of days of steady
508 low releases.

509 Graphically, the payments convert the left-sloping, win-lose Market-Contract tradeoff curve
510 (Figure 5, red line) into vertical lines of constant, stable hydropeaking value. These lines
511 intercept the x-axis at the hydropeaking value in months with zero days of steady low releases
512 (Table 1, Column 2, *Revenue₀ [\$]*). Mathematically:

$$513 \text{Hydropeaking_Value}_0 = \text{Hydropeaking_Value}_n + \text{Payment_for_SteadyRelease}_n \quad (\text{eq. 2})$$

514 Here, *Hydropeaking_Value₀* (\$) and *Hydropeaking_Value_n* (\$) are the modeled hydropeaking
515 value for 0 and *n* days of steady releases (Figure 5, red line). *Payment_for_SteadyRelease_n* (\$) is
516 the difference in value between 0 and *n* days of steady low releases (Table 1).

517 The cumulative losses in hydropeaking value (Table 1) also suggest new experimental releases
518 that can reduce bug flow costs—or increase the number of days of steady low flows without
519 reducing hydropeaking value. One possibility is to shift days of steady low releases from
520 summer to spring/fall months when hydropeaking value is lower and bug flows are not presently
521 implemented (e.g., March, April, September, and October). Managers can then monitor whether
522 the shifts increase gross primary production (Deemer et al., 2022; Palmer and Ruhi, 2019), help

523 small larvae in fall months and larger larvae right before they emerge in spring months
524 (Kennedy, personal communication, 2024), improve other ecological functions, or increase
525 recreational benefits (Beechie et al., 2010; Getzner, 2015; Kennedy et al., 2016; Koehn et al.,
526 2019; Nilsson and Berggren, 2000; Palmer and Ruhi, 2019; Reid et al., 2019; Richter and
527 Thomas, 2007; Stromberg, 2001; Stromberg et al., 2007). Such shifts may also advantage native
528 fish (Hensen et al, 2023) and reduce flow deviations closer to natural fluctuations (Lytle and
529 Poff, 2004; Palmquist et al., 2024).

530 The following are example scheduling shifts:

- 531 • Eight days of steady weekend releases in April and eight days of steady weekend releases
532 in June that cost \$600,000.
- 533 • Eight days of steady weekend and seven additional days of steady weekday releases in
534 April for \$530,000 or in September for \$520,000.
- 535 • Six days of steady weekend releases in May and six days of steady weekend releases in
536 July that cost \$600,000.

537 There are several other combinations (see Supplementary Table S4). Similarly, Table 1 and
538 Table S3 (Supplementary) can help allocate the available budget for purchasing a number of
539 steady low-flow days.

540 6. Discussion

541 This study quantifies win-lose tradeoffs between hydropeaking value and the number of days of
542 steady low releases that increase primary and aquatic invertebrate production. We propose an
543 annual budget for ecosystem managers, offering them flexibility to select the number and timing
544 of steady low-flow days and compensate hydropower producers for loss in hydropeaking value.

545 This budget-based approach may better serve both ecosystem and hydropower interests (win-
546 win). The proposed budget-based approach contrasts with the present institutional arrangement,
547 where bug flow days are funded by hydropower revenue.

548 Ecosystem managers may use the budget to experiment with extending days of steady low
549 releases from Glen Canyon Dam outside of summer months into spring and fall months.

550 Managers can then monitor whether the shifts increase gross primary production (as suggested
551 by Deemer et. al, 2022) and/or help small larvae in fall months and larger larvae right before
552 they emerge in spring months (as suggested by Kennedy, personal communication, 2024).

553 Managers may also monitor whether shifts reduce flow deviations closer to natural fluctuations
554 (as suggested by Palmquist, et al, 2024) and advantage native fish (as suggested by Hensen et al,
555 2023).

556 Within the context of prior work, we discuss 10 factors that helped to reduce hydropeaking-
557 ecosystem conflict at Glen Canyon Dam and 3 additional considerations to implement potential
558 modifications to existing Glen Canyon Dam operations.

559 1. Flow partition. We found wins by partitioning the seasonal and weekly flow regimes into
560 periods of steady low flows that benefited aquatic invertebrates and periods where
561 hydropeaking allowed producers to maximize value. Prior work beneficially partitioned
562 flow at either the inter-annual (Dalcin et al., 2023), seasonal (Chen and Olden, 2017; Jager
563 and Uria-Martinez, 2023), or daily (Jones, 2014) time scale.

564 2. Bi-objectives. Two objectives defined the modeled hydropeaking-bug conflict. Tradeoffs
565 were visualized with Cartesian plots. In contrast, Hegwood et al. (2022) reported more
566 difficulty in finding wins as the number of objectives increases. Similarly, it is more

567 challenging to visualize tradeoffs as the number of objectives increases (Bonham et al.,
568 2022; Rosenberg, 2015).

