



CREDA

Colorado River Energy Distributors Association

ARIZONA

Arizona Municipal Power Users Association

Arizona Power Authority

Arizona Power Pooling Association

Irrigation and Electrical Districts
Association

Navajo Tribal Utility Authority
(also New Mexico, Utah)

Salt River Project

COLORADO

Colorado Springs Utilities

Intermountain Rural Electric Association

Platte River Power Authority

Tri-State Generation & Transmission
Association, Inc.
(also Nebraska, Wyoming, New Mexico)

Yampa Valley Electric
Association, Inc.

NEBRASKA

Municipal Energy Agency of Nebraska
(also Colorado)

NEVADA

Colorado River Commission
of Nevada

Silver State Energy Association

NEW MEXICO

Farmington Electric Utility System

Los Alamos County

City of Truth or Consequences

UTAH

City of Provo

City of St. George

South Utah Valley Electric Service District

Utah Associated Municipal Power Systems

Utah Municipal Power Agency

WYOMING

Wyoming Municipal Power Agency

Leslie James

Executive Director

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August 5, 2014

Office of Management and Budget (OMB)
Office of Information and Regulatory Affairs
Attention: Desk Officer for the Department of
The Interior

Via Email: OIRA_Submission@omb.eop.gov
Submission 1024-COLORIV

RE: Proposed Information Collection; Comment Request: Colorado River Total
Value Survey, 79 FR 38946-38947, July 9, 2014 (ICR)

CREDA is a non-profit regional association comprised of firm electric service customers of the Colorado River Storage Project (CRSP) hydropower and transmission resources. CREDA members are all non-profit entities, and include political subdivisions, state agencies, irrigation and electrical districts, tribal utility authorities and rural electric cooperatives. CREDA members serve over 4 million electric consumers in the states of Arizona, Colorado, Nevada, New Mexico, Utah and Wyoming. CREDA and its members have a vested interest in all aspects of Colorado River/Glen Canyon Dam activities. CREDA also participates in the Glen Canyon Dam Adaptive Management Work Group (AMWG) Federal Advisory Committee, and the Upper Colorado River Endangered Fish Recovery Program. CREDA members are cooperating agencies in the ongoing Glen Canyon Dam Long-Term Experimental and Management Plan (LTEMP) Environmental Impact Statement (EIS) process.

CREDA submitted comments (Attachment) on the previously published (9/23/13) Federal Register Notice (FRN) on this ICR. That FRN provided the public 60 days for comment (with no accompanying documentation); the current FRN provides only 30 days, an insufficient period of time for the public to review the underlying and related documents, which were not readily identified or available on the 7/9/14 FRN. Requests have been made to include discussion of this ICR at the publicly noticed AMWG meeting on August 26-27. This discussion and input could help clarify the ICR and inform AMWG members and the public in development of comments on the ICR.

For these reasons, CREDA **requests an additional 60-day comment period beginning with the initial due date for this collection (August 8, 2014).**

CREDA offers the following *initial* comments in response to the *specific* feedback requested in Section III. Request for Comments.

- 1) The collection of information is *not necessary* and will *not have practical utility*. It does not clearly meet the requirements of 5 CFR 1320 in that it is not necessary for the proper performance of the requesting agency's functions. The Bureau of Reclamation operates the Glen Canyon Dam.

- 2) The public will have the ability to offer its comments on alternatives and analysis contained in the upcoming public draft of the LTEMP EIS. At that time the public may offer its opinions and values associated with the *actual* operational alternatives being considered, as opposed to survey-designed “proposals” that do not accurately portray LTEMP alternatives or resource impacts based on current science, and are designed to elicit specific responses. This ICR, therefore, is unnecessary and misleading.
- 3) *Ways to enhance the quality, utility, and clarity of the information to be collected* would be to clarify the purpose and intent of the ICR, (which changed from the initial FRN to this FRN) and provide a description of the uses of the results. Without this information, CREDA believes that the ICR presents an unwarranted and unnecessary burden on the respondents. In addition, the survey instruments are misleading given the lack of accurate science-based descriptions of operating “proposals”, resource impacts and relationships.

CREDA’s preliminary review of the FRN finds:

- 1) The location of the materials, including survey instruments, is not readily available or clearly identified in the FRN, and although initially referenced in the 2013 FRN, the supporting materials were not available for review and comment until recently.
- 2) Commitment to “include or summarize each comment in our request to OMB to approve this ICR” was not met.
- 3) Inaccurate and misleading legal references contained in the Authorizing Statute(s) information and in Supporting Document A.

In the event an extension of time for comment is not granted, for the foregoing reasons, among others, CREDA recommends that **OMB disapprove this ICR. It is incomplete, incorrect and misleading and should not be used in the LTEMP EIS process or documentation.**

We are available to discuss at your convenience, and appreciate consideration given to CREDA’s request for extension of time for comment.

Sincerely,

Leslie James

Leslie James
Executive Director

Cc: CREDA Board

Cc: [Bret Meldrum@nps.gov](mailto:Bret_Meldrum@nps.gov); phadrea_ponds@nps.gov

ATTACHMENT

CREDA

Colorado River Energy Distributors Association

November 20, 2013

Bret Meldrum, Chief
Social Science Program
National Park Service
1201 Oakridge Drive
Fort Collins, CO 80525-5596

Via Email: Bret_Meldrum@nps.gov

RE: Proposed Information Collection: Colorado River Total Value Study (78 FR 58344, September 23, 2013)
("Information Collection")

CREDA is a non-profit regional association comprised of firm electric service customers of the Colorado River Storage Project (CRSP). CREDA members are all non-profit entities, and include political subdivisions, state agencies, irrigation and electrical districts, tribal utility authorities and rural electric cooperatives. CREDA members serve over 4 million electric consumers in the states of Arizona, Colorado, Nevada, New Mexico, Utah and Wyoming. CREDA and its members have a vested interest in all aspects of Colorado River/Glen Canyon Dam activities. CREDA also participates on the Glen Canyon Dam Adaptive Management Work Group (AMWG) and CREDA members are cooperating agencies in the current Long-Term Experimental and Management Plan (LTEMP) Environmental Impact Statement Process.

CREDA offers the following comments in response to Section III. Request for Comments. Without seeing the proposed survey instrument, CREDA is unable to offer an opinion on the practical utility of the information being gathered, whether the burden hour estimate is accurate, or ways to enhance the quality, utility and clarity of the information to be collected, or ways to minimize the burden on respondents. In addition, without having the visibility of the survey instrument or assessment technique, CREDA cannot comment on whether it is an unbiased survey of the affected population or whether there is a clear distinction of impacts between alternatives described. In order that the results are credible, operational, physical and biological relationships must be based on indisputable scientific conclusions, and CREDA questions whether that objective is achievable given the complex ecosystem interactions in the Grand Canyon.

The Abstract information is not entirely clear as to the scope of the inquiry. Is the inquiry limited to "flora and fauna" and the "riparian resource" in the Grand Canyon? Or is it, as the title implies, a total value study for the entire Colorado River? For example, how will the qualitative opinions of U.S. residents be captured in quantitative (economic analysis) of dam operations? With no indication as to the potential timing of the inquiry, and given CREDA's understanding of the current schedule of the draft LTEMP EIS, how can the instrument adequately describe "alternative management and operation protocols for Glen Canyon Dam" in a manner consistent with the LTEMP alternatives at this point in time?

If the currently proposed instrument is similar to an instrument reviewed by an ad hoc committee of the AMWG, it may be informative to consider the comments provided by that ad hoc group as part of a report issued August 24, 2011. During May-June 2011, the Survey Instrument Ad Hoc Group worked with

representatives of the NPS to review and consider a draft survey instrument. The Group issued a report and recommendations, which were reviewed and considered by the AMWG on August 24-25, 2011. This Ad Hoc Group should be re-engaged to assist in the development and review of the survey instrument in an effort to better inform the process and to avoid some of the criticisms inherent in the instrument utilized during the 1995 EIS process. A link containing the relevant information and report forwarded to the Secretary of the Interior's Designee is: http://www.usbr.gov/uc/rm/amp/amwg/mtgs/11aug24/Attach_13a.pdf

CREDA suggests that additional specific information on the survey instrument is necessary for the public to provide meaningful comment on the questions posed in the FRN.

Sincerely,

Leslie James

Leslie James
Executive Director

Cc: CREDA Board