United States Department of the Interior

FISH AND WILDLIFE SERVICE

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Albuquerque, New Mexico 87103

In Reply Refer To:
FWS/R2/ES-ARD/080094

December 11, 2023

Genevieve Johnson
2007 Interim Guidelines SEIS Project Manager
Bureau of Reclamation, Upper Colorado Basin
125 South State Street, Suite 8100
Salt Lake City, Utah 84138

Dear Ms. Johnson:

The U.S. Fish and Wildlife Service (Service) appreciates this opportunity to comment on the Bureau of Reclamation's (Reclamation) Near-term Colorado River Operations Revised Draft Supplemental Environmental Impact Statement (SEIS) as posted in the Federal Register (FR) notice on October 27, 2023 (88 FR 73840). The Service has prepared comments to address issues related to this action and its compliance with the Endangered Species Act of 1973 (16 U.S.C. *et seq.*) (ESA), as amended, and the National Wildlife Refuge System Act (16 U.S.C. § 668dd). The Service previously provided comments during the September 2023 Cooperating Agency review and appreciates the significant work Reclamation has completed to incorporate, address, and respond to those comments.

The attached excel spreadsheet contains 56 unique comments. For ease of review, the comments have been color coded into categories: 12 editorial comments (grey); 6 technical comments (blue); 32 clarifying comments (green) and six substantive comments (orange). The clarifying comments are typically seeking additional information to explain the "why" behind a conclusion drawn and not necessarily requesting a change in the conclusion. The substantive comments are discussed further below.

Existing Endangered Species Act Compliance and Consultation History

The geographic scope of this action is large, and it will intersect with multiple Service Regions and programs, building on multiple existing ESA consultations. The geographic scope is also divided into two Reclamation program areas, Reclamation's Upper Colorado River Basin and the Glen Canyon Dam, Adaptive Management Program (GCDAMP), and Reclamation's Lower Colorado River Basin and the Lower Colorado River Multi-Species Conservation Plan (LCR MSCP).

There is a long consultation history between the Service and Reclamation involving operations at Glen Canyon Dam and Hoover Dam, and potential downstream effects inclusive of the Salton Sea. A full list of consultations is on file in the Arizona and Palm Springs Ecological Services Field Offices. Consultation histories and summaries can also be found in the 2016 Biological Opinions for the Long-Term Experimental Management Plan (LTEMP), the 2018 Biological Opinion for LCR MSCP, and the 2022 Biological Opinion for LCR MSCP. Salton Sea and surrounding areas consultation histories can also be found in Section 7 consultation documents for the 1996 All American Canal Lining Project; the 2002 Coachella Canal Lining Project; the 2002 Quantification Settlement Agreement; and the 2023 Salton Sea 10-Year Management Program

National Wildlife Refuge System

Four Service National Wildlife Refuges (NWRs) are located directly along the lower Colorado River (Havasu NWR, Bill Williams NWR, Cibola NWR, and Imperial NWR), and a fifth, Sonny Bono Salton Sea NWR, is connected to the lower Colorado River through water deliveries by the Imperial Irrigation District and Coachella Valley Water District. Each NWR was established by Congress for a designated purpose and shall be managed to fulfill the purpose under the legal authority of the establishing statutes. These refuges are dependent on water that passes through and that is diverted from the Colorado River. The four NWRs in Arizona serve as integral components of the LCR MSCP.

The Service is concerned with downstream effects to the NWRs and backwater habitat due to the changes in releases resulting from alternatives being considered. The Service requests information on the projected minimum releases for the alternatives, including flow rate, seasonal timing, duration, and related river stage elevation decreases. This information will allow the Service as a downstream water user to quantify effects from decreased river flows, especially downstream of Lake Mead.

Salton Sea

The Proposed Action indicates that 840,000 acre-feet of additional water conservation would be undertaken by Imperial Irrigation District (750,000 acre-feet) and Coachella Valley Water District (90,000 acre-feet) between 2024 and 2026. These conservation actions are in addition to water conservation commitments made under the Quantification Settlement Agreement.

