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Subject: Proposed Information Collection: Colorado River Total Value Study 78 FR 58344 (Sept. 23, 2013)

Western Area Power Administration (Western) is a Federal agency organized under the Department of Energy. As part of its statutory mission, Western, through its Colorado River Storage Project Management Center (CRSP MC), markets the hydroelectricity generated at the Glen Canyon Dam (GCD) and other Federal projects. CRSP power customers purchasing wholesale electricity from Western are small and medium-sized towns, irrigation cooperatives and water conservation districts, rural electrical associations, or generation and transmission co-operatives who are wholesalers to these associations, Federal facilities, universities, state agencies, and Indian tribes. Through these entities, the hydroelectric power generated at the GCD ultimately reaches approximately 5.8 million retail customers in the western United States.

Section III of the proposed information collection (IC) requests comments in four general areas:

(1) The practical utility of the information being gathered; (2) the accuracy of the burden hour estimate; (3) ways to enhance the quality, utility, and clarity of the information to be collected; and (4) ways to minimize the burden of the collection of information on respondents, including use of automated information techniques or other forms of information technology.

Through this letter, Western submits its comments on numbered items 1 and 3 of the proposed IC.

(1) The practical utility of the information being gathered.

As discussed below, the information contained in the Federal Register notice is insufficient to discern the utility of the proposed IC. Western recommends that National Park Service (NPS) clarify the scope and purpose of the IC to allow interested parties to better understand the utility of the proposed IC.

The scope and purpose of the IC is ambiguous.

The title of the proposed information collection -- Colorado River Total Value Study -- implies that the study will seek to determine the "total value" of the Colorado River whereas the abstract states that the study will be limited to determining the value U.S. residents place on the "Grand Canyon of the Colorado River riparian resource... ." Although the Grand Canyon and the Colorado River are related, the resources are not the same. Further, the use of the term "riparian resource" is ambiguous. The term has not been defined in the IC nor does it have a standard meaning. The amount of information and utility of information being proposed could vary greatly depending on the scope of the IC.

The abstract states that the proposed IC will be used to "provide park managers and NPS partners with information about the alternative *flow release scenarios from Glen Canyon Dam designed to protect canyon flora and fauna*" (emphasis added). The abstract also states that information collected will provide information for an economic analysis that will be performed which will be used to provide "one piece of information that the Secretary of Interior will use to evaluate future dam operation plans associated with the current ongoing Glen Canyon DEIS." As these two purposes are not the same, the amount of information and utility of the IC can vary greatly depending on the scope of the IC.

For these reasons, Western recommends that NPS clarify the scope and purpose of the IC to better allow commenters to determine the practical utility of the information collected.

(3) Ways to enhance the quality, utility and clarity of the information to be collected.

It is Western's understanding that NPS has already drafted a survey document that will be used as part of the IC. Western recommends that NPS share the survey document so that interested parties can better understand the quality, utility, and clarity of the information to be collected.

NPS should provide the survey document to interested stakeholders.

As discussed in section I of the IC, at least one purpose of the IC is to provide information to the Secretary of Interior for use in the ongoing Environmental Impact Statement (EIS) being conducted on the operations of the GCD. In addition, the IC is related to other environmental initiatives in the GCD including the GCD Adaptive Management Working Group (AMWG) which is a Federal advisory committee established by the Grand Canyon Protection Act to advise the Secretary of Interior on the operations of the GCD.

There are a number of resources on the Colorado River, the GCD, and the Grand Canyon National Park. Further, those resources are inextricably intertwined. As there is currently an EIS being conducted on the operations of the GCD that can materially affect any or all of the resources, one party conducting a survey or evaluation that evaluates only one resource or from one party's perspective will result in a study that is either extremely myopic and of very little value, or will result in the need for all stakeholders to create similar studies to counter the study created by NPS. Doing so, at best, would result in a duplication of efforts and would likely prove to be a waste of resources.

Because this IC is so closely related to work being performed by the Department of Interior (including NPS) on the EIS being prepared on the operation of the GCD and the work being

conducted by the AMWG, NPS should include stakeholders from those groups to ensure that all resources are properly evaluated.

Comments/Recommendations

Western proposes that:

- NPS provide the draft survey instrument in order for interested parties to provide comments on ways to enhance the quality, utility, and clarity of the information to be collected.
- NPS clarify the scope and purpose of the IC.
- NPS integrate the collection of information through the survey, the economic analysis and any analysis that is being conducted to inform the Secretary of Interior on alternative management operations and operational protocols into the Long-Term Experimental and Management Plan EIS in an open and transparent manner.

Sincerely,



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