Appendix E-2

Visual Resources

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SECTION 1 - Approach to Baseline Analysis Under the BLM Visual Resource Management (VRM) System

The Federal Land Policy and Management Act of 1976 (FLPMA) identifies scenic resources as one of the resources for which public lands should be managed. In order to satisfy its responsibilities with respect to scenic resources, the BLM's Visual Resource Management (VRM) Policy establishes a visual assessment methodology to inventory and manage scenic values on lands under its jurisdiction. The BLM manual M-8400 (Visual Resource Management), Handbook H-8410 (Visual Resource Inventory), Handbook H-8431 (Visual Resource Contrast Rating), and Instruction Memorandum 2009-167 (Application of the VRM Program to Renewable Energy) set forth the policies and procedures for determining visual resource values, establishing management objectives, and evaluating proposed actions for conformance with established objectives for BLM administered public lands.

The three primary elements of the BLM's VRM Policy are: (1) determining resource values, (2) establishing management objectives, and (3) evaluating the conformance of proposed actions with those objectives (each of which are described briefly below.

- ***Determining Resource Values:*** The primary means to establish visual resource values is through a Visual Resource Inventory (VRI) that results in the assignment of one of four VRI Classes (I to IV) to represent the relative visual value of an area. VRI Class I has the highest value and VRI Class IV has the lowest. VRI Class I is reserved for special congressional designations or administrative decisions such as Wilderness Areas, visually sensitive ACECs, or Wild and Scenic Rivers, etc. VRI Classes II through IV are determined through a systematic process that documents the landscape's scenic quality, public sensitivity and visibility. Rating units for each of the three factors are mapped individually, evaluated, and then combined through an over-layering analysis. The three factors contributing to the VRI Class determination are described below. The combined factors are then cross-referenced with the VRI Matrix to determine the applicable VRI Class. VRI classes are informational in nature and provide a baseline for existing conditions. They do not establish management direction and should not be used as a basis for constraining or encouraging surface disturbing activities. They provide the baseline data for existing conditions.
- ***Establishing Management Objectives***: VRM Classes (defined below) are determined through careful consideration of VRI Class designations (visual values), land use and demands, and the resource allocations and/or management decisions made in the applicable land use plan for a given area. VRM Class designations set the level of visual change to the landscape that may be permitted for any surface-disturbing activity. The objective of VRM Class I is to preserve the character of the landscape, whereas VRM Class IV provides for activities that require major modification to the landscape. VRI Classes are not intended to automatically become VRM Class designations. VRM Classes may be different then the VRI Classes assigned during the inventory, as the former should reflect a balance between the protection of visual values and other resource use needs. For example, an area with a VRI Class II designation may be assigned a VRM Class IV designation, based on its overriding value for mineral resource extraction or its designation as a utility corridor.
- ***Evaluating Conformance:*** Finally, proposed plans of development are evaluated for conformance to the VRM Class objectives through the use of the Visual Resource Contrast Rating process set forth within BLM Handbook H-8431-1.

Approach Under the CDCA Plan

The general approach described above varies slightly for the proposed OWEF due to the proposed project's location in the CDCA. The CDCA Plan, which is the land use plan covering the area where the project is located, does not contain a visual resource element, and has not established VRM Classes. When a project is proposed and there are no Resource Management Plan-approved VRM objectives, Interim VRM Classes must be established. These classes are developed using the process just described, but may be restricted in geographic scope to areas affected by the proposed action. If the area is also without a VRI, then one must be conducted in order to provide a baseline of data by which to analyze impacts and to inform appropriate designation of interim VRM Classes.

Factors Contributing to VRI Class Determination

VRI Class determination is based on an assessment of scenic quality, viewer sensitivity, and viewing distance zones. The following paragraphs address each of these contributing factors.

Scenic Quality is a measure of the overall impression or appeal of an area created by the physical features of the landscape, such as natural features (landforms, vegetation, water, color, adjacent scenery, and scarcity) and built features (roads, buildings, railroads, agricultural patterns, and utility lines). These features create the distinguishable form, line, color, and texture of the landscape composition that can be judged for scenic quality using criteria such as distinctiveness, contrast, variety, harmony, and balance. Table E-2-1 presents the VRM scenic quality rating components that are evaluated to arrive at one of three scenic quality ratings (A, B, or C) for a given landscape. Each landscape component is scored, and a score of 19 or higher results in a Class A scenic quality rating. A score of 12 to 18 results in a Class B scenic quality rating, while a score of 11 or less results in a Class C scenic quality rating. The three scenic quality classes are described as follows:

- **Scenic Quality Class A** – Landscapes that combine the most outstanding characteristics of the region.
- **Scenic Quality Class B** – Landscapes that exhibit a combination of outstanding and common features.
- **Scenic Quality Class C** – Landscapes that have features that are common to the region.