The SEIS generally states that the impacts to the Salton Sea will be similar under the No Action Alternative and the Proposed Action. However, the three-year reduction of 840,000 acre-feet of water deliveries to the two water districts is significant. The Service anticipates that these three-year reductions may result in declines in Salton Sea elevation, increases in Salton Sea salinity and exposed lakebed, and the loss of irrigation drain fed wetlands around the Salton Sea due to less water being drained off Imperial County and Coachella Valley agricultural fields. These effects would be cumulative and be in addition to what would occur under the No Action Alternative, and therefore the impacts may not be similar.

Further, as the Salton Sea has receded, some agricultural drains no longer reach the Salton Sea but empty onto the exposed lakebed and have formed wetlands that support the federally listed desert pupfish and Yuma Ridgway's rail. The Proposed Action could result in loss of in the extent of these wetlands and a decline in water quality, which would result in loss of habitat to listed species. Please revise the analysis accordingly and include a discussion of the occurrence of Yuma Ridgway's rail and desert pupfish in the wetland areas downstream of the agricultural drains. The Service's biological opinion for the Salton Sea 10-Year Management Program, issued to the Army Corps on February 23, 2023, can provide baseline desert pupfish occurrences in these locations.

Concurrent Analyses

Concurrent to this process, the Service is also consulting with Reclamation on a SEIS analysis of flow regimes (high flow experiments) under LTEMP to deter non-native smallmouth bass reproduction below Glen Canyon dam and to increase sediment flow windows. The Service is also consulting with Reclamation on an EIS on the Development of Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead. The post-2026 NEPA process will revisit all sections of the 2007 Interim Guidelines and other domestic operating agreements to guide operations in a wide range of future conditions beyond 2026. Further, through the consultation process on this SEIS, the Service and Reclamation have agreed that greater analyses will be completed during this full EIS process on post-2026 operations.

This SEIS to develop near-term Colorado River operation options and address extreme drought conditions during the 2024-2026 timeframe does not update the baseline information for any of the federally listed species and instead relies on the historic baseline as described in the 2005 LCR MSCP Biological/Conference Opinion and the 2007 Interim Guidelines. The Service anticipates that the post-2026 NEPA process will update all baseline conditions. The Service also anticipates working closely with Reclamation and the 57 LCR MSCP partners during the post-2026 process to determine appropriate analyses and any needed steps to re-issue the 10(a)1(B) permit if an amendment to that permit is needed.

Conclusion

Thank you again for the opportunity to comment on this important issue. The Service recognizes the breadth of challenges facing Reclamation as you work to balance water demand and water availability, federally listed species and habitat needs, and dam safety and integrity. We stand committed and ready to assist Reclamation with all phases of this SEIS and the other concurrent NEPA planning processes. Please include the Service as early as possible so that we can provide input and be responsive to time intensive aspects of project requirements.

We appreciate your ongoing commitment to interagency coordination. Thank you for the opportunity to comment on this draft SEIS. We understand the challenges of this expedited and expansive planning process for Reclamation staff and your contractor, and we genuinely appreciate your efforts. The Service looks forward to the continued close coordination with Reclamation as you move toward a final version of the SEIS in March of 2024.

If we can be of further assistance, please contact Jonna Polk, Assistant Regional Director, Ecological Services, at Jonna_polk@fws.gov or 918-408-0850. If you need any further clarification of our comments, please contact Deborah Williams, Colorado River Special Assistant, at Deborah_williams@fws.gov or 575-517-6091.

Sincerely,

Regional Director

Enclosure

cc: Matt Hogan, Region 6 Regional Director, Business Office matt_hogan@fws.gov
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SEIS for Near-term Colorado River Operations

October 27 Draft SEIS - Due to BOR Dec 11, 2023.

Editorial Comment (typos)	Technical comment - comment where we are adding information for them to	Substantive Comment	Clarifying Comment - we are asking for a correction or addition of more info to give better

