Supporting Statement A A Survey of Direct Recreational Uses Along The Colorado River OMB Control Number 1024-NEW

Terms of Clearance. None. This is a new collection.

General Instructions

A completed Supporting Statement A must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified below. If an item is not applicable, provide a brief explanation. When the question "Does this ICR contain surveys, censuses, or employ statistical methods?" is checked "Yes," then a Supporting Statement B must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

Specific Instructions

Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

The National Park Service (NPS) and the U.S. Geological Survey's Grand Canyon Monitoring and Research Center requested the University of Montana to conduct this study to understand the social and economic impacts of water levels on recreation uses of the Colorado River, specifically the areas from Glen Canyon Dam to the head of Lake Mead. This area is a nationally important recreation and conservation resource and is considered to have significant water-related visitor use. The over 200 mile long stretch of free flowing river from Lee's Ferry (10 miles below Glen Canyon Dam) to the head of Lake Mead is likely the highest profile whitewater flat trip in the country. The Colorado River is a highly regulated river system whose water and water flows is fully allocated, and the results of the proposed study will be used to provide information to agency managers concerning the relationship between river water flows, recreational use and trip values.

The quality of visitor trips, values, and uses directly tied to water levels in this area have not been comprehensively studied since 1994. We are requesting approval to administer two surveys (CV and

conjoint) to two user groups (anglers and whitewater floaters) recreating in the areas from Glen Canyon Dam to the head of Lake Mead. Given the substantial changes in river flow management and trout abundance and distribution, this proposed study will provide estimates concerning the impact of water levels on recreational visitor trip valuation and recreational use of the Colorado River. The survey will be used to provide empirical data that will help managers and planners understand the impacts of water levels on visitor expenditures. The information will also be used to understand the costs and benefits of selected alternative management scenarios for Colorado River water.

This study is needed to assist the NPS and USGS managers with their understanding of how alternative water management strategies could affect recreational uses and values.

Legal Justification:

- The National Park Service Act of 1916, (38 Stat 535, 16 USC 1, et seq.) requires that the National Park Service (NPS) preserve the national parks for the use and enjoyment of present and future generations. At the field level, this means resource preservation, public education, facility maintenance and operation, and physical developments that are necessary for public use, health, and safety.
- National Environmental Policy Act, 1969, (42 U.S.C. § 4321) <u>require visitor use data in impact</u> <u>assessment of development on users and resources as part of each park's general management</u> plan.
- The Grand Canyon Protection Act, 1992 (1805(b)). long-term monitoring of Glen Canyon Dam shall include any necessary research and studies to determine the effect of the Secretary's actions under section 1804(c) on the natural, recreational, and cultural resources of Grand Canyon National Park and Glen Canyon National Recreation Area.
- Indicate how, by whom, and for what purpose the information is to be used. Except for a new
 collection, indicate the actual use the agency has made of the information received from the
 current collection. Be specific. If this collection is a form or a questionnaire, every question
 needs to be justified.

The survey instruments are designed to collect information from two user groups participating in water-based recreation along the Colorado River from Glen Canyon Dam to Lake Mead. Each year, the Arizona Fish and Game Department (AZFGD) conducts a creel survey of anglers fishing between Lees Ferry to Glen Canyon Dam river. This survey, in part, collects contact information, selected demographics, and

trip characteristics. We will use this list of names and contact information to randomly select the respondents for this collection.

The names of whitewater floaters will be randomly selected from NPS visitor logs of participants in whitewater float trips over the previous 12 months. A 12 month period of visitation is chosen in order to 1) capture potentially differing floater population segments in different times of the year (for example, winter vs. summer), and 2) minimize potential recall bias associated with sampling visitors from previous years. Additionally, while precipitation and reservoir levels vary significantly from year to year, the streamflow from Glen Canyon Dam releases has been generally, consistent from 2012 through the present in terms of average daily flow levels. The choice of a 12 month period for our pool of potential respondents is further discussed in Supporting Statement B. One-half of visitors for each survey will receive a survey containing contingent valuation (CV) questions with trip and flow valuation questions. The other half will receive a version of the survey using the conjoint or "Choice" question format. A description of the both surveys is outlined below and the justifications for the questions are highlighted in shaded boxes on the survey instruments.

The current proposed survey will not be used in the LTEMP process due to incompatible timelines.