Viewer Sensitivity is a factor used to represent the value of the visual landscape to the viewing public, including the extent to which the landscape is viewed. For example, a landscape may have high scenic qualities but be remotely located and, therefore, seldom viewed. Sensitivity considers such factors as visual access (including duration and frequency of view), type and amount of use (See Table E-2-2), public interest, adjacent land uses, and whether the landscape is part of a special area (e.g., California Desert Conservation Area [CDCA] or Area of Critical Environmental Concern). The three levels of viewer sensitivity can generally be defined as follows.

- **High Sensitivity.** Areas that are either designated for scenic resources protection or receive a high degree of use (includes areas visible from roads and highways receiving more than 45,000 visits [vehicles] per year). Typically within the foreground/middleground (f/m) viewing distance (see Table E-2-3).
- **Medium Sensitivity.** Areas lacking specific, or designated, scenic resources protection but are located in sufficiently close proximity to be within the viewshed of the protected area. Includes areas that are visible from roads and highways receiving 5,000 to 45,000 visits (vehicles) per year. Typically within the background (b) viewing distance (see Table E-2-3).
- **Low Sensitivity.** Areas that are remote from populated areas, major roadways, and protected areas or are severely degraded visually. Includes areas that are visible from roads and highways receiving less than 5,000 visits (vehicles) per year.

All of the BLM lands in the vicinity of the Proposed Project and Alternatives are located within the CDCA. Because of the public importance imparted by this designation, BLM lands within the CDCA are generally assigned a High rating for Viewer Sensitivity.

Viewing Distance Zones. Landscapes are generally subdivided into three distance zones based on relative visibility from travel routes or observation points (see Table E-2-3). The f/m zone includes areas that are less than three to five miles from the viewing location. The f/m zone defines the area in which landscape details transition from readily perceived to outlines and patterns. The b zone is generally greater than five, but less than 15, miles from the viewing location. The b zone includes areas where landforms are the most dominant element in the landscape, and color and texture become subordinate. In order to be included within this distance zone, vegetation should be visible at least as patterns of light and dark. The seldom-seen (s/s) zone includes areas that are usually hidden from view as a result of topographic or vegetative screening or atmospheric conditions. In some cases, atmospheric and lighting conditions can reduce visibility and shorten the distances normally covered by each zone (BLM 1986b).

Table E-2-1. Visual Resource Management (VRM) Scenic Quality Rating

Component	Scenic Quality Rating		
Landform	High vertical relief (prominent cliffs, spires, or massive rock outcrops); severe surface variation; highly eroded formations (major badlands or dune systems); detail features dominant and exceptionally striking/intriguing. **5**	Steep canyons, mesas, buttes, cinder cones, and drumlins; interesting erosional patterns or variety in size and shape of landforms; or detail features, which are interesting though not dominant or exceptional. **3**	Low rolling hills, foothills, or flat valley bottoms or few or no interesting landscape features. **1**
Vegetation	A variety of vegetative types as expressed in interesting forms, textures, and patterns. **5**	Some variety of vegetation but only one or two major types. **3**	Little or no variety or contrast in vegetation. **1**
Water	Clear and clean appearing, still, or cascading white water, any of which are a dominant factor in the landscape. **5**	Flowing, or still, but not dominant in the landscape. **3**	Absent or present but not noticeable. **0**
Color	Rich color combinations; variety or vivid color; or pleasing contrasts in the soil, rock, vegetation, water, or snow fields. **5**	Some intensity or variety in colors and contrast of the soil, rock, and vegetation but not a dominant scenic element. **3**	Subtle color variations, contrast, or interest; generally muted tones. **1**
Influence of Adjacent Scenery	Adjacent scenery greatly enhances visual quality. **5**	Adjacent scenery moderately enhances overall visual quality. **3**	Adjacent scenery has little or no influence on overall visual quality. **0**
Scarcity	One of a kind, unusually memorable, or very rare within region. Consistent chance for exceptional wildlife or wildflower viewing, etc. **5+***	Distinctive, though somewhat similar to others within the region. **3**	Interesting within its setting but fairly common within the region. **1**
Cultural Modifications	Modifications add favorably to visual variety while promoting visual harmony. **2**	Modifications add little or no visual variety to the area and introduce no discordant elements. **0**	Modifications add variety but are very discordant and promote strong disharmony. **- 4**
Scenic Quality Rating:	**A = 19 or more**	**B = 12 to 18**	**C = 11 or less**

* A rating of greater than 5 can be given but must be supported by written justification

