



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.

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

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Executive Director

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October 24, 2014

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: Recreational Use Study (79 FR 50940,
August 26, 2014), NPS-WASO-EQD-SSB-16525 - INFORMATION COLLECTION ("IC")

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) of the Adaptive Management Program (AMP). CRSP power revenues provide funding for monitoring and research activities of the Grand Canyon Monitoring and Research Center (GCRMC) through the AMP, and it is CREDA's most recent understanding that funding for the Information Collection is being provided through those power revenues.

Although the IC is indicated as being a new collection, the same OMB reference number (1024) is included in the two previous Federal Register Notices. Please clarify the relationship between this IC and the prior two notices (9/23/13 and 7/9/14). CREDA submitted questions and comments on those notices, and asked clarifying questions at the recent AMWG meeting (8/26/14). If information gained from the current IC has any relationship to the information or purposes described in the prior two notices, CREDA requests that our previous comments be incorporated herein.

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. There is no reference to or information included on the specific survey(s) contents, and the described purpose of the survey is non-specific as to the intended use of the results. In order to provide meaningful comments on this IC, **CREDA requests a copy of the survey instrument(s), including supporting**

documentation, with sufficient time in advance of document submittal to the Office of Management and Budget for public comment. 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 and whether questions associated with “opinions on river management” accurately and appropriately describe Glen Canyon Dam operational alternatives. To not provide the instrument in conjunction with a request for public comment is inconsistent with the Administration’s objective of transparency in government. Finally, any opinion survey, when made public, will be scrutinized as to the structural bias of the questions, such as the use of "loaded" words, response directing phraseology, etc., along with the randomization of the sample and sample size and technique. If the survey instrument and methodology fails this scrutiny, and the results have been used in the ongoing Long-Term Experimental and Management Plan Environmental Impact Statement (LTEMP EIS) or any future NEPA process or documentation, such use could render that NEPA process and documentation fatally flawed.

If the currently proposed instrument is similar to an instrument reviewed by an ad hoc committee of the AMWG, it would 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 (SIAHG) 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. 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

As discussed at the August 27, 2014 AMWG meeting, the AMWG recommended, and CREDA concurs, that the AMWG’s Socio-Economic Ad Hoc Group (SEAHG) be involved in this process, to help inform the survey in order that the results of updating 1995 recreational use data be beneficial to the AMP and the NPS

Sincerely,

Leslie James

Leslie James
Executive Director

Cc: CREDA Board

