

2020 RGFO PROCESS CHANGES

Fieldwork authorizations

- Email FWA request PDF, with map of proposed APE and shapefiles, to BLM
- BLM will sign FWA once it receives completed FWA request, contractor shapefiles, and proponent shapefiles (sent from the proponent to the appropriate non-cultural resources BLM POC).

Post-Fieldwork/Pre-Reporting

- Request the following from BLM:
- Undertaking name
 - BLM number
 - SHPO doc number [provide BLM with county name(s) and positive/negative results status]
 - Site numbers (provide BLM with linear/non-linear status and any known site names)

Reporting

- Transmit completed shapefiles, including attribute tables populated with BLM and SHPO numbers (as well as the rest of the fields), and draft documentation to BLM.
- BLM will review forms first, and will not review reports until forms review is complete, as reports often change with form revisions.

WORKING WITH THE RGFO 2020

(OIL AND GAS)

(Changes from 2019 highlighted in yellow; changes since the original 2020 spex in gray)

Naming Conventions

Due to changes to the NEPA process that are being imposed on BLM, it is now extremely important that names of undertakings are clear, unambiguous, and consistent in all paperwork. Therefore, **BLM** will establish the name of the undertaking, and it will need to be used in all attribute tables, forms and reports, and any other references to the undertaking. Additional words must not be added to the title (e.g., “Cultural Resources Inventory of”, county name, state name).

This will be done by our oil and gas staff. The name will consist of the operator's company name and a unique pad name (**NOT** the name of a third-party contractor or a name generated by the archaeological contractor).

Fieldwork Authorizations (“FWAs”)

In order to avoid unanticipated time and cost to the operators, the BLM archaeology staff, as well as the BLM oil and gas staff, must receive compatible shapefiles at the time that the FWA is requested. Archaeological contractors are encouraged to communicate this requirement to any operator seeking their services. The BLM oil and gas staff must receive the shapefiles from the operator (rather than from the archaeological contractor).

The shapefiles sent from the archaeological contractors to the BLM archaeological staff must include both the proposed infrastructure locations (infrastructure includes well pads, road, pipelines and associated facilities) and the proposed buffers. If the archaeological inventory results in a need to relocate infrastructure, the archaeological contractor must contact the BLM to determine whether any additional inventory is necessary. These steps will streamline the process from FWA through completion of the NEPA document, and will prevent the need for additional inventory, documentation and SHPO consultation at the last minute.

Please e-mail us a PDF containing the completed FWA application form and map of the proposed inventory area, along with shapefiles in NAD 83, Zone 13. Because shapefiles must be sent to both archaeological and oil and gas staffs from the appropriate source, we can no longer guarantee the completion of the FWA process on the same day that the FWA request is received.

Please DON'T include maps containing site information with FWA requests. The FWAs are public documents.

All infrastructure must be inventoried, including well pads, roads, pipelines and other facilities. For linear infrastructure, inventory buffers should be at least 50' on both sides of the centerline.

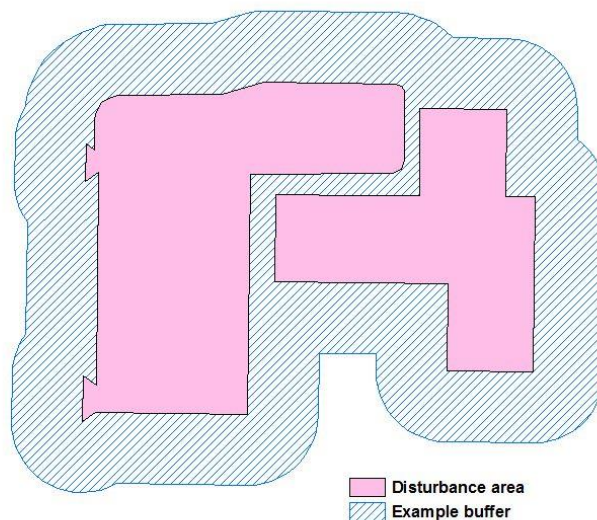
Well pad and facilities inventory is on a sliding scale, and is based on the shape of the disturbance area. The inventory buffer must be centered over the area of disturbance, regardless of land status. Please advise operators that the buffers must be adequate to cover the pads and associated facilities and infrastructure ultimately submitted in the apd, or re-inventory will be necessary.

