



San Juan Citizens Alliance

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Gary Torres
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Re: INFORMATION QUALITY ACT REQUEST ON GLADE RUN RECREATION AREA (GRRRA) RECREATION AND TRAVEL MANAGEMENT PLAN/ENVIRONMENTAL ASSESSMENT

Dear Mr. Torres,

San Juan Citizens Alliance (*SJCA*) submits this Information (Data) Quality Act Request (Pub. L. No 106-554, § 515, 144 Stat. 2763, 2763A-153-154-154 (2000)) on the Bureau of Land Management (BLM)/Farmington Field Office (FFO) Glade Run Recreation Area Recreation (GRRRA) Resource Management Plan Amendment/Environmental Assessment (RMPA/EA) Travel Management Plan (TMP). Please provide BLM notification receipt within 10 days and BLM evaluation within 60 days. Please note a Freedom of Information Act Request has been filed in conjunction with this Information Data Request concerning specific references in the GRRRA RMPA/TMP EA.

SJCA is a non-profit organization concerned with public land issues including BLM/FFO management oversight. SJCA has standing on the GRRRA RMPA/EA to date and has been diligent in participating in the project over many years, depending on BLM to utilize information and data to manage public lands. The GRRRA RMPA/EA is a controversial/complex document that includes significant amounts of information and data that BLM must utilize as part of the decision-making process and procedures.

The Information Quality Act and associated Information Quality Program (ensuring the Quality, Objectivity, Utility, and Integrity of Information) are clearly described by BLM in defining agency responsibilities to comply with the Information Quality Act (see

http://www.blm.gov/pgdata/etc/medialib/blm/wo/Information_Resources_Management/data_quality.Par.20489.File.dat/2012_Information_Quality_Information_Sheet.pdf). Following Office of Management and Budget (OMB) guidance, it is incumbent upon BLM to properly respond to this Information Act Request submitted by SJCA on the GRRA RMPA/EA. The Information Act Request concerns Information quality, utility, objectivity and integrity. According to BLM Program responsibilities at http://www.blm.gov/pgdata/etc/medialib/blm/wo/Information_Resources_Management/data_quality.Par.20489.File.dat/2012_Information_Quality_Information_Sheet.pdf:

Quality

An encompassing term comprising utility, objectivity, and integrity. Therefore, the Information Quality Guidelines sometimes refer to these four statutory terms collectively as quality.

Utility

refers to the usefulness of the information to its intended users, including the public. In assessing the usefulness of information that the Department disseminates to the public, the agency needs to reconsider the uses of the information not only from the perspective of the Department but also from the perspective of the public. As a result, when transparency of information is relevant for assessing the information's usefulness from the public's perspective, the Department must take care to ensure that transparency has been addressed in its review of the information.

Objectivity

involves two distinct elements: presentations and substance: (a) Objectivity includes whether disseminated information is being presented in an accurate, clear, complete, and unbiased manner. This involves whether the information is presented within a proper context. (b) In addition, objectivity involves a focus on ensuring accurate, reliable, and unbiased information. In a scientific, financial, or statistical context, the original and supporting data shall be generated, and the analytic results shall be developed, using sound statistical and research methods.

Integrity

refers to the protection of the information from unauthorized access or revision, to ensure that the information is not compromised through corruption or falsification.

SJCA also notes Department of the Interior (The Department/BLM) Guidelines for the Information Quality Act that include:

1. All information disseminated by the Department must comply with basic standards of quality to ensure and maximize its objectivity, utility, and integrity.
2. The Department will ensure that information disseminated will be developed from reliable methods and data sources and will otherwise ensure information quality at each stage of information development.
3. The Department's methods for producing quality information will be made transparent, to the maximum extent

practicable, through:

- a. Accurate documentation;
 - b. Use of appropriate internal and external review procedures;
 - c. Consultation with experts and users; and
 - d. Verification of its quality.
4. The Department will also inform users about corrections and revisions.
 5. Information released by the Department will be developed only from reliable data sources based on accepted practices and policies, utilizing accepted methods for information collection and verification. It will be reproducible to the extent possible. Influential information will be produced with a high degree of transparency about data and methods. Analytic results shall generally require sufficient transparency about data and methodology that an independent reanalysis could be undertaken by a qualified member of the public resulting in substantially the same results.

(source:

http://www.blm.gov/pgdata/etc/medialib/blm/wo/Information_Resources_Management/data_quality.Par.20489.File.dat/2012_Information_Quality_Information_Sheet.pdf)

The specific reference to challenged information is the GRRR RMPA/EA. The statement of error concerns discrepancies/contradictions in data associated with information on the following data points in the GRRR RMPA/EA:

1. All surface disturbance by oil and gas activities in the GRRR including well pads, roads, pipelines, central delivery points, compressors, waterlines, electrical lines, and pig launchers. Data on total surface disturbance by all oil and gas activities in the GRRR.
2. All travel management data (routes, roads, approved right of ways) with data on open, closed and limited travel designations including Off-Highway Vehicle routes. Additionally, data on travel management inventory maps so travel management segment condition/description can be tied to on the map locations.
3. All data on closed routes, and closed right of ways in the GRRR.
4. All land health standard determination and sustained yield data for multiple use resources in the GRRR.
5. All minimization criteria data used for all resources evaluated in the GRRR RMPA/EA.
6. All monitoring data used by BLM to comply with monitoring responsibilities of the 2003 Resource Management Plan and monitoring reports required annually from 2004-present.
7. All data concerning archeological resources in the GRRR, including a distribution map of the archeological sites listed in section 3.7 of the RMP/EA by area/location, site type, feature type, alternative boundary and RMZ Zone. In addition, all data concerning National Register of Historic Places eligible, undetermined, or not considered eligible sites. Please also provide all data on the archeologically "surveyed area" of the GRRR – i.e., what has been examined on foot to current "Class III" (intensive inventory) standards.

The statement of affect is that SJCA is unable to verify the data used for analysis by BLM in the GRRR RMPA/EA. Since the BLM has not provided any basis for asserting the quality of its data and there are numerous discrepancies concerning oil and gas infrastructure, routes, roads,

inventories, minimization, and monitoring, we request correction under the Information Quality Act. SJCA's intent is to insure that BLM utilizes the highest quality scientific data in making important and transparent decisions for public lands in Farmington.

The contact information for SJCA is included at the top of this document and is the address for all official correspondence. Please contact me if there are questions. We look forward to your timely response.

Respectfully submitted,

s/ Mike Eisenfeld

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