Cmt #	Section #	Line # / Table #	Page Number	Comment
1	0	Mission Statement	0-0	The last sentence of the mission statement is incomplete, please update.
2	0	Dear Reader Letter	0-1	In Dear Reader letter, first paragraph, explain what you mean by "improved hydrology." It's not clear whether this means improved hydrological modeling, or whether hydrological conditions improved on the ground. Please explain what specific elements of the hydrology improved (for example, increase in stage, increase in flows during a critical period, favorable changes in the timing and duration of flows, etc.). This will help readers understand why the two model runs (Sep 2022 and June 2023) yielded such different results, along with the uncertainty and associated limitations of the forecasts. Helping readers understand the change in forecasting is especially important since the June 2023 forecast was the basis for eliminating Alternatives 1 and 2 from detailed analysis. Not all readers will have a hydrologic background, an explanation in plain language for clear government communication that the public can understand and use would be appreciated.
3	1.1		1-11	Please review paragraph on the Service. Either revise sentence concerning the number of refuges managed to include the three along the green river (e.g. Seedskadee; Browns Park; Ouray) and Sonny Bono Salton Sea OR revise the sentence to state that there are 4 refuges along the Lower Colorado River.
4	2.1	Table 2-9	2-23	Table 2-9 Summary of Potential Effects of the Alternatives states that the No Action alternative results in slightly higher to substantially higher flows in the river than the Proposed Action alternative. As related to the alternatives, quantification of the difference between these no action flows and the action alternatives is needed. Specifically, information is needed for projected minimum releases including flow rate, seasonal timing, duration, and related river stage elevation decreases due to additional decrease of flow rates.
5	2.1	2-9	2-25	The Proposed Action indicates that between 2024 and 2026, 840,000 acre-feet of additional water conservation would be undertaken by Imperial Irrigation District and Coachella Valley Water District (Table 3-3). This water conservation is in addition to commitments made under the Quantification Settlement Agreement (QSA), so declines in Salton Sea elevation, increases in Salton Sea salinity, and increases in exposed lakebed around the Sea would be cumulative and be in addition to what would occur under the No Action Alternative. This analysis should be confined to the analysis timeframe, that is, through 2026. Also, the draft SEIS limits the analysis to water inputs into the Salton Sea. We recommend the analysis also include effects to the approximately 1,500 acres of wetlands that have become established on the exposed lakebed at the end, and downstream, of the irrigation drains that drain onto the exposed lakebed.
6	2.1	2-9	2-27	Salton Sea lakebed exposure will likely increase under the Proposed Action. California's commitment to 1.6 million acre-feet of additional water conservation between 2024 and 2026 is in addition to commitments made under the Quantification Settlement Agreement, and based on Table 3-3, most of this water conservation will come from water reductions to the Imperial Irrigation District (750,000 acre-feet) and the Coachella Valley Water District (90,000 acre-feet) so the declines in Salton Sea elevation, increases in Salton Sea salinity and exposed lakebed, and loss of irrigation drain fed wetlands around the Salton Sea could occur due to less water being drained off Imperial County and Coachella Valley agricultural fields. These effects would be cumulative and be in addition to what would occur under the No Action Alternative. Please revise the analysis accordingly.
7	2.1	2-9	2-29	As the Salton Sea has receded, some agricultural drains no longer reach the Salton Sea but empty onto the exposed lakebed and vegetation assemblages have formed that support wetland and riparian plant species. These wetlands also support desert pupfish and Yuma Ridgway's rail. The proposed action could result in loss of in the extent of these wetlands and a decline in water quality, which would result in loss of habitat to listed species. Please revise the analysis accordingly.
8	2.5		2-3	Second Paragraph. The SEIS notes that in times of Lake Powell falling below the critical elevation of 3,490 that it would be operating with 3 of 4 river outlet works. Suggest acknowledging potential issues with cavitation anticipated under that scenario.
9	2.7		2-7	1st paragraph under Proposed Action, last sentence, should that read Lake Mead and Lake Powell? The next paragraph states under most scenarios (but not all) there wouldn't be a change in how Lake Powell is operated - but there are scenarios where there could be a change.