1: White Water Floater Survey

This will be a survey of recreationists that *floated* the stretch of the Colorado River from Lee's Ferry downstream to the head of Lake Mead within the last 12 months. A mail-back questionnaire will be used to gather information about: trip characteristics, trip expenditures, and the relationship between river flow levels and the values floaters place on their trips. The valuation questions in this survey will be presented in two alternate survey versions: 1) Contingent Valuation (CV) Survey and 2) Conjoint Survey. Fifty percent of potential respondents will be randomly selected to receive each version of the survey.

2: Angler Survey

This will be a survey of recreationists *fishing* the stretch of the Colorado River from the base of Glen Canyon Dam downstream to just below Lee's Ferry. We will gather information about: trip characteristics, trip expenditures, and the relationship between river flow levels and the values anglers place on their trips. The valuation questions in this survey will be presented in two alternate versions:

1) Contingent Valuation (CV) Survey and 2) Conjoint Survey. Fifty percent of potential respondents will be randomly selected to receive each version of the survey.

Researchers from the University of Montana, Missoula, MT will administer and collect the surveys associated with this submission. The results will be used to demonstrate the relationship between river water flows, recreational use, and trip values. The study results will be published by USGS and NPS in the form of a final comprehensive technical report available for use by Federal and State policy makers and the general public. Aspects of the study will also be submitted for publication in at least one peer reviewed publication, in order to highlight the contribution this study makes to the greater body of research on the relationship between water levels and recreational use and values.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden and specifically how this collection meets GPEA requirements.

This data collection will not use electronic techniques.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

There is no known duplication of efforts. A thorough review of previous survey efforts in this river corridor as well as a comprehensive analysis of existing data gaps was conducted by the principal investigator to define the scope of this collection.

The Proposed Glen Canyon Angler and Grand Canyon Whitewater boater surveys are designed to only examine direct use values associated with angling and whitewater floating in the target river stretches. This is distinct from the total value (passive use value) survey of national households being conducted to inform the LTEMP process. There is no overlap in target population, or value component examined between the two surveys. No aspect of non-use (passive use) value will be addressed in the current proposed angler and whitewater surveys.

If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

This data collection will not impact small businesses or other small entities.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

Information on the relationships between the use levels, expenditures, and net economic values within the Colorado River corridor downstream of Glen Canyon Dam to Lake Mead, is more than 25 years old. If the proposed study is not conducted, agencies will be forced to make management decisions based on extremely outdated information concerning regional spending, and visitor use and enjoyment.

- 7. Explain any special circumstances that would cause an information collection to be conducted in a manner:
 - requiring respondents to report information to the agency more often than quarterly;
 - requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
 - requiring respondents to submit more than an original and two copies of any document;
 - requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;
 - in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study;
 - requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
 - that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
 - requiring respondents to submit proprietary trade secrets, or other confidential information, unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

Following the Dillman Method (2007)¹, we will ask respondents to respond to the survey within 2 weeks of receipt.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the

¹ Dillman, D.A., 2007. <u>Mail and Internet Surveys: The Tailored Design Method</u>, second ed. Hoboken, John Wiley Co., New Jersey (2007 Update).

information collection prior to submission to OMB. Summarize public comments received in response to that notice and in response to the PRA statement associated with the collection over the past three years, and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every three years — even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

A notice was published in the *Federal Register* on August 26, 2014 (79 FR 50940) stating that we intended to request OMB approval of an information collection titled: A *Survey of Direct Recreational Uses along the Colorado River*. In this notice, we solicited public comment for 60 days ending October 27, 2014.

As a result of the Federal Register notice we received four comment letters. The specific comments and our responses on how we considered the comments (in italics) are detailed in Attachment A to this Supporting Statement.

In addition to comments received from the 60-day FR notice, the individuals listed below provided editorial suggestions and feedback concerning the clarity of the procedures and approximate length of time it would take to complete this process, based on their previous experiences with surveys similar to this. We incorporated their suggested edits to improve the final instrument. The reviewers provided comments that indicated that the instruments were straightforward and that the instructions were very helpful. The reviewers concurred with our estimated burden time to complete each version of the survey instruments.

Peer reviewer comments	Actions taken
The length of the survey is burdensome.	Deleted questions of a lesser priority throughout

		the survey.
Care should be taken to not present	•	Reworded survey text viewed as potentially
statements that could be viewed as potentially		biasing.
biasing subsequent responses.		
Number of choice question occasions may	•	Reviewed similar examples of choice survey
exceed respondent willingness to participate.		administration, reduced number of choice
		occasions where possible.