Table E-2-2. Amount of Use Classifications

Type Area	High	Moderate	Low
Roads & Highways	More than 45,000 visits/yr	5,000 to 45,000 visits/yr	Less than 5,000 visits/yr
Rivers & Trails	More than 20,000 visits/yr	2,000-20,000 visits/yr	Less than 2,000 visits/yr
Recreation Sites	More than 10,000 visitor-days/yr	2,000-10,000 visitor-days/yr	Less than 2,000 visitor-days/yr

Table E-2-3. Distance Zones

f/m (foreground/middleground)..... 0 to 3–5 miles
b (background)..... 5-15 miles
s/s..... seldom seen areas

Visual Resource Management Classes. The VRM class for a given area is typically arrived at through the use of a classification matrix similar to that presented in Table E-2-4. By comparing the scenic quality, visual sensitivity, and distance zone, the specific VRM class can be determined. The exception to this process is the Class I designation, which is placed on special areas where management activities are restricted (e.g., wilderness areas).

VRM classes have been established for BLM lands in the vicinity of the Proposed Project.

Table E-2-4. Visual Resource Management (VRM) Classification Matrix

Visual Sensitivity Levels		High			Medium			Low
Special Areas		I	I	I	I	I	I	I
Scenic Quality	A	II	II	II	II	II	II	II
	B	II	III	III*	III	IV	IV	IV
				IV*				
	C	III	IV	IV	IV	IV	IV	IV
Distance Zones		f/m	b	s/s	f/m	b	s/s	s/s

* If adjacent areas are Class III or lower, assign Class III; if higher, assign Class IV.

The objectives of each VRM classification as stated in the BLM VRM *Visual Resource Inventory Manual* are as follows.

- **VRM Class I.** The objective is to preserve the existing character of the landscape. This class provides for natural ecological changes; however, it does not preclude very limited management activity. The level of change to the characteristic landscape should be very low and must not attract attention.
- **VRM Class II.** The objective is to retain the existing character of the landscape. The level of change to the characteristic landscape should be low. Management activities may be seen but should not attract the attention of the casual observer. Any changes must repeat the basic elements of form, line, color, and texture found in the predominant natural features of the characteristic landscape.
- **VRM Class III.** The objective is to partially retain the existing character of the landscape. The level of change to the characteristic landscape should be moderate or lower. Management activities may attract attention but should not dominate the view of the casual observer. Changes should repeat the basic elements found in the predominant natural features of the characteristic landscape.
- **VRM Class IV.** The objective is to provide for management activities, which require major modification of the existing character of the landscape. The level of change to the characteristic landscape can be high. These management activities may dominate the view and be the major focus of viewer attention. However, every attempt should be made to minimize the impact of these activities through careful location, minimal disturbance, and repeating the basic elements in the predominant natural features of the characteristic landscape.

The Interim VRM classes used for the present analysis were originally derived from the Visual Resource Inventory classes developed in the Yuha Desert / West Mesa Visual Resources Management Inventory, prepared by Michael Clayton & Associates in 2006 in advance of the Sunrise Powerlink Project EIS/EIR.

SECTION 2 - Approach to Impact Analysis Under the VRM System

The factors considered in determining impacts on visual resources included: (1) scenic quality of the Proposed Project site and vicinity; (2) available visual access and visibility, and frequency and duration that the landscape is viewed; (3) viewing distance and degree to which Proposed Project components would dominate the view of the observer; (4) resulting contrast of the Proposed Project components or activities with existing landscape characteristics; (5) the extent to which Proposed Project features or activities would block views of higher value landscape features; and (6) the level of public interest in the existing landscape characteristics and concern over potential changes.

An *adverse visual impact* occurs within public view when: (1) an action perceptibly changes existing features of the physical environment so that they no longer appear to be characteristic of the subject locality or region; (2) an action introduces new features to the physical environment that are perceptibly uncharacteristic of the region and/or locale; or (3) aesthetic features of the landscape become less visible (e.g., partially or totally blocked from view) or are removed. Changes that seem uncharacteristic are those that appear out of place, discordant, or distracting. The degree of the visual impact depends upon how noticeable the adverse change may be. The noticeability of a visual impact is a function of project features, context, and viewing conditions (angle of view, distance, primary viewing directions, and duration of view).

Impacts on visual resources within the study area could result from various activities including structure and line construction, substation construction, establishment of construction staging areas and access roads, and Proposed Project operation or presence of the built facilities.

