

**COLORADO RIVER BOARD OF CALIFORNIA**

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Re: Information Collection 1024-COLORIV

Subject: Proposed Information Collection Request (ICR) "Colorado River Total Value Study"  
**79 FR 38946-38947, July 9, 2014**

The purpose of this letter is to provide OMB with the comments of the Colorado River Board of California (CRB) associated with the Information Collection Request (ICR) proposed by the National Park Service (NPS) in its *Federal Register* notice of July 9, 2014.

First, the *Federal Register* notice lacks specific information that would aid the public in more fully understanding the purpose and need of the ICR, and the purported role of the ICR in the broader context of current Glen Canyon Dam long-term management activities. As the *Federal Register* notice does not refer to either the Glen Canyon Dam Adaptive Management Work Group (AMWG) or the Glen Canyon Dam Long-Term Experimental and Management Plan (LTEMP) EIS-development process, it is unclear how any data and/or information collected via the ICR survey instruments would be used by the NPS. While there may be some utility in the use of surveys to collect various types of information related to Glen Canyon Dam operations, the AMWG, or the LTEMP EIS, the CRB suggests that the appropriate venues for those activities should be through the AMWG and with the input of the LTEMP EIS co-lead agencies (i.e., Reclamation and NPS) and cooperating agencies. In fact, the AMWG has a Socio-Economic *ad hoc* group (SEAHG) that has been specifically charged with looking at issues related to values and economic considerations associated with Glen Canyon Dam operations and the natural resources below the dam.

Second, with the respect to the proposed ICR survey instruments (i.e., Survey A: Conjoint Survey; and Survey B: Contingent Valuation Survey), it is not clear that any information collected by the NPS would be of any practical value and contribute to the overall analysis of the six detailed and complex alternatives being evaluated through the LTEMP EIS process. The CRB suggests that both

survey instruments significantly over-simplify and/or under-state the current state of scientific knowledge and uncertainty in the Glen, Marble, and Grand Canyon reaches of the Colorado River, and are currently the subject of a significant amount of research and analysis in the LTEMP EIS-development process, as well as in the on-going Glen Canyon Dam AMWG process. The CRB suggests that the most meaningful and appropriate venue in which to solicit public feedback associated with Glen Canyon Dam operations and natural resources considerations in Glen Canyon National Recreation Area and Grand Canyon National Park is through the National Environmental Policy Act (NEPA) LTEMP EIS process.

The CRB respectfully requests that OMB disapprove the ICR. As presently structured, the ICR is incomplete and potentially misleading. The CRB believes that the most meaningful and informative public input will be obtained through the larger NEPA analysis process occurring through preparation of the LTEMP EIS. In closing, the CRB appreciates the opportunity to have reviewed the ICR and related survey instruments and provide these general comments. If you have any questions, or require additional information, please contact me at (818) 500-1625, or electronic mail at [ttrujillo@crb.ca.gov](mailto:ttrujillo@crb.ca.gov).

Sincerely,

/s/

Tanya M. Trujillo  
Executive Director