Peer Reviewers

- Dr. David Harpman, U.S. Bureau of Reclamation Denver, CO
- Margo Selig, U.S. Bureau of Reclamation Boulder City, NV
- 3. Brooke Miller-Levy, U.S. Bureau of Reclamation Salt Lake City, UT
- 9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No payments or gifts will be provided to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

We will not provide any assurances of confidentiality. Names and contact information (e.g., street address) will be maintained for follow-up purposes only. Respondent names or addresses will not appear in any of our reports or findings.

The use of the names provided by the National Park Service is covered by the National Park Service System of Records Notice (SORN) Special Use Permits-Interior, NPS-1. All names and identifying information are protected by the Privacy Act of 1974. All responses will be anonymous and the respondent's names will never be associated with their responses. The database containing all contact information will be completely destroyed at the conclusion of this information collection.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the

specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

No questions of a sensitive nature will be asked.

- 12. Provide estimates of the hour burden of the collection of information. The statement should:
 - Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates.
 Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.
 - If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.
 - Provide estimates of annualized cost to respondents for the hour burdens for collections of
 information, identifying and using appropriate wage rate categories. The cost of contracting
 out or paying outside parties for information collection activities should not be included here.
 Instead, this cost should be included under "Annual Cost to Federal Government."

This collection will involve two mail-back survey instruments. We assume that respondents will spend 20 minutes completing either survey; this includes the time to read all correspondences and instructions included within the survey package. We estimate that there will be total 2,340 respondents from the total sample of 3,600 potential respondents (65% response rate), and the total annual burden for collection will be 780 hours (Table 1). Our estimate is based upon our experience with similar collections. Surveys of interested user groups generally have significantly higher response rates than general household surveys. For example, a 2011 survey of Great Salt Lake waterfowl hunters (Duffield, Neher, and Patterson 2011) had a 65% overall response rate.

<u>White Water Floater Survey</u>: We will mail 2,850 surveys to a random sample of visitors from a visitor list of whitewater floaters supplied by the NPS. We expect to receive a 65% (n=1,852) response rate for this survey.

<u>Angler Survey</u>: We will mail 750 surveys to a random sample of adult anglers (18 years and older) taken from the AZFGD creel survey list. We expect that 65% (n=488) will return the completed survey.

We estimate the total dollar value of the burden hours to be \$26,122. We multiplied the estimated burden hours by \$33.49 (for individuals or households). This wage figure includes a benefits multiplier and is based on the National Compensation Survey: Occupational Wages in the United States published by the Bureau of Labor Statistics Occupation and Wages, (BLS news release USDL-15-1132 for Employer Costs for Employee Compensation— March 2015 at - http://www.bls.gov/news.release/pdf/ecec.pdf, dated June 10, 2015).

Individuals and Households						
	Annual	Annual	Estimated	Total	Dollar Value	Total Dollar
	Number	Number	Completion	Annual	of Burden	Value of
Activity	of	of	time per	Burden	Hour	Annual
	Contacts	Responses	Response		Including	Burden
			(minutes)	(Hours)	Benefits	Hours*
Completing Survey (total)						
White Water Floaters	2,850	1,852	20	617	\$33.49	\$20,663
Glen Canyon Anglers	750	488	20	163	\$33.49	\$5,459
TOTAL	3,600	2,340		780		\$26,122

- 13. Provide an estimate of the total annual non-hour cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)
 - The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.
 - If cost estimates are expected to vary widely, agencies should present ranges of cost burdens
 and explain the reasons for the variance. The cost of purchasing or contracting out
 information collection services should be a part of this cost burden estimate. In developing
 cost burden estimates, agencies may consult with a sample of respondents (fewer than 10),
 utilize the 60-day pre-OMB submission public comment process and use existing economic or

- regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices

There are no non-hour burden costs resulting from the collection of this information.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

The total annual cost to the Federal Government is \$256,755. This includes the cost to the Federal Government for salaries and benefits for administering this information collection (\$15,451), nonfederal staff and operational expenses (\$241,304). The tables below shows Federal staff and grade level associated with this information collection. We used the Office of Personnel Management Salary Table 2015-DEN

(http://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2015/DEN_h.pdf) to determine the hourly rate. We multiplied the hourly rate by 1.5 to account for benefits (as implied by the BLS news release USDL-10-1687). Operational expenses are listed in the following table.

