

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
COLORADO STATE OFFICE
2850 YOUNGFIELD STREET
LAKEWOOD, COLORADO 80215-7093
January 9, 2001

In Reply Refer To:
CO-932 (P)
1610, 1730, 4100

EMS Transmission 01/09/2001
Instruction Memorandum No. CO-2001-013
Expires: 09/30/2002

To: Field Office Managers

From: Deputy State Director, Resource Services

Subject: Assessment/Evaluation of Land Health Standards on a Watershed Basis
DD 2/28/01, 6/30/01

Several significant events have occurred since Instruction Memorandum No. CO-99-002, dated October 13, 1998, was issued. These events include:

- Land health assessment workshop held in Reno, Nevada, April 2000
- The Unified Federal Policy for Ensuring a Watershed approach to Federal Land and Resource Management
- Statewide Technical Program Review (TPR) on permit renewal and land health assessments in May, 2000
- New guidance and direction from the Washington Office (WO) on assessments/evaluations as per the most recent draft manual/handbook 4180-1 titled Land Health Standards
- Direction in the 1020 Rangeland Management Fiscal Year (FY) 2001 annual work plan directives to complete land health assessments utilizing a priority watershed approach on a ten year schedule.

Based upon these events, Colorado Policy IM No. CO-99-002 on Implementation of Public Land Health Standards is being clarified/modified as follows:

Assessment/Evaluation on a Watershed Unit: It is Bureau of Land Management (BLM) policy that land health assessments/evaluations will primarily be conducted on a watershed (Fifth field, ten digit Hydrologic Unit code (HUC)) basis except when compelling issues dictate that an administrative or ecosystem-based boundary take precedence. The rationale for not using a watershed boundary must be documented as part of the assessment/evaluation report. Therefore, field offices (FO) that have previously divided their administrative area into assessment/evaluation units other than watersheds need to provide that rationale. For statewide consistency, a map delineating the fifth field watersheds of Colorado will be furnished to each FO. Using the map provided, all FO's will divide, prioritize, and schedule the

year in which the assessment/evaluation will be completed on each watershed or other assessment/evaluation unit by February 28, 2001. Where FO administrative boundaries divide fifth field watersheds, those offices are to coordinate and agree upon the schedule for completing the assessment/evaluation. The schedule should ensure that all public lands will be assessed/evaluated over the next eight-nine years, if not sooner. Upon receipt of each FO delineation and schedule, Colorado State Office web masters will post the maps with schedules on the internet for a 30 day public scoping comment period. Following the comment period each FO, using public comment and staff input will finalize their individual assessment/ evaluation schedules and have these posted on the internet for public information.

Level of Assessment/Evaluation: Assessments/evaluations are to be issue-driven and the level of assessment/evaluation should be proportionate to the resource issues, concerns, controversy, and interest within the watershed or assessment/evaluation unit. The fundamental purpose of making assessments/evaluations issue-driven is to identify issues of concern and to filter out those that are not. The end product should substantially meet all the assessment/evaluation needs at the local level in order to avoid conducting multiple assessments/evaluations for multiple needs. It is recognized that assessments/evaluations will not be conducted on all watersheds or other units. In these instances, the FO managers must identify the reasons and provide the rationale why an assessment/evaluation will not be conducted. For the public lands within those watersheds, a low level assessment/evaluation would be completed when processing program specific actions, such as grazing permit renewals, applications for permit to drill, or developing structural or land treatment type projects. This level of assessment/evaluation would simply be a determination or NEPA consideration of compliance with health standards. The assessments/ evaluations in all cases will be accomplished and completed using an Inter-disciplinary Team (IDT) of journey-level specialists that adequately represent the natural resources involved.

Assessment/Evaluation Report: The assessment/evaluation is not a decision document or determination, but a stand alone report on the health of the land, water, and plant and animal communities on the public land within the watershed or unit and is not to be construed as being driven by any specific uses on those lands. An assessment is conducted by gathering, synthesizing, and interpreting information, from observations or data from inventories and monitoring. An assessment characterizes the status of resource conditions, so that the status can be evaluated (see definition of evaluation) relative to land health standards. An assessment sets the stage for an evaluation and will be signed by all team members as preparers, but does not constitute a finding on meeting or not meeting standards or determination of causal factors when standards are not achieved. Exhibit A attached, provides an outline of what should be included in an assessment report.

An evaluation goes further than an assessment because an evaluation takes what the assessment provides, which is the status of resource conditions characterized by the appropriate indicators, and evaluates them according to land health standards. Then, this leads to a finding of: land health standards achieved; making significant progress toward achieving; or land health standards not achieved. If the land health standards are not achieved, the evaluation of the causal factors allows a determination to be made. In summary, an evaluation builds on the assessment, and the evaluation sets the stage for a determination.

A separate official determination document will be signed by the FO manager or their acting. This determination will provide thorough, written, documentation of the rationale why an area does or does not meet the applicable standard(s) for public land health in Colorado.