10	3.13		3-185	Yuma Ridgway's rail also occur in wetlands downstream of agricultural drains on exposed lakebed surrounding the Salton Sea. Please include a discussion of the occurrence of Yuma Ridgway's rail in these wetland areas. The Service's biological opinion for the Salton Sea 10-Year Management Program, issued to the Army Corps on February 23, 2023, can provide baseline Yuma Ridgway's rail occurrences in these locations.
11	3.13		3-194	The draft SEIS concludes the Proposed Action would cause a decrease in water level and a corresponding increase in exposed playa beginning in late 2025/early 2026 as compared with the No Action Alternative. Please include a discussion in this section describing how the SEIS water conservation would affect the approximately 1,500 acres of permanent wetlands that occur around the Salton Sea where the agricultural drains back up or flood, which was described in section 3.13 on page 3-169.
12	3.13.1	5th paragraph, 6th sentence	3-171	Sentence reads, "Lake Mead also supports the largest self sustaining population of razorback suckers in the Colorado River system, with most of the fish found in the Colorado River and Virgin River inflows." Please replace "largest" with "only."
13	3.13.1		3-171	"Quagga mussels are not considered an issue in this section due to the riverine habitat." This sentence is unclear. Do you mean: quagga mussels are not likely to be present in this section due to lack of suitable habitat?
14	3.13.1	table 3-25	3-175	The table doesn't identify the status of four species. Please add this information.
15	3.13.1	Table 3-25	3-175	The table identifies woundfin as a non-ESA listed species, but this species is ESA listed and should be moved to Table 3-24.
16	3.13.1		3-183	"For habitat requirements for the species in Table 3-24 and Table 3-25, see NatureServe Explorer (2023), which is incorporated by reference." This is not the right way to incorporate by reference. The DSEIS must at least have a summary of the habitat requirements, even if it's only a table, and then lead the reader to another document for details.
17	3.13.1	5th paragraph, 6th sentence	3-184	Sentence reads, " The largest self-sustaining population of razorback sucker in the Lower Basin is found in Lake Mead, primarily in the Colorado River and Virgin River inflows" Please replace "largest" with "only.".
18	3.13.1		3-184	"Impacts on these species will be captured through the analysis of BLM sensitive species that use the same habitat types in the Glen Canyon Dam to Lake Mead sections." How is the reader supposed to know what the effects are on the GCNP special-status species? The text infers that the effects to GCNP species would be the same as for BLM species that use the same habitat. But nowhere does the document identify what type of habitats the GCNP species use. In the "environmental consequences" section, it would be simpler to just list the GCNP species and the alternatives' effects on them. It would also make sense to add these species to Table 3-25 (non-listed species in the affected area).
19	3.13.1		3-185	It's not clear whether or not woundfin are present in the affected area. Start with a sentence that says something like: Woundfish are (or are not) present in the affected area.
20	3.13.1		3-185	"Impacts on these [LCR MSCP] species will be captured through the analysis of BLM sensitive species that use the same habitat types in the Hoover Dam to the SIB section." How is the reader supposed to know what the effects are on the LCR MSCP species? The text infers that the effects to LCR MSCP species would be the same as for BLM species that use the same habitat. But nowhere does the document identify what type of habitats the GCNP species use. In the "environmental consequences" section, it would be simpler to just list the LCR MSCP species and the alternatives' effects on them. It would also make sense to add these species to Table 3-25 (non-listed species in the affected area).
21	3.13.1		3-185	Change "This species has high tolerances for water temperature, salinity, and dissolved oxygen concentration" to "This species tolerates wide temperature fluctuations, low dissolved oxygen, and high salinity (Service 1993).
22	3.13.1		3-201 to 302	Former comment: "Consider including information about warmer temperature possibly increasing chance of increased movement and changes to the existing warm-water nonnative fish assemblage in this large river reach." To provide additional context to this previous comment; we are particularly concerned about the range expansion of flathead catfish. Please provide additional status and justification for how there will be no changes to flathead catfish status.
23	3.13.1		3-165 to 3-168	This section includes a discussion of terrestrial vegetation, which is an important land cover type that provides habitat for terrestrial species. However, a section specifically focusing on aquatic habitats for fish is lacking. This section would benefit from the addition of an aquatic section. For example; on page 3-168, there is an overview of decreasing lake parameters leading to an increase in terrestrial vegetation shoreline increase, but this could also lead to a decrease in aquatic shoreline shrinkages (which is fish habitat).
24	3.13.1		3-168	Under "Hoover Dam to SIB," this paragraph would be much easier to understand if you just replaced it with a list of the cover types and subtypes.
25	3.13.1		3-168	The section "Hoover Dam to SIB" mentions of tamarisk beetles. Were these intentionally released to control invasive tamarisk? I think the text is trying to say that the defoliation of tamarisk by the beetle is a positive thing, because it's helping to control a non-native species. But it never actually does say that outright - the reader has to assume. Please clarify.
26	3.13.2		3-186	"The analysis area for fish and aquatic species includes the Colorado River and associated aquatic habitat that is contiguous with the mainstream Colorado River…" It's not clear whether the analysis area includes tributaries to the Colorado River, and if so, how far upstream.
27	3.13.2	~line 23	3-188	typo. Change "Section 13.11.1" to "Section 13.13.1."
28	3.13.2	~line 22	3-188	"Therefore, it is expected that the trends discussed above in Section 3.13.1 (i.e., encroachment of emergent wetland vegetation ...) would continue under this alternative." Section 3.13.1 (subsection "Lake Powell") doesn't actually say anything about encroachment of emergent wetland vegetation. Please resolve.