Federal Employee Salaries and Benefits

Position	Grade/ Step	Hourly Rate	Hourly Rate incl. benefits (1.5 x hourly pay rate)	Estimated time (hours)	Annual Cost
Economist/Program Manager	13	\$42.92	\$64.38	240	\$15,451

Non-Federal Employee and Operational and Expenses

Position	Hourly	Total	Total

	Cost	Hours	Cost
Principal Investigator	\$143.45	592	\$84,923
Statistician	\$84.69	80	\$6,775
Economist	\$40.50	960	\$38,880
4 Research Assistants	\$16.81	520	\$8,741
Operational Expenses			
Travel			\$11,496
Subcontracts			\$6,250
Printing and Mailing			\$48,300
Indirect Cost (University of Montana)			\$35,939
		Total	\$241,304

15. Explain the reasons for any program changes or adjustments in hour or cost burden.

This is a new collection.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

Data analysis will include frequency distributions, cross tabulations, and multivariate analysis. The final deliverables will include a published report submitted to the NPS and USGS. A journal article will be also be prepared for submission to a peer reviewed economics journal. The data will be presented in a usable format to use as a reference for designing cost effective and functional management applications.

The table below presents a time schedule for this surveying effort.

	Begins	Ends
Survey Information Collection	April 1, 2015	May 30, 2016
Data Analysis	September 2015	November 2016
Report Preparation and Publication	December 2016	+3 months

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

We will display the OMB control number and expiration date on the information collection instruments associated with this submission.

18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

There are no exceptions to the certification statement.

Attachment A

Cover letter containing the Agency's collective response to all comments received concerning this Information Collection Request

The Study Description

The proposed information collection is associated with a study entitled <u>A Survey of Direct Recreational Uses Along The Colorado River</u>. This study is an academic research project originally funded by the NPS with current ongoing funding by the USGS GCMRC. The study addresses theoretical and academic issues, and is separate and distinct from the on-going LTEMP process on the Colorado River. The timeframe of the current collection is incompatible with the LTEMP process and the results of the current collection are not intended to inform the LTEMP.

Study Timeline

Substantial work was accomplished on the current IC design in 2011 under funding by NPS. As noted below, extensive consultation and comment solicitation was completed in August 2011 with the Survey Instrument ad hoc Group (SIAHG), a subgroup to the Technical Workgroup. Following the this consultation and response to the comments of SIAHG in 2011, funding for the project was exhausted, and no work was performed or modifications made to the survey until following the resumption of funding under GCMRC, and solicitation of comments under the August 26, 2014 60-day FR notice.

On August 26, 2014 a 60-day Federal Register notice (FRN) of proposed information collection (IC) for the recreational use study was published.² The intent of this notice was to invite comments concerning the necessity, burden estimate and ways to enhance or streamline the IC. The Grand Canyon Monitoring and Research Center's response to FRN (8/26/201) comments are included below.

The Survey Instrument ad hoc Group (SIHAG), a subgroup to the Technical Workgroup, reviewed the recreational use study surveys in 2011. The SIAHG's report and recommendations were reviewed and considered by the Adaptive Management Workgroup on August 24-25, 2011. At that time, the NPS also reviewed and considered the SIAHG's recommendations. GCMRC's response to the SIAHG's recommendations is included below. The survey instruments also received review from economists and other technical staff at the Bureau of Reclamation, NPS and GCMRC. Survey instruments are available for public review, concurrent with OMB review, as part of the second notice in the Federal Register

² The NPS is administering OMB review of the recreational use study. GCMRC is leading the recreational use study as detailed in Project 13 in the 2015–2017 TWP.

Section 1: Response to Public Comments Received during the Recreational Use Study 60-day Federal Register Notice (published on August 26, 2014) (Responses shown in italics)

Letter from Upper Colorado River Commission (October 20, 2014)

• Comment 1: Duplication with other federal efforts and studies

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.

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.

The recreational use study is research detailed in Project 13 of the Glen Canyon Dam Adaptive Management Program Triennial Budget and Work Plan— Fiscal Years 2015—2017. The NPS is administering the OMB review. GCMRC is undertaking the research. There are no duplicative research efforts outside of GCMRC.