Square area of disturbance buffer requirements:

- 5 acres or less = 10 acre inventory
- 5+ - 10 acres = 20 acre inventory
- 10+ = 40 acre inventory

Non-square (round, rectangular, multi-sided polygon or glob, etc.) area of disturbance buffer requirement:

- The main disturbance area, whether “temporary” or “permanent”, plus a 50 m’ (164’) buffer echoing the shape of the disturbance area:



Block surveys are encouraged.

Permittees may not place physical datum markers on sites. If this occurs, the permittee will be required to return to the field and retrieve them.

Pre-Field Literature Reviews

There is no need to visit the office. RGFO and SHPO have much of the same information, which can be accessed in the Compass database. However, the SHPO is currently behind in updating Compass, so please let us know if you notice missing data. **NOTE THAT BECAUSE SHPO IS SO FAR BEHIND, WE WILL ALERT YOU TO ANY RELEVANT INFORMATION WHEN PROCESSING YOUR FWA.** We keep our database up to date, and so might have more information than is available in Compass.

Communications

Please do not direct operators to the BLM archaeologist. Instead, direct your clients to the RGFO Oil and Gas team, who are the point of contact for operators and their subcontracting environmental companies (if they are using a third party).

Please also note that BLM is the OAHP POC for BLM RGFO federal undertakings. Confusion has resulted from contractors working directly with OAHP, therefore, **all** communications, **now including the retrieval of site numbers¹**, will go through BLM. **When site numbers are needed, please contact the RGFO, but do not ask for more than needed for an individual undertaking. In the interest of efficiency, BLM will now request the SHPO doc number at the same time site numbers are requested. For negative results, you may contact us for the SHPO doc number before you start working on your report.**

Reporting and Finalizing

The Colorado SHPO Limited Results Cultural Resources Survey Form may be used for reports of negative inventories, or inventories during which four or fewer isolated finds were recorded.

Before starting on your post-field documentation, request the following from BLM:

- **Undertaking name**
- **BLM number**
- **SHPO doc number [provide BLM with county name(s) and positive/negative results status]**
- **Site numbers (provide BLM with linear/non-linear status and any known site names)**

Linear Recording Policy

- **Beginning in FY2020, newly-identified linear sites or newly-identified segments of linear sites in the RGFO will be recorded on BLM forms, tailored to the RGFO. We will provide blank forms and examples, if requested.**
- **The MDF will be used to document the site overall, and must therefore be accompanied by a map illustrating the entirety of the site (even if it must be estimated) and a narrative history. Note that we will *not* be asking for a full-length shapefile², given the added workload, and thus, the cost to proponents. References and historic maps should also be included, if available.**
- **If not recorded in their entirety, linear sites will be determined to be either “Needs Data” or “Eligible”, pursuant to SHPO policy. The RGFO prefers “Needs Data”, as it is more accurate, and the sites will be treated as eligible until completely documented and proven otherwise.**

¹ OAHP has indicated that some contractors are requesting larger blocks of numbers than necessary for individual undertakings. If you have any of these “archived” site numbers, please use them up, if possible, before requesting more from BLM.

² Per Holly McKee-Huth of OAHP: “if a [full-length] linear cuts across multiple counties, whether it is a segment, the extent within the county, or the extent throughout multiple counties, it needs to have corresponding smithsonian numbers and data. This is how it will have to go into our system. It is certainly fine if you want to send in the extent of the linear within the county that the new segment has been recorded in, but if the entire extent, shown on the MDF, exceeds more than one county, we will need separate smithsonian numbers for each county, corresponding legal locations, and maps. I understand this causes more work, but this is what we have to do when a form comes into our office this way. If you don’t want the entire extent in our system, I would recommend only providing forms, maps, and shapefiles that reflect what you want. With the amount of data and forms we get into this office, we rely on what is provided on the forms to know what to enter into the database.”