29	3.13.2	~line 25	3-188	"Under the No Action Alternative, the NPS estimates that any additional acreage of exposed shoreline around Lake Powell has the potential to be invaded by invasive plant species such as tamarisk and Russian thistle." For how long? Is this expected to be permanent? Or would we only expect this to happen during low-water years? Would we expect these area to recover during a high-water year as invasive plants get flooded out?
30	3.13.2	~line 13	3-189	"Total change in habitat (either from suitable to unsuitable or vice versa) is projected to be 19.6 percent of the riparian area in Marble Canyon, 18.6 percent of eastern Grand Canyon, and 22.8 percent of western Grand Canyon." Need to specify whether the change in the amount of suitable habitat is positive or negative. Also, explain what you mean by suitable habitat for native plant species. Can't native plant species potentially grow anywhere? Does this mean riparian habitat?
31	3.13.2	~line 16	3-189	"Nonnative plant species, as a group, are projected to gain suitable habitat…" Define what you mean by suitable habitat for nonnative plant species. Nonnative plants can survive in a wide variety of ecotypes.
32	3.13.2	~line 22	3-189	Consider changing the last two bullet points to a table showing the names of the plants, and whether each one increased or decreased, by reach. That would be more meaningful than knowing the number of plant species that increased or decreased.
33	3.13.2	~line 11	3-190	"...at which point riparian habitat may be affected." Explain how riparian habitat would be affected, how much, and when.
34	3.13.2	Tables 3-26, 3-27, and		In these tables, it's not clear which values represent the conditions under the no action versus the conditions under the proposed action. Please clarify.
35	3.13.2		3-195	"Slight reductions in water levels and increased salinity in the Salton Sea will likely have no detrimental impact on fisheries if sufficient input of freshwater is present." Explain whether or not sufficient freshwater input is present. Also, this sentence conflicts with a later sentence "reduction in flow and increased salinity may reduce habitat for tilapia," the only fish species present in Salton Sea. Loss of habitat would be a detrimental effect. Please resolve.
36	3.13.2		3-197	"During this transitional period, there could be impacts on species that utilize riparian habitat." Describe the types of impacts and the species that would be affected.
37	3.13.2		3-197	The paragraph beginning "sandbars that form…." does not explain the effect of the No Action on backwaters, humpback chub, or flannelmouth suckers. Please add that information.
38	3.13.2		3-197	This paragraph implies that colder water temperatures would only affect rainfow trout and smallmouth bass. Describe which other species would also be affected.
39	3.13.2		3-198	"Most species that utilize riparian habitat in this area are likely habitat generalists that have adapted to changing riparian habitat availability.." Explain whether riparian-dependent species occur near Lake Mead, and if so, how would the No Action alternative affect them.
40	3.13.2		3-198	Explain the effect of the No Action alternative on algal blooms, fish, and wildlife in and near Lake Mead.
41	3.13.2		3-198	Conflicting sentences about the No Action alternative. "Releases from Lake Mead would remain the same," and "flows [from Hoover Dam to the SIB] would be lower." Please resolve.
42	3.13.2		3-200	"Therefore, the magnitude of the effects would be greater under the Proposed Action." I think what you want to say here is that the Proposed Action would have a low magnitude of effect on wildlife, because it would cause only small changes to wildlife habitat.
43	3.13.2		3-200	Paragraph beginning "Impacts on the invertebrate and algal communities…" does not explain how the effects of the Proposed Action on invertebrates and algae differ from the effect of the No Action on invertebrates and algae. Please add this information.
44	3.13.2		3-201	"Impacts on riparian vegetation and terrestrial wildlife species would, therefore, be greater under the Proposed Action than the No Action Alternative." Explain what the impacts to terrestrial wildlife are under the Proposed Action. For example, the Proposed Action would lead to more loss of riparian vegetation than the No Action. The following species would be affected by this loss of habitat: X,Y,and Z.
45	3.13.2	Tales 3-29 and 3-30 and 3-31		The EIS text on page 3-204 says the No Action could benefit bats, so add that information to Table 3-29. For American pelican, bald eagle, condor, and golden eagle, the "potential impacts" column is vague. Further explain the changes to open water and foraging area. For California black rail, the bats, and monarch butterfly, the "potential impacts" column vague. Add information about what the changes to riparian and foraging habitat are.
46	3.3.3	Lines 7 - 11	3-4	The footnote specifies that the ESP traces are based on an ensemble of unregulated streamflow forecasts from NWS. Add explanation of why unregulated flows are representative for this system either here or in Appendix D.
47	3.6		3-22	Second to last paragraph. SEIS states that the proposed alternative will not change how Hoover Dam is operated on an hourly and daily basis as long as sufficient water is available. Could you add more detail about what is (or where to find) the volume or flow considered "sufficient"? And add where to find information on how hourly and daily operations will change when water is not "sufficient".
48	3.6.1 Hydrologic Resources		3-23	Provide information on projected minimum releases for Parker Dam and Davis Dam including flow rate, seasonal timing, duration, and related river stage elevation decreases due to additional decreased flow rates.