Comment 2: Duplication with LTEMP EIS

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.

Information from the recreational use study is not intended to be utilized in the LTEMP EIS due to incompatible project timelines. The recreation economics analysis in the LTEMP EIS is utilizing information from the Bishop et al. (1987) study. The recreational use study initiated by GCMRC is intended to update the Bishop et al. (1987) study.

Comment 3: Duplication with NPS's "Colorado River Total Value" survey

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.

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 use of the river below Glen Canyon Dam.

The recreational use study will identify angler and whitewater floater preferences for trip attributes (e.g., beaches, crowding, safety), regional expenditures (e.g., lodging, retail purchases), and non-market direct use economic values. The "Colorado River Total Value", or non-use, survey will not collect this detailed information regarding recreational use below GCD.

Comment 4: Recreational use study focus too narrow

The Recreational Use Study would also lack any practical utility due to its narrow focus and oversimplification of a very complex issue.

The recreational use study is consistent with the "Recommended Information Needs and Program Elements for a Proposed Socioeconomic Program", approved by the AMWG on February 23, 2012. Recreation information needs RIN 1 and RIN 2 specify the need to identify total market (assumed regional expenditures) and non-market values of recreational uses of the Colorado River Ecosystem downstream from GCD, including angling in GCNRA below GCD and whitewater floating in GCNP. The information needs identified by the SEAHG collectively lead to better recourse management and decision making.

Comment 5: Lack of GCDAMP stakeholder involvement

For these reasons [complex laws and components associated with the operation of Glen Canyon Dam], 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 the Grand Canyon Monitoring and Research Center.

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.

The survey instruments were reviewed in 2011 by the Survey Instrument ad hoc Group (SIAHG), a sub group to the Technical Workgroup. The NPS and GCMRC reviewed SIAHG's recommendations and made necessary minor changes to the surveys.

Letter from Colorado River Energy Distributors Association (October 24, 2014)

• Comment 1: Duplication with NPS's "Colorado River Total Value" survey

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.

The recreational use study is not related to the two Federal Register notices dated 9/23/13 and 7/9/14, concerning the NPS's "Colorado River Total Value" survey. The recreational use study is a new collection and did not receive an OMB reference number. The first four numbers (1024) in the requested subject line reference to use in electronic communication have been assigned to all recent NPS information collection requests. It is the sequence of numbers that follow '1024' that identify the OMB reference number.

Comment 2: Request of survey instrument for review

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 comments.

The survey instruments will be available for public comment during the 30-day Federal Register notice, concurrent with OMB review. The survey instruments were reviewed by the Survey Instrument ad hoc Group (SIAHG), a sub group to the Technical Workgroup, in 2011. The NPS and GCMRC reviewed SIAHG's recommendations and made necessary minor changes to the surveys.

Letter from Department of Energy (October 27, 2014)

• Comment 1: Request of survey instrument for review

The survey instrument be available for public review and comment.

The survey instruments will be available for public comment during the 30-day Federal Register notice, concurrent with OMB review. The survey instruments were reviewed by the Survey Instrument ad hoc Group (SIAHG), a sub group to the Technical Workgroup, in 2011. The NPS and GCMRC reviewed SIAHG's recommendations and made necessary minor changes to the surveys.

• Comment 2: Coordinate recreational use study with the GCDAMP's SEAHG

The scope and purpose of the proposed information collection be clarified and comport with the recommendations of the Glen Canyon Adaptive Management Program's Socioeconomic ad hoc Group.

The recreational use study is consistent with the "Recommended Information Needs and Program Elements for a Proposed Socioeconomic Program", approved by the AMWG on February 23, 2012. Recreation information needs RIN 1 and RIN 2 specify the need to identify total market (assumed regional expenditures) and non-market values of recreational uses of the Colorado River Ecosystem downstream from GCD, including angling in GCNRA below GCD and whitewater floating in GCNP. The recreational use study will identify angler and whitewater floater preferences for trip attributes (e.g., beaches, crowding, safety), regional expenditures (e.g., lodging, retail purchases), and non-market direct use economic values.

Comment 3: Coordination with LTEMP EIS

Integration of any information obtained or developed through the PIC into the LTEMP EIS process be done in an open and transparent manner.

