

**BLM Pinedale Field Office Adaptive Management Decision Process
for
DEQ request to extend Air Analyst position an additional two years and four months
(from March 1, 2012 to June 30, 2014)**

Introduction

The Bureau of Land Management (BLM) Pinedale Field Office (PFO) recently went through the Adaptive Management (AM) process in response to a Wyoming Department of Environmental Quality (DEQ) request to extend an Air Analyst position an additional two years and four months. The following is a summary of that process which resulted in a February 8, 2012 decision to fund the position using up to three funding sources.

Background

The Record of Decision (ROD) for the Supplemental Environmental Impact Statement for the Pinedale Anticline Oil and Gas Exploration and Development Project Area (page 27 Implementation Measure 6.c) allowed funding for an Air Analyst position for a period of two years, not to exceed \$160,000.

Because the original funding for the Air Analyst position ended in February 2012 and because the DEQ determined the Air Analyst position played a critical role in air quality management in the Pinedale Anticline Project Area (PAPA) and surrounding area, the DEQ requested AM on November 1, 2011 to extend the position through June 2014.

The DEQ AM Request and Subsequent BLM Actions

The November 1 DEQ correspondence requested to fund the Air Analyst position by amending the ROD to fund the position with an additional \$169,000 from the Pinedale Anticline Monitoring and Mitigation Fund.

In response to the November 1 request, PFO Field Manager Shane DeForest formed an AM Review Team to determine if the DEQ Adaptive Management proposal had merit, if the proposal was time-sensitive and if the proposal was in conformance with the National Environmental Policy Act and the ROD. The AM Review Team was composed of representatives with the PFO, the Pinedale Anticline Project Office (PAPO) and the DEQ.

The AM Review Team made a preliminary recommendation in a December 15, 2011 Memorandum stating the DEQ AM proposal had merit, was time-sensitive, additional NEPA review was not warranted and the DEQ funding proposal would still meet the intent of the ROD. Additionally, the AM Review Team recommended the public be notified of the DEQ AM proposal for two weeks (December 24, 2011 through January 6, 2012).

Public Noticing of the DEQ AM Proposal

On December 9, 2011, the DEQ submitted an addendum to the initial November 1 AM proposal which offered an alternative method of funding the analyst position through DEQ ambient monitoring funds (as described in the ROD page 27, implementation measure 6.b.). The caveat was the DEQ's preference for utilizing Monitoring and Mitigation funds to extend the position as outline in their initial November 1 AM request. In essence, the addendum was a Plan B to fund the position if a decision was made not to fund the position through the Monitoring and Mitigation Fund.

The two week public notice period resulted in two comment letters. One letter was from the Wyoming Outdoor Council (WOC) and the other letter was from Pinedale Anticline oil and gas operators. Both letters suggested funding the Air Analyst position through different funding sources – the WOC preferred funding from unspent ambient monitoring funds while the operators recommended funding through a modified Southwest Wyoming Air Quality Agreement.

Decision on the DEQ AM Proposal

A compromise was reached on February 8, 2012 during a teleconference between the Pinedale Anticline Monitoring and Mitigation Board (Board) and PFO representatives.

The Board decided to fund the Air Analyst position for one year with the Monitoring and Mitigation Fund. The Board also decided the remaining one year and four months could be funded from either unspent DEQ ambient monitoring funds or an alternative DEQ funding source that did not come from the Monitoring and Mitigation Fund.

A summary of the information that was used to develop the compromise decision and the final incorporated revised ROD language is detailed in the February 8, 2012 PFO Memorandum.

Additional Information

If you need any additional information or have any questions relating to the DEQ AM process, please send a written request to Eric Decker, PAPO Project Coordinator, 1625 W. Pine St., P.O. Box 768, Pinedale, WY 82941 or email egdecker@blm.gov

Files Posted with this AM Summary Include:

1. Initial DEQ November 1, 2011 AM request
2. Amended DEQ December 9, 2011 AM request
3. December 14, 2011 Review Team Recommendation (signed on Dec. 15, 2011)
4. February 8, 2012 PFO Final Recommendation
5. Final word changes to the ROD approved on February 8, 2012