



UPPER COLORADO RIVER COMMISSION

355 South 400 East • Salt Lake City • Utah 84111 • 801-531-1150 • FAX 801-531-9705

October 20, 2014

--SENT VIA E-MAIL--

Mr. Bret Meldrum, Chief
Social Science Program
National Park Service
1201 Oakridge Dr
Fort Collins, CO 80525-5596
Bret_Meldrum@nps.gov

Ms. Phadrea Ponds
Information Collection Coordinator
National Park Service
1201 Oakridge Dr.
Fort Collins, CO 80525
pponds@nps.gov

Subject: Information Collection 1024 – NEW

Mr. Meldrum and Ms. Ponds:

The Upper Colorado River Commission ("UCRC," Commission) appreciates the opportunity to comment on the National Park Service's *Proposed Information Collection: Recreational Use Study* (79 Fed. Reg. 50940 (August 26 2014)). These comments also reflect the collective view of the four Upper Division States' representatives to the Commission. The Federal Register Notice (FRN) invites comment on: (1) Whether or not the collection of information is necessary, including whether or not the information will have practical utility; (2) The accuracy of the estimate of the burden for the collection of information; (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.

The UCRC is an interstate water administrative agency established by Congress to administer water from the Colorado River allocated by compacts to the Upper Division States of Colorado, New Mexico, Utah and Wyoming and to provide water released in accordance with the 1922 Colorado River Compact to the Lower Division States of Arizona, California and Nevada. The UCRC is comprised of one representative appointed by the governor of each Upper Division State and one member appointed by the President to represent the United States. The Commission is a cooperating agency for the Glen Canyon Dam Long-Term Experimental and Management Plan (LTEMP) Environmental Impact Statement (EIS) and is vitally interested in the waters of the Colorado River Basin.

The proposed Recreational Use Study is not necessary and would be of little or no practical utility because it is duplicative of similar ongoing efforts and studies. First, the Technical Work Group, a subgroup of the Glen Canyon Dam Adaptive Management Program (GCDAMP), established a Socio-Economic Ad Hoc Group (SEAHG) tasked in part to identify, develop and address informational needs related to Glen Canyon Dam operations and the Colorado River in Grand Canyon. The SEAHG is overseeing preparation of a socio-economic study to

determine the economic value of the Grand Canyon to society as a whole (non-use value) as well as its economic importance to the region. Second, the National Park Service (NPS), along with numerous stakeholders and cooperating agencies, is in the midst of the LTEMP EIS process. The LTEMP EIS process is examining the many resource values of the Colorado River below Glen Canyon Dam and will necessarily include a full economic analysis of those resources, including recreation uses. Finally, the NPS recently submitted to OMB a request to conduct a "Colorado River Total Value Survey," ostensibly to survey public values associated with the Colorado River in Grand Canyon, including recreational uses of the river below Glen Canyon Dam.

Not only would the proposed Recreational Use Study be duplicative in many respects, it could also undermine the ongoing efforts of the SEAHG, the LTEMP EIS, its cooperating agencies and stakeholders, and the Colorado River Total Value Survey, depending on how the Recreational Use Survey would move forward. There is a genuine risk that the proposed NPS effort, if conducted simultaneously with the other efforts already underway, would cause confusion and be an ultimate waste.

The Recreational Use Study would also lack any practical utility due to its narrow focus and oversimplification of a very complex issue. The survey seeks recreation-based opinions on river management from the base of Glen Canyon Dam to Lees Ferry only. A study focused on a single resource in a limited stretch of the area downstream of Glen Canyon Dam would be of little use to inform Dam operations that must consider many resources.

If NPS conducts the survey, it must fairly portray that operations over the past 15 years have often been for experimental purposes. The survey must also recognize the complex laws and components associated with operation of Glen Canyon Dam. The survey would be unrealistic and of no use if it did not fairly reflect the robust nature and statutory purposes and requirements of Glen Canyon Dam operations. For these reasons, the UCRC recommends that all surveys involving the Grand Canyon and Glen Canyon Dam operations be fully coordinated with the GCDAMP, including all its stakeholders, in addition to the U. S. Geological Survey and Grand Canyon Monitoring and Research Center.

Finally, if the survey moves forward, NPS should enhance the quality, utility and validity of the collected information by consulting and coordinating with both the GCDAMP SEAHG and the agencies preparing the LTEMP EIS and their cooperators to develop an adequate survey and supporting materials and ensure that the NPS efforts are not duplicative, confounding or wasteful. To date, NPS has not consulted with or offered the GCDAMP or LTEMP EIS cooperators the opportunity to comment on any aspect of the proposed survey.

Thank you for your consideration of the above comments. Do not hesitate to contact me if you have any questions.

Very truly yours,



Don A. Ostler, P.E.

Executive Director and Secretary