Information from the recreational use study is not intended to be utilized in the LTEMP EIS due to incompatible project timelines. The recreational use study is research being undertaken by GCMRC as detailed in the 2015–2017 TWP. Utilization of information from the recreational use study by other federal agencies is outside the scope of this information collection request.

Letter from Irrigation & Electrical Districts Association of Arizona (October 27, 2014)

Comment 1: Request of survey instrument for review and coordination with LTEMP EIS

Without opportunity to review it [recreational use study], it itself becomes the point of controversy in the EIS.

The survey instruments will be available for public comment during the 30-day Federal Register notice, concurrent with OMB review. Information from the recreational use study is not intended to be utilized in the LTEMP EIS due to incompatible project timelines.

Letter from Jean Pubic (August 29, 2014)

Response not include in this communication.

Section 2: Response to <u>WAPA comment letter of May 21, 2015</u> and associated response to SIAHG's Proposed New Questions or Information Needs for the Recreational Economic Surveys

COMMENT: *Recommendations*: Western concurs with the recommendations of the SEAHG. Western applauds the NPS for having the GCMRC do the analysis. This analysis is part of Project 13, and the GCMRC has been coordinating with the SEAHG regarding the development and implementation of the analysis. Western agrees with this approach.

Since the SEAHG and other GCDAMP stakeholders are the most affected and have the most interest and knowledge regarding the effects of the operations of the GCD, the details regarding the survey and the implementation of the research should be coordinated with the SEAHG. Specifically, we recommend that the final survey instruments be discussed and coordinated with the SEAHG. Western recommends that GCMRC meet with the SEAHG and discuss the current version of the survey and make changes, if necessary and desired, prior to OMB's final approval of the survey instrument.

RESPONSE:

The AMWG reviewed and considered recommendations made by the Survey Instrument ad hoc Group (SIAHG) on angler and whitewater floater surveys in 2011 that were developed by the National Park Service (NPS) as part of a broader NPS economic research agenda.

Funding was lost for the project in late 2011, and no additional work or changes to the documents or work plan were made until the response to additional comments collected under the August 2014 60-day FR notice.

The following are written responses to the SIAHG's proposed information needs and questions for consideration:

1) What is the current total annual market value³ of the Lees Ferry trout fishery (market and nonmarket) to the regional community and what are its components, i.e. hotel and restaurant, guides, retail purchases, etc? What are its non-use values?

The recreational use study will identify angler and whitewater floater preferences for trip attributes (e.g., beaches, crowding, safety), regional expenditures (e.g., lodging, retail purchases), and non-market direct use economic values. Non-use values are not included in the recreational use study.

2) What is the current total annual market value of the Glen Canyon Smooth Water Half Day Trips, private rafters, canoeists, kayakers, etc? What are their non-use values?

The survey instruments will not include recreational floating in GCNRA. Past research has indicated that whitewater floaters' non-market direct use economic values do not vary significantly with alternative dam operations. Due to budgetary considerations, only anglers in GCNRA below GCD and whitewater floaters in GCNP will be surveyed.

3) How have total annual use and market values for the Lees Ferry trout fishery and recreational boating changed for Pre-Rod and Post-Rod periods?

The survey of anglers in GCNRA below GCD and whitewater floaters in GCNP will identify regional economic expenditures and non-market direct use economic values for post-ROD conditions. The results from the Bishop et al. (1987) research and the current recreational use study will allow some inferences to be made about pre and post-ROD changes in regional economic expenditures.

4) Do Lees Ferry recreational boaters and sports fishers express a significant difference in willingness to pay under differing flow conditions?

The survey of anglers in GCNRA below GCD and whitewater floaters in GCNP will identify differences in non-market direct use economic value concerning differing flow conditions, similar to the research by Bishop et al. (1987).

5) How has demand for Lees Ferry and Grand Canyon recreational boating (including rafting to Lake Mead) and Lees Ferry sport fishing changed over the period Pre and Post Rod?

The survey of anglers in GCNRA below GCD and whitewater floaters in GCNP will identify non-market direct use economic values for post-ROD conditions. The results from the Bishop et al. (1987) research and the current recreational use study will allow some inferences to be made about pre and post-ROD changes in demand.

³ The assumption is made that 'market values' refer to regional expenditures made by recreationists. Changes in regional recreational expenditures are a necessary component of a regional economic impact analysis.