49	3.13		3-219	The draft SEIS concludes effects to desert pupfish and Yuma Ridgway's rail from the proposed action would be similar to those of the No Action Alternative, specifically stating that there is no substantial difference in changes to water when comparing the two alternatives. However, desert pupfish and Yuma Ridgway's rail occur in the permanent wetlands downstream of agricultural drains that drain on the exposed lakebed surrounding the Salton Sea. The Proposed Action indicates that 840,000 acre-feet of additional water conservation between 2024 and 2026 would be undertaken by Imperial Irrigation District and Coachella Valley Water District (Table 3-3). This water conservation is in addition to commitments made under the Quantification Settlement Agreement, so declines in wetlands supported by agricultural drain runoff would be in addition to what would occur under the No Action Alternative. Please revise the statement that effects would be similar and acknowledge the increase in water conservation under the proposed action. Also, please include a discussion of the occurrence of Yuma Ridgway's rail and desert pupfish in the wetland areas downstream of the agricultural drains. The Service's biological opinion for the Salton Sea 10-Year Management Program, issued to the Army Corps on February 23, 2023, can provide baseline desert pupfish occurrences in these locations.
50	3.6		3-23	Pages 3-23 through 3-26 contain valuable discussion on potential affects to Dam operations below Hoover Dam. Each section contains a good history of average operation since implementation of the 2007 Interim Guidelines, including minimum annual, daily and hourly releases. Please add information on anticipated minimum annual, hourly and daily releases under the worst case flow reductions allowed under the proposed action. This information would be very valuable in understanding potential impacts at diversion points for National Wildlife Refuges and Conservation Areas.
51	3.7.2		3-84	It is unclear why the potential for additional Salton Sea lakebed exposure refers to a 26-year timeframe. The draft SEIS evaluates near-term operations through 2026 and does not discuss hydrological scenarios for the next 26 years. Therefore, we recommend this analysis be revised to reflect Salton Sea lakebed exposure through 2026 and how that would differ from the No Action Alternative through 2026. Also, the 750,000 acre-feet of additional water conservation between 2024 and 2026 by Imperial Irrigation District is in addition to commitments made under the QSA, so the effects on Salton Sea elevation, exposed lakebed, salinity, and irrigation drain fed wetlands would be cumulative and be in addition to what would occur under the No Action Alternative.
52	Appendix B		B-27	Please provide a summary that compares these modeled shortages for each year. The first paragraph needs additional information.
53	Appendix D		D-1	Please provide background on the CBRFC inflow forecasts that are a foundational input to the hydrologic analysis and study including uncertainty and limitations.
54	D.3.3	Line 18	D-7	What circumstances could produce a negative forecast? An explanation would help our understanding of the equation.
55	D.5.7	Lines 19 - 20	D-10	Please provide detail for the reason to choose no DROA releases in the hydrologic modeling. The Appendix F comparison between no DROA and DROA contributions indicates that the choice affects the shortage tier and DCP contributions in 2026. (page F-8)
56	D.7.3		D-25	C.7.3.6 System Conservation in Appendix D is mislabeled, assuming the title should be D.7.3.7 System Conservation. Please correct if needed.