Followup on the Assessment/Evaluation Report - Actions Required: Once the official finding and determination have been made, each BLM program area is responsible for implementing appropriate corrective action. In the case of livestock grazing where existing grazing management practices or levels of grazing use are significant factors in failing to achieve the standards, 43 CFR 4180.2(c) of the grazing regulations requires the authorized officer to take appropriate action as soon as practicable, but not later than the start of the next grazing year. The start of the next grazing year is defined as March 1, or the next earliest turn out date scheduled for the allotment or area of concern. For all other program areas whose use(s) are determined to be the significant factor in failing to achieve the standard(s), appropriate changes or corrective action(s) will be taken as soon as possible.

Public Land Health Assessment/Evaluation Reporting: Draft handbook/policy 4180 - 1 provides the appropriate guidance for conducting, documenting, and reporting the results of land health assessments/evaluations.

Land Health Assessment and NEPA Analysis: As mentioned previously, an assessment/evaluation is a stand alone document on the health of the land, water, and the plant and animal communities on the land. This document is not to be driven by any specific use or BLM program. Thus, in environmental analyses of proposed actions; e.g., grazing permit renewal EA's/DNA's, it is possible that an assessment/evaluation will not be completed on the area involved in the action. In this situation, the NEPA document should address known issues, concerns, etc. using the most current available data. If a future land health standard assessment and evaluation leads to a determination that livestock grazing is a significant causal factor for not achieving standard, and is preventing significant progress toward achieving the standard, then appropriate action will be taken at that time, with NEPA analysis. In situations where environmental analysis is being conducted on proposed actions and the assessment/evaluation report has been completed for the area(s) involved, the findings should be summarized in the NEPA document and a reference made as to the availability and location of the full reports.

Monitoring Plans and Indicators of Health Standards. With the development and implementation of Colorado's health standards, it is now appropriate to review FO monitoring plans, update, and revise as necessary to include monitoring of Health standard indicators. Each FO is to complete this task and have their updated plan in place by June 30, 2001, and a copy provided to CO-932.

If you have any questions, please contact Mark Storzer at (303) 239-3722.

Signed by
Frank Salwerowicz
Deputy State Director,
Resource Services

Authenticated by
Don Snow
EMS Operator

Attachment - Exhibit A

Exhibit A
 LAND HEALTH STANDARDS
 ASSESSMENTS AND EVALUATIONS ON A WATERSHED BASIS

Assessments are the initial step toward managing resources on a watershed basis. Assessments should document the current and reference conditions of the natural resources and the management activities within a watershed. The information/data included in an assessment can then be utilized in evaluations to make determinations, recommendations and finally decisions. However, it should be noted that each of these steps are discrete and build upon each other. Assessments and evaluations should be helpful to multiple programs (i.e. transportation planning, fire planning, habitat restoration, and range management).

The following is a suggested outline for a typical land health assessment.

Introduction - provide a brief overview of the assessment unit including the name, size, priority, BLM involvement and general character of the watershed. Take this opportunity to document the reasoning and rationale for assessing the watershed, especially if the assessment is not being conducted on a 5th field watershed. Also, document which indicators are appropriate for the evaluation of the land health standards in the assessment unit.

Characterization - provide an overview of the base resources in the watershed utilizing existing or readily available information/data.

- Climate
- Hydrology
- Geomorphology
- Soils
- Geology
- Topography
- Plant Communities (potential)

Current Conditions - describe the current conditions of the natural resources (listed below) utilizing existing or readily available information, including professional judgement. Remember to consider the appropriate indicators for each while assessing the current conditions.

- Vegetation/Plant Communities
- Riparian/Morphology
- Wildlife
- Fisheries/Aquatics
- Water Quality

Reference Conditions - describe the reference condition of the natural resources in the watershed.

Management Activities - describe the current management activities occurring in the watershed and the general impacts associated with these activities.

Livestock Grazing
 Mining
 Timber
 Recreation
 Roads

At this point, the first step of watershed management “the assessment” is complete. The assessment can now be evaluated. An evaluation is conducted to arrive at two outcomes. First, the findings of the assessment are analyzed and interpreted relative to land health standards, to evaluate the degree of achievement of land health standards. Secondly, the causal factors for any of the land health standards that are not achieved are identified. The evaluation of the causal factors provides the foundation for the next step of watershed management, the “determination.”

Once the evaluation is complete, the determination that existing management activity is a significant causal factor for not achieving standards (where they are not) must be documented. The determination document must include at a minimum:

- Statement of achievement or non-achievement for each standard
- List of causal factors for not achieving or making significant progress toward achieving standards
- Statement of conformance or non-conformance with guidelines
- Date determination is made, and signature of authorized officer

Documentation of causal factors should clearly identify the evidence used to reach conclusions regarding whether a standard is or is not being met, and which activities are causal factors for not achieving or making significant progress toward achieving the standard.