



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

High Desert District

Pinedale Field Office

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In Reply Refer To:

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Adaptive Management Proposal #1 2012

MEMORANDUM

TO: Shane DeForest, Field Manager

Shane DeForest 12-15-11

FROM: Eric Decker, Project Coordinator, JIO/PAPO

Eric Decker 12/15/11

SUBJECT: Review Team Preliminary Recommendation on DEQ's November 1, 2011 Adaptive Management Proposal and DEQ's December 9, 2011 Addendum

Purpose

The purpose of this memorandum is to provide an initial recommendation to Shane DeForest (Pinedale Field Manager) from the Review Team per the November 21, 2011 BLM Memorandum sent to Kelly Bott (DEQ), Greg Noble (BLM) and Eric Decker (JIO/PAPO Project Coordinator). Per the Memorandum, the Review Team is composed of Jeni Cederle (DEQ), Kelli Roadifer (BLM) and Eric Decker. Eric was designated as the lead person for the Review Team.

Preliminary Recommendation Background

The preliminary recommendation in this memorandum is based on:

1. information submitted by DEQ in regards to their formal November 1, 2011 Adaptive Management request to modify the Pinedale Anticline ROD (implementation item 6c on page 27) to provide for additional funding (\$169,000) and additional time (through June 2014) for an Air Quality analyst contractor position;
2. information submitted by DEQ on December 9, 2011 as an addendum to the November 1, 2011 Adaptive Management request to fund an Air Analyst position in an alternative manner by using unspent ambient monitoring funding (per proposed ROD wording

modification in implementation item 6b on page 27) that would allow for an additional two year four month period of the Air Quality analyst position at a cost of an additional \$169,000 (with the understanding that DEQ's preferred funding option is item one above);

3. information presented by DEQ staff to the PAPO Board of Directors at their December 1, 2011 meeting in Cheyenne;
4. language and intent of the Pinedale Anticline ROD;
5. discussions by the Review Team considering the complexities of the air quality issues in the PAPA and surrounding area; and
6. information submitted by DEQ on December 13, 2011 as a recommendation for Adaptive Management and funding approval.

Review Team's Initial Task

Per the initial analysis tasks outlined in the November 21, 2011 BLM Memorandum, the Review Team decided that: both DEQ funding scenarios have merit; the proposal as outlined by DEQ is time-sensitive; the proposed funding scenarios and related potential ROD wording changes do not require additional NEPA and both DEQ funding scenarios potentially meet the intent of the ROD as another potential mitigating mechanism to continue to address increasingly complicated air quality issues in the PAPA and surrounding area.

Preliminary recommendation

Based on the submitted DEQ information, discussions and information from Review Team consultations, analysis tasks conducted by the Review Team, the continued significance of the air quality issues relating to the Pinedale Anticline Project area and surrounding area, the preliminary recommendations of the Review Team are:

1. Both DEQ funding proposals have merit from the perspective that the public and others (described below) should have the formal opportunity to comment on the DEQ adaptive management funding proposals.
2. Based on item one above, the DEQ initial proposal, the DEQ addendum and the December 13, 2011 DEQ recommendation should receive formal consideration by the public (posted on the JIO/PAPO and field office website for public comment for 14 days); be forwarded to the Pinedale Anticline Working Group (PAWG) for their review (in writing with a specified 14 day response time or a special meeting as determined by the Pinedale Field Manager); and be forwarded to the PAPO Board of Directors for their information and review with a specified 14 day response time.

3. After the receipt of public, PAWG and PAPO Board Comments, a meeting should be held with the operators for the purpose to explain the proposal, present a summary of comments received and document any operator comments on the DEQ proposals.
4. After all comments are received, the Review Team will consider the comments and prepare a final recommendation to the Pinedale Field Manager by February 1, 2011.