- 569 3. Linear relationships. As a large-volume reservoir, Lake Powell sees only a small water
570 surface drop from Glen Canyon Dam's monthly releases relative to the operating head.
571 Thus, the hydropower objective to maximize value was decomposed and linearized with
572 respect to monthly release volume, month of the year, week type, and daily on- and off-
573 peak periods. Similarly, ecosystem managers suggested expressing the bug objective as
574 the number of days per month of steady low releases. This number varied from 0 to 31
575 days per month. Linear models and relationships are easier to represent, solve, visualize,
576 and communicate.
- 577 4. Single reservoir system. The study system was for a single reservoir that was also the
578 primary driver of the downstream flow regime. Tradeoffs and operations are more
579 complex for geometries with multiple reservoirs in series or parallel (Lund and Guzman,
580 1999).
- 581 5. Concave tradeoffs. Null et al., (2021) hypothesized that points of maximum concavity
582 may represent promising compromise operations. In this work, we found 3 concave
583 tradeoffs:
- 584 a. Existing bug flows on 8 weekend days per month with contract pricing. This point
585 was closest to the ideal point of large hydropower value and many days of steady
586 low flows.
- 587 b. Switching bug flows to spring/fall months meant less cost per day for steady low
588 releases. Lower cost per day pushed tradeoff curves closer to the ideal point.

589 c. The new instrument to pay hydropower producers for days of bug flows preserved
590 hydropeaking value across all numbers of days per month of steady low flow.

591 Tradeoff curves became perfectly convex. Each curve passed through the ideal
592 point of maximum hydropeaking value and a maximum number of days of steady
593 low releases.

594 6. Stabilize revenue for hydropower producers. Providing an annual budget for ecosystem
595 managers to compensate hydropower producers for loss in hydropeaking value will
596 stabilize hydropower revenues. If week- or day- ahead market prices increase for a day
597 scheduled for steady releases, managers can shift bug flows later in the week or later in the
598 month.

599 7. Small monetary amounts. Budgets up to \$1 million per summer month are small compared
600 to the ~ \$20 million value of hydropeaking per summer month, ~ \$200 million
601 hydropower value per year, and recent Federal payments in excess of \$200 million to fund
602 water conservation efforts across the Colorado River basin.

603 8. Provide insights and flexibility rather than prescriptions. Our work suggests a new
604 framework for experimental flows. Give ecosystem managers a budget to choose the
605 timing and number of days of new experimental steady low releases and then pay
606 hydropower producers for the lost value. One potential new experiment is move days of
607 bug flows from summer to spring/fall months to reduce costs. Flexibility allows ecosystem
608 managers to use emerging data and their expert judgment to pick the number and timing of
609 days of steady low flows rather than contesting new operations with hydropower
610 managers. Flexibility also avoids the need for researchers to define and include ecosystem
611 preferences in a model.

612 9. Repeated engagement and collaboration with managers. Ecosystem managers and
613 hydropower operators defined the bi-objectives for hydropeaking value and the number of
614 days of steady low flows in collaboration with researchers. We also regularly engaged
615 with managers to acquire data, share preliminary results, discuss results, and put results in
616 context. For example, engagement helped us understand current institutional arrangements
617 such as offset releases, the difference between contract and market energy prices, and how
618 experimental bug flows are funded. These institutional arrangements are not described in
619 the peer-reviewed literature. As an example of this success, our collaborating hydropower
620 and ecosystem managers invited us to present this work to the technical work group for
621 the GCDAMP in April 2023 (Rind and Rosenberg, 2025). Technical work group members
622 wanted to further investigate our findings and insights. These insights can inform the
623 design and implementation of new, more expensive experimental releases (since August
624 2024) through Lake Powell's low level river outlets that bypass hydropower generation
625 and have the goal to lower downstream temperature and disadvantage small-mouth bass.
626 Our engagement followed many best practices for collaborative and participatory
627 modeling (Langsdale et al., 2013; Voinov et al., 2016). In contrast, prior ecosystem
628 optimization efforts did not mention engagement with or take up by managers (Horne et
629 al., 2016).

630 10. Situated work in institutional context, enabling legislation, and policy environment. Our
631 engagement with ecosystem and hydropower managers also helped us identify how an
632 ecosystem budget can correct an existing institutional arrangement and negative feedback
633 loop where bug flows reduce hydropeaking value. The GCDAMP technical workgroup
634 also provide a regulatory and policy environment where new operations can be discussed,

635 implemented, and tested. In contrast, many similar efforts fail because there is not a larger
636 environment to implement researcher recommendations (Owusu et al., 2022).

637 There are additional considerations to implement more flexible operations:

- 638 1. The 2016 Record of Decision (DOI 2016) states that bug flows will occur on weekends in
639 May through August with no discussion of how to address corresponding decreases in
640 hydropower revenue. At the same time, the Secretary of the Interior retains the (i) ability
641 to adjust the duration and other characteristics of experimental bug flows based on the
642 results of initial experiments, and (ii) sole discretion to decide how best to accomplish
643 operations and experiments in any given year. Given the conflict surrounding nearly all
644 aspects of Colorado River management, Interior may decide to issue a new supplemental
645 EIS that allows for bug flows in spring/summer. Interior issued a similar supplemental
646 EIS in spring 2024 to allow for water releases through Glen Canyon Dam's low-level
647 outlets—no hydropower generation—in summer and fall of 2024 to 2026 to lower release
648 temperature with the goal to disrupt spawning of small mouth bass.