- 6) How has crowding, camp size, multiple campsites in an area, etc affected the Grand Canyon experience and expressed values?
 - The whitewater floater survey in GCNP will identify current preferences for trip attributes (e.g., beaches, crowding, solitude), allowing for inferences about the relationship between trip attributes and preferences and non-market direct use economic values.
- 7) How has Native American use of the Lees Ferry trout fishery changed from the period Pre and Post Rod?
 - The survey of anglers in GCNRA below GCD will record demographic information on race and ethnicity. To the limited extent that pre-ROD information exists, survey results will allow for comparison between pre and post-ROD Tribal use of the Lees Ferry fishery.
- 8) Regarding the Grand Canyon rafting experience, can questions be added to capture more clearly why people take this specific trip, isolating specifically trip attributes like unique wilderness experience, solitude, scenic beauty, etc?
 - The whitewater floater survey in GCNP includes questions about current preferences for trip attributes (e.g., beaches, natural setting, safety).
- 9) How does the social benefit of the Lees Ferry trout fishery differ for walk-in only and boating anglers?
 - The angler survey in GRNRA below GCD will differentiate between walk-in and boating anglers and in non-market direct use economic values.
- 10) Should case scenarios for contingent valuation more closely approximate expected real variance in operations?
 - The initial contingent valuation question in the angler survey in GRNRA below GCD and whitewater floater survey in GCNP identifies non-market direct use economic value. This metric is reflective of GCD operations experienced during the recreational activity. Questions concerning alternative flow regimes are necessary to answer question 4 in the "Proposed New Questions or Information Needs for the Recreational Economic Survey, from the SIAHG" (above) and the recreation information need RIN2 in the "Proposed Information Needs and Program Elements for a Proposed Socioeconomic Program" (as approved by AMWG on February 23, 2012.
- 11) Collect data on alternatives for the users. Questions should be included as to what are the responder's three favorite fishing locations in the southwest starting with the most favored. For those ranked above the Colorado River, have them list the major attractions to them.

Alternative angling opportunities to the Less Ferry fishery are important to consider. However, the information is not essential to estimating the non-market direct use economic value of the recreational activity to current users. This question was not included in the survey in order to keep the survey instrument to an appropriate length.

12) Have you considered survey information that should be collected from those not necessarily fishing the Colorado River? Surveys could include regional groups. There are at least 7 active fly fishing groups in Arizona. There are also other fishing and outdoor groups. This provides input on economic lost value.

Surveying Lees Ferry anglers that currently use the resource provides up-to-date information on non-market direct use economic value and how this value changes with trip attributes (e.g., flow, rainbow trout condition). While results of the angler survey will provide insights into the economic impact of varying resource attributes it is beyond the scope of this project to determine how demand for angling at Lees Ferry changes over time. Identifying demand for angling at Lees Ferry as resource attributes and other determinants of demand vary would be required to estimate how change in angler participation impacts economic value.

13) The sampling strategy for the Angler Survey appears to be exclusively focused on fishing users encountered on the water at Lees Ferry. Have you considered the value of adding a broader sampling frame component to include "licensed anglers" to help assess perceived opportunity value foregone?

Surveying Lees Ferry anglers that currently use the resource provides up-to-date information on non-market direct use economic value and how this value changes with trip attributes (e.g., flow, rainbow trout condition). While results of the angler survey will provide insights into the economic impact of varying resource attributes it is beyond the scope of this project to determine how demand for angling at Lees Ferry changes over time. Identifying demand for angling at Lees Ferry as resource attributes and other determinants of demand vary would be required to estimate how change in angler participation impacts economic value.

14) Should case scenarios for contingent valuation more closely approximate current on-the-water experiences associated with operations?

The initial contingent valuation question in the angler survey in GRNRA below GCD and whitewater floater survey in GCNP identifies non-market direct use economic value. This metric is reflective of GCD operations experienced during the recreational activity.

- 15) The sampling strategy for on the water users should ensure that interviewers reach and qualify the walk-in angler, i.e. three types of anglers exist as follows.
 - a. Those that visit the walk-in areas only.
 - b. Those that boat up-river for angling only.
 - c. Those that both visit the walk-in areas and boat up-river for angling purposes.

The angler survey in GRNRA below GCD includes sampling at the Lees Ferry access point (boat ramp), walk-in access below and above the Paria and angler access point downstream from the Paria. Differences in preferences and non-market direct use economic values between these different angling groups will be assessed.