CONTRAST ANALYSIS METHODOLOGY

Under the BLM's VRM methodology, the proposed action and alternatives were analyzed for their effects on visual resources using an assessment of the visual contrast within the landscape created by components of the project. Impacts to the inventoried visual resource values and conformance with Interim VRM Class Objectives are evaluated through a contrast rating process described below. The degree to which the proposed action and alternatives adversely affect the visual quality of a landscape is directly related to the amount of visual contrast between the alternative and the existing landscape character. Visual Contrast Ratings were conducted using the BLM's VRM System manuals (BLM 1984, 1986a). The Visual Contrast Rating Forms are provided in Appendix VR-3. Under the VRM System, the degree to which a project or activity affects the visual quality of a landscape depends on the visual contrast created between the project components and the major features, or predominant qualities, in the existing landscape. Visual contrast evaluates a project's consistency with the visual elements of form, line color, and texture already established in the viewshed. In a sense, visual contrast indirectly indicates a particular landscape's ability to absorb a project's components and location without resulting in an uncharacteristic appearance. Other elements that are considered in evaluating visual contrast include the degree of natural screening by vegetation and landforms; placement of structures relative to existing vegetation, landforms and other structures; distance from the point of observation; and relative size or scale of a project. Once the degree of anticipated contrast is determined (ranging from none to strong), a conclusion on the overall level of change is made (ranging from very low to high) and compared to the applicable VRM class objective for a determination of conformance with the Interim VRM Class objectives.

For the Proposed Project, the Interim VRM Classes was determined to be **VRM Class II** and **VRM Class III**. The management objectives for VRM Classes II and III (as previously noted) are as follows:

- **VRM Class II.** The objective is to retain the existing character of the landscape. The level of change to the characteristic landscape should be low. Management activities may be seen but should not attract the attention of the casual observer. Any changes must repeat the basic elements of form, line, color, and texture found in the predominant natural features of the characteristic landscape.
- **VRM Class III**. The objective is to partially retain the existing character of the landscape. The level of change to the characteristic landscape should be moderate or lower. Management activities may attract attention but should not dominate the view of the casual observer. Changes should repeat the basic elements found in the predominant natural features of the characteristic landscape.

BLM's VRM Policy does not require VRM Classes to be used as a method to preclude all other resource development. However, it does require that visual values be considered and that those considerations be documented as part of the decision-making process, and that if resource development/extraction is approved, a reasonable attempt must be made to meet the VRM objectives for the area in question and to minimize the visual impacts of the proposal. Because the CDCA Plan does not have Resource Management Plan-approved VRM objectives, a land use plan amendment is not necessarily required to address instances of non-conformance. Nevertheless, the overall goal remains minimizing visual impacts through mitigation measures so that any adverse contrasts can be reduced in an attempt to meet the applicable Interim VRM Class II or Class III objectives. In addition to the permanent visual contrast created in the landscape, the proposed action and alternatives are analyzed for adverse effects due to lighting and glare, visible dust plumes, as well as temporary construction-related disturbances.

VISUAL SIMULATIONS

To prepare the visual simulations for each KOP, appropriately scaled polygons were first constructed in Google Earth at each structure location. A Google Earth perspective view was then achieved to match a KOP existing view photograph. The perspective view image was then layered with the existing view image and the constructed polygons were used as guides for appropriately scaling and placing individual wind turbine images into the existing view photograph, which was then saved as the simulation image. A similar process was used for the access roads.

MITIGATION APPROACH

Mitigation for visual resources impacts resulting from energy infrastructure and similar types of industrial facilities typically focuses on methods to minimize the visibility of the resulting visual change either by screening the change from view or by blending the change with the background (by selective use of coloration and/or screening). By their very nature, wind turbines tend to be large and exposed, and thus, difficult to either hide from view or blend into the background. Frequently, the only way to avoid a significant visual impact from a wind turbine is to re-locate the development to a less visible site, though in many situations this measure is not feasible since turbine locations are dictated by available wind resources and wind dynamics. Also problematic is the construction of permanent access and structure spur roads and "temporary" cleared areas that become persistent in arid and semi-arid landscapes where vegetation recruitment and growth are slow. These features often cause unnatural and discordant demarcations in the vegetation landscape that increase the visual contrast of project activities.

However, in some cases there are techniques that can reduce the prominence of land scarring and vegetation changes though they may not reduce the impact to a level that is less than significant. The following techniques were considered where appropriate for the Proposed Project and alternatives:

- Require revegetation and restoration efforts to mitigate the unnatural demarcation in vegetation landscapes caused by removal of or changes in the vegetation within the project area as a result of clearing and maintenance.
- Consider alternative low-impact construction techniques to minimize prominent land scarring visible to sensitive viewpoints.

For each of the visual impacts identified, the mitigation approaches discussed above were evaluated for applicability and likelihood of success. In almost all cases, the combination of existing landscape characteristics and structure prominence and visibility resulted in impacts that could not be mitigated. However, where mitigation opportunities were identified, they are discussed.

References

U.S. Department of the Interior, Bureau of Land Management (BLM). 1986. *Visual Resource Inventory Manual H-8410-1*.

_____. 1986. *Visual Resource Contrast Rating Manual 8431*.

_____. 1984. *Visual Resource Management Manual 8400*.