- 649 2. We acknowledge that future energy prices may change the magnitude of reported
650 hydropeaking values, lost value per day of steady low releases, and ecosystem budget. At
651 the same time, our on-peak weekday market energy prices up to \$110/MWh were
652 insensitive to surges to \$300/MWh for a few hours per week in August and September
653 due to high load, drought, or other exogenous regional energy market fluctuations
654 reflected in a comparison pricing dataset (Lucas S Bair and Charles B Yackulic, 2024;
655 Yackulic et al., 2024). Our prices were insensitive because prices for a few surge hours
656 per week were averaged across 80 weekday on-peak hours per week (16 on-peak hours
657 per day x 5 days per week = 80 on-peak hours per week). In fact, our weekday on-peak

market prices in the high load months of August and September were \$3 to \$9/MWh
higher than averaged prices in the comparison dataset. Similarly, for the months of
March through July and October, our weekday on-peak prices were \$22 to \$37/MWh
higher than weekday average prices in the comparison dataset. A similar pattern held for
weekday off-peak prices. These comparisons suggest that our estimates of the economic
impacts of existing steady low releases in late summer months are similar whereas the
economic benefits to switch to days of steady low flows to spring/fall months might be
larger than we report.

3. The energy generation formula we used does not capture a declining Lake Powell water
levels across multiple years. Drawdown lowers energy head, efficiency, generation, and
hydropeaking value. As energy generation decreases, we expect tradeoff curves for
hydropeaking value and days of steady releases will shift left to lower value (e.g.,
Supplementary, Figure. S11). We also expect the tradeoff curves to show larger lost value
per day of added steady low release.

We recommend the following next steps:

- Update results with more recent hydropower prices.
- Further validate results—use the proprietary GTMax SL model that hydropower
producers use to schedule hydropower operations.
- Further engage people at federal agencies such as Reclamation and National Park Service
and state fish and game agencies.
- Apply the proposed financial instrument to other reservoir releases that benefit
ecosystems and reduce hydropower value. These releases may mobilize sediment, build
sand bars, or disadvantage non-native fish (USBR, 2016). These experimental releases

681 are more controversial because the impacts on hydropower are larger. For example, these
682 experiments include releases through the low-level river outlets that do not generate
683 hydropower for a few days in a season (sediment) or every off-peak of every day for late
684 summer and fall months (disrupt small mouth bass spawning). Thus, giving ecosystem
685 managers flexibility to schedule releases to mobilize sediment or disrupt spawning by
686 invasive fish will require larger budgets by a factor of 20 or more relative to bug
687 experiments.

688 7. Conclusions

689 Steady low reservoir releases allow downstream aquatic invertebrates to lay and hatch more
690 eggs. These releases also lower turbidity and water stage, which increases algal production—an
691 important food for bugs. Steady low releases also reduce hydropeaking value, increase costs to
692 hydropower customers, lower funds to maintain project infrastructure, delay loan repayment, and
693 exacerbate conflict between hydropower and ecosystem managers. We formulated and solved a
694 bi-objective optimization model to quantify tradeoffs between hydropeaking value and the
695 number of days of steady low releases. We validated monthly energy generation and value in the
696 months of March to October, 2018. We ran scenarios for different monthly release volumes,
697 peak- and off-peak energy price differentials, offset releases, and market energy prices for March
698 through October.

699 We found that the 2018 experiment of steady low releases for eight weekend days per summer
700 month reduced hydropeaking value by \$600,000 (May) to \$900,000 (July). To reduce
701 hydropeaking-ecosystem conflict, we suggested to give ecosystem managers a budget to choose
702 the timing and number of days of new experimental steady low flows and then pay hydropower
703 producers for the lost value. One potential experiment—also suggested by recent ecological

704 monitoring and modeling—is to shift days of steady low releases from summer to spring/fall
705 months. Our pricing data was insensitive to price surges to \$300/MWh for a few hours in a week.

706 We achieved the above results because we engaged with hydropower and ecosystem managers
707 through the duration of our research project. We believe our work can be improved by including
708 inputs from the proprietary GTMax SL model used by hydropower producers. We also believe
709 that a financial instrument that gives ecosystem managers a budget to schedule steady low flows
710 can be extended to other reservoir releases that reduce hydropower value such as mobilize
711 sediment, build sand bars, and/or disadvantage non-native, invasive fish.

712 8. Data Availability Statement

713 The data, models, code, and directions to use are available in a Hydroshare repository (Rind and
714 Rosenberg, 2025). Bhupinderjeet Singh and Philip Moffatt at Washington State University, USA
715 downloaded the materials and reproduced all figures and tables.

716 9. Declaration of Competing Interest

717 The authors declare that they have no known competing financial interests or personal
718 relationships that could have appeared to influence the work reported in this paper.

719 10. Acknowledgments

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725 identify tradeoffs between hydropeaking value and days of steady low flows.

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