



United States Department of the Interior



BUREAU OF LAND MANAGEMENT

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In Reply Refer To:

8300 (930)

April 17, 2014

Mr. Mike Eisenfeld
New Mexico Energy Coordinator
San Juan Citizens Alliance
P.O. Box 6655
Farmington, New Mexico

Dear Mr. Eisenfeld:

I have been asked to respond to your Information Quality Act request dated February 19, 2014 on the Glade Run Recreation Area (GRRR) Resource Management Plan Amendment/Environmental Assessment (RMPA/EA).

Your request states that the BLM has not provided any basis for asserting the quality of the data used for analysis in the GRRR RMPA/EA and that there are numerous discrepancies and contradictions in data associated with information. Below we list each of the categories of information that you have challenged, and provide as much information as possible given the non-specific nature of the challenge.

1. *Surface disturbance associated with oil and gas activities in the GRRR.*

BLM followed data standards for oil and gas development, including information on size, facilities, roads, and pipelines. These data standards can be found in BLM regulations at 43 CFR 3160 and 3180. BLM also followed data standards for right-of-way facilities, which can be found at 43 CFR 2800, 2880, 2740, and 2912. More information on BLM energy and right-of-way policy, including applicable handbooks and manuals, can be found at <http://www.blm.gov/wo/st/en/prog/energy.html> and <http://www.blm.gov/wo/st/en/prog/more/lands.html>. BLM also followed oil and gas exploration and development operating standards and guidelines, as described in the 2007 Surface Operating Standards and Guidelines for Oil and Gas Exploration and Development (4th Edition) (Gold Book).

2. *Travel management data*

BLM collected travel and transportation data according to the guidance in BLM's Travel and Transportation Manual (MS-1626) as well as BLM's Travel and Transportation Handbook (H-8342). Information related to the designated use for each route within the GRRR is contained within Appendix F of the Draft GRRR RMPA/EA.

3. *Closed routes and closed right-of-ways:*

As stated above, BLM collected travel and transportation management data according to Manual MS-1626 and Handbook H-8342. Information relating to closed rights-of-ways was taken from BLM's LR2000 website at <http://www.blm.gov/lr2000>.

4. *Land health standards and sustained yield data for multiple use resources:*

This request is vague, which makes a targeted response difficult. There are numerous resource specific manuals, handbooks, technical notes, and procedures that are utilized to assess land health standards, including BLM's Land Health Manual (MS-4180) and Rangeland Health Standards Handbook (H-4180-1). Both documents can be found on BLM's website at <http://www.blm.gov/wo/st/en/info/regulations.html>. In addition to the manual and handbook, other reference material includes the Nevada Rangeland Monitoring Handbook (2nd Edition), Educational Bulletin 06-03 (2006); BLM Core Terrestrial Indicators and Methods, Technical Note 440 (August 2011); Utilization Studies and Residual Measurements, Interagency Technical Reference (1996); and Interpreting Indicators of Rangeland Health (Version 4), Technical Reference 1734-6 (2005).

5. *Minimization criteria:*

Similarly, this request is vague, making a targeted response difficult. BLM uses designation criteria described at 43 CFR 8342.1. Additional planning criteria, including those intended to minimize impacts in the GRRRA, is described at Section 1.8 and Appendix A for route specific criteria of the Draft GRRRA RMPA/EA.

6. *Monitoring data used to comply with the 2003 Farmington Resource Management Plan, as amended, and associated monitoring reports:*

Without specifically identified technical references, BLM can provide only general information for each discipline. If you identify with greater specificity the monitoring data you are seeking, then we could provide more specific responses. The majority of the BLM's monitoring information is publically available in the form of technical reports or educational bulletins.

7. *Archaeological resources, including areas identified as eligible under the National Register of Historic Places and areas that have existing Class III cultural resource inventories:*

Cultural resource data was collected to the applicable BLM manual (M-8100-The Foundation for Managing Cultural Resources) and information submitted in accordance with New Mexico Cultural Resources Information System (NMCRIS) guidelines. Requests for NMCRIS data can be made to NMCRIS. Additional information related to cultural data is considered confidential and proprietary due to the sensitive nature and cultural significance of the resource and cannot be released to the public.

Above, we have made our best attempt to provide you with responsive information where possible. However, your Information Quality Act request is vague and broad, making detailed responses difficult. Furthermore, this request appears to be duplicative of existing ongoing processes including those specific to the National Environmental Policy Act (NEPA) and the

Freedom of Information Act (FOIA). San Juan Citizens Alliance has participated in the NEPA process associated with the GRRR RMPA/EA by submitting comments on the Draft RMPA/EA dated February 19, 2014, February 20, 2014, and April 5, 2013. San Juan Citizens Alliance has also submitted three FOIA requests regarding the GRRR, dated May 1, 2013 in the amount of 9,487 pages, February 13, 2014 in the amount of 3,040 pages, and February 19, 2014 in the amount of 189 pages, for a total record of 12,716 pages.

If you wish to file an appeal, please provide more specific details regarding the nature of the problems identified and the correction that you seek. We appreciate your continued interest in appropriate management of the GRRR, and look forward to ongoing collaboration as we finalize the management plan for the area.

Sincerely,

/s/ Michael H. Tupper

Michael Tupper
Deputy State Director
Division of Lands and Resources

cc:
NM930, D. Goodman