- Each segment will be recorded on a BLM RGFO linear segment form, and will be accompanied by a map illustrating the location of the segment in the context of the site overall, as well as a 24k topo map, segment map, and photographs. Narrative information will not be necessary, unless it supplements what has already been presented in the MDF.
- Once an MDF has been completed for the site, a new one for each segment will not be necessary. For the benefit of the record, it is wise to include a copy of the original MDF in every submittal, but is not absolutely necessary.
- Effects:
 - A no adverse effect is found when an eligible site will be impacted, but the impact will not affect any of the characteristics of the site that render it eligible [36 CFR 800.5 (a)(1)³] (for example, if the undertaking will affect the setting of an eligible site, but the site is eligible based on its importance to history and setting is not a contributing factor in the eligibility assessment). The no adverse effect determination is the SHPO's preference, per Holly Norton.
 - A no effect is found when:
 - the undertaking will not directly or indirectly impact the linear site; or
 - the linear site as a whole is ineligible; or
 - the undertaking will affect a non-supporting portion of an eligible or needs data site

Permittees must strictly adhere to Colorado permit stipulations regarding reporting. Final reports must be submitted to the BLM, **not** to the operator or proponent.

Draft documents must be in Word format and final documents must be in PDF format and compiled (not submitted in sections). Please do not include blank pages in the PDF and do not lock pdf files (do not make them read only). If we need to make a slight change or add the final letter to the report, we will not be able to do so.

Because of the increased emphasis on timeliness, the RGFO strongly recommends that both technical editing and content review is performed by the PI overseeing the work, prior to submitting documents. Please do not use BLM to “train” your new employees. Documents that have clearly not received either technical editing or content review will be returned immediately and will not be reviewed by BLM staff until they meet professional standards.

Please add the following discussions to your report:

1. Direct, indirect and cumulative impacts of the undertaking.
2. A section discussing your recommended determination of effect. **Remember: the DOE applies to the undertaking as a whole, not to individual sites [36 CFR 800.4 (d)(D)(2)].**

Transmit completed shapefiles, including attribute tables populated with BLM and SHPO numbers (as well as the rest of the fields), and draft documentation to BLM. We will review forms first, and will not review reports until forms review is complete, as reports often change with form revisions.

Electronic requirements are described in detail in the Digital Specification Handbook, and must be followed, except for the attribute tables. Please use the RGFO format, which we will supply via email. Details are attached. Please use short, stable filenames and **DO NOT PLACE COMPRESSED (“ZIPPED”) FILES IN ANOTHER COMPRESSED FILE.**

³ “An adverse effect is found when an undertaking may alter, directly or indirectly, any of the *characteristics of a historic property that qualify the property for inclusion* in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.”

Do not include pages labeled “this page intentionally left blank”. ALL DOCUMENTS MUST BE DOUBLE-SIDED AND UNBOUND, BUT MAY BE STAPLED.

In order to avoid adding bulk to our files, please:

- Don't use heavyweight "fancy" printer paper.
- Don't place paper 'separators' between sets of documents when mailing hard copies.
- Don't send single-sided reports and site forms. All documentation should be double-sided.
- Do not include pages labeled “this page intentionally left blank”.

When the reports are complete, transmit final PDF files of reports and of any site forms. Also mail us two hard copies. We will e-mail you a scanned copy of our letter to the SHPO after it has been signed.

The RGFO no longer accepts CDs with site or GIS information. The data must be transferred via a direct, dedicated link to a secure cloud service, such as an FTP site. If you are unable to access such a location, contact the RGFO for assistance.

Please send copies of documentation directly to other government entities (e.g., the USFS and NPS), vs. sending them to us first and having us resend them.

Curation

The Royal Gorge Regional Museum and Local History Center, in Cañon City, is now able to accept BLM collections from RGFO compliance projects. Please contact Lisa Studts at (719) 269-9036 to set up a curation agreement.

In general, we ask that you collect diagnostics or unusual artifacts from BLM land. However, the policy might vary depending on the undertaking, so please contact the office if you are unsure.

