The following are common questions frequently asked by field personnel. This Instruction Memorandum (IM) serves as an opportunity to share these questions and answers in order to facilitate a common understanding of the Bureau of Land Management's (BLM) responsibility and consistent practice in the management of Visual Resources.

Questions regarding roles and responsibilities:

1. What is the purpose for issuing this IM?
To clarify that the Visual Resource Management (VRM) policy is not a discretionary activity, but is a mandatory land use management policy intended to be administered consistently across the bureau. This IM is intended to affirm the strength and viability of the existing VRM policy and focuses on proper and diligent implementation to avoid unnecessary resource conflicts, and better integrate visual considerations to maintain landscape character in the planning, design, and mitigation of land use activities.

The BLM is experiencing an escalation in large scale resource development activity proposals, especially in regard to renewable energy, energy transmission corridor expansion, and oil and gas. Consistent implementation of VRM policy across the BLM is important in order to protect visual resources, avoid confusion, minimize conflict, and enable industry to submit responsive development applications for timely processing.

This guidance clarifies VRM policy and procedures for consistent VRM implementation and application, as described in BLM Manual 8400 - Visual Resource Management, 4/5/1984; BLM Manual Handbook H-8410 -1 - Visual Resource Inventory, 1/17/1986; BLM Manual Handbook H-8431-1 - Visual Resource Contrast Rating, 1/17/1986; and BLM Handbook H-1601-1 - Land Use Planning, 3/11/2005.

2. What is VRM?
The VRM policy is BLM's systematic approach to inventorying and managing visual resource values, as mandated by Federal legislation. It includes the evaluation of lands for assignment of visual resource inventory (VRI) classes, as well as determination of management of visual resource values through the designation of VRM classes during the land use planning process (LUP). The VRM enables the BLM to have a system for managing the human concern for scenery and public acceptance for visible change to the natural landscape setting. Through this system, the BLM is able to objectively measure proposed landscