



SOUTHERN NEVADA
WATER AUTHORITY

STATE OF NEVADA



COLORADO RIVER COMMISSION
OF NEVADA

August 8, 2014

Via email to oira_submission@omb.eop.gov

Desk Officer for the Department of the Interior
Office of Management and Budget
Office of Information and Regulatory Affairs

Re: COMMENTS ON THE NATIONAL PARK SERVICE PROPOSED INFORMATION COLLECTION; COMMENT REQUEST; COLORADO RIVER TOTAL VALUE SURVEY. INFORMATION COLLECTION 1024-COLORIV.

Dear Desk Officer for the Department of the Interior:

The Department of Interior, National Park Service (NPS) posted a notice in the Federal Register on July 9, 2014 (Vol. 79, No. 131, p. 38946) seeking public comment on the development and pretesting of a final survey instrument that “may be used to evaluate future [Glen Canyon] dam operations” (Federal Register document 2014-15987). The Colorado River Commission of Nevada (CRC) and Southern Nevada Water Authority (SNWA) have been active participants in the Federal Advisory Committee Act process known as the Glen Canyon Dam Adaptive Management Program (GCDAMP) and in the development of the Glen Canyon Dam Long-Term Experimental and Management Plan (LTEMP) Environmental Impact Statement (EIS) and we appreciate the opportunity to comment on this notice. Collectively, our agencies are responsible for securing, protecting, treating, and delivering Nevada’s entitlement of Colorado River water. For the reasons discussed below, the CRC and SNWA request the Office of Management and Budget (OMB) not to approve the information collection request.

The Federal Register notice invites comments concerning several items. Our comments are limited to whether or not the collected information will have practical utility and ways to enhance the utility of the information to be collected. Please also refer to our comments submitted to NPS on November 22, 2013 on this topic.

The survey fails to adequately represent the vast complexity of resource interactions and the full extent of current and contemplated dam operations and associated management actions. Moreover, the current draft over-emphasizes recreational values as guided by the Grand Canyon Protection Act and underemphasizes the values of other stakeholders including water deliveries, hydropower, and endangered species, who are guided by additional laws, regulations, statutes, and principles. It also fails to address or take into account the authorized purposes of Glen Canyon Dam. In summary, the current survey does not accurately capture the non-use values in Glen and Grand canyons.

Given such narrowly tailored questions, the results of the survey will misrepresent the value of important resources, as well as provide false valuation of contemplated actions. This in turn will negatively impact the practical utility of the survey. The utility of the survey is furthered diminished because the NPS fails to describe how the results will be used to evaluate future Glen Canyon Dam operations and specifically how the results will be included in the Glen Canyon Dam LTEMP EIS.

Stakeholder values and resources potentially affected by the Glen Canyon Dam have been considered and evaluated for nearly 20 years through the GCDAMP. We request that the GCDAMP's Adaptive Management Work Group be given an opportunity to discuss the survey's details at their August 2014 meeting. This forum is an important collaborative resource that allows for traditionally unrepresented or underrepresented stakeholders to participate in the long-term management of the Glen Canyon Dam.

The CRC and SNWA request the OMB not to approve the information collection request. Thank you for the opportunity to comment on this Federal Register notice. If you have any questions, please contact Colby Pellegrino at 702-822-3378.

Sincerely,



Jayne Harkins, P.E.
Executive Director
Colorado River Commission of Nevada



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JH/CNP/clp

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