APPENDIX I: REQUIRED ATTRIBUTE TABLE FIELDS

SITE ATTRIBUTE TABLE

Attribute	Type	Definition
ID	Integer	Unique sequential numeric ID for a given spatial feature. (LEAVE BLANK)
SITE_	Text	Smithsonian site number in SHPO format (ex 5ME.4000 or 5GF.342).
SITE_NAME	Text	Name of resource, if any.
AGENCY_	Text	Any project number unique to the agency responsible for the document (BLM Numbers).
SHPO_ID	Text	Unique SHPO number referring to a specific report document.
DATE	Date	Date site was digitized in GIS.
ACRES	Double	Acreage of the site calculated by the GIS from the spatial features in the data set. (Should match site form information)
SITE_TYPE	Text	General temporal affiliation. Use: [Historic / Prehistoric / Multicomponent / Protohistoric / Unknown]
SITE_DESC	Text	Brief description of resource (use standard terminology where possible)
LINEAR	Integer	Enter 1 or 0. A "1" denotes that the site is a linear site. A "0", the default, is used for all non-linear sites.
ELIGIBILIT	Text	Resource eligibility for the NRHP. Use: [Eligible / Not Eligible / Needs Data / Supporting / Non-Supporting / Contributing / Non-Contributing]
ZONE	Integer	This is the UTM zone in which the site is located.
X	Double	The X coordinate in UTM meters of the center point of the site (can be automatically calculated by GIS but must match with info on site form)
Y	Double	The Y coordinate in UTM meters of the center point of the site (can be automatically calculated by GIS but must match with info on site form)
COMMENTS	Text	Any additional information not captured elsewhere.
SOURCE	Text	BLM field office name.
BND_CMPLT	Text	Boundary completeness. Refers to the completeness of the site boundary. Values for this field will either be Y (YES the boundary is complete) or N (NO the boundary of the site is not complete or unknown) or 9 if the completeness of the site boundary has not been checked.
CONF	Text	Confidence given to the spatial accuracy of the digitized feature. Values for this attribute consist of LC (Low Confidence – ex: digitizing from hand drawn maps, or not field checked), HC (High Confidence – collected via GPS units in the field) or P (Paleontological).
VER	Text	(LEAVE BLANK for OAHP use)
AREA	Double	Area of the spatial features in the data set (Calculate via GIS)
PERIMETER	Double	Perimeter of spatial features in the data set. (Calculate via GIS)

SURVEY ATTRIBUTE TABLE

Attribute	Type	Definition
ID	Integer	Unique sequential numeric ID for a given spatial feature. (LEAVE BLANK)
DOC_	Text	Unique SHPO number referring to a specific report document.
AGENCY_	Text	Any project number unique to the agency responsible for the document (BLM Numbers).
TITLE	Text	Report title (given by BLM).
AUTHOR	Text	Primary report author.
DATE	Date	Date the shapefile was created.
ACRES	Double	Acreage of the survey area calculated by the GIS from the spatial features in the data set
SURV_TYPE	Text	Inventory strategy / survey type Use: [INTENSIVE / RECONNAISSANCE / PALEONTOLOGICAL / UNSPECIFIED]
SITE_COUNT	Integer	The total number of sites recorded during the inventory.
IF_COUNT	Integer	The total number of isolated finds recorded during the inventory.
EL_COUNT	Integer	The total number of eligible sites recorded during the inventory (a subset of SITE_COUNT).
ZONE	Integer	UTM Zone the survey is located in. If a survey crosses two zones, digitize it in the zone in which the most land is covered.
X	Double	The X coordinate in UTM meters of the center point of the survey.
Y	Double	The Y coordinate in UTM meters of the center point of the survey.
COMMENTS	Text	Any additional information not captured elsewhere.
SOURCE	Text	BLM field office name.
CONF	Text	Confidence given to the spatial accuracy of the digitized feature. Values for this attribute consist of LC (Low Confidence – ex: digitizing from hand drawn maps, or not field checked), HC (High Confidence – collected via GPS units in the field) or P (Paleontological).
VER	Text	(LEAVE BLANK FOR OAHP use)
AREA	Double	Area of the spatial features in the data set
PERIMETER	Double	Perimeter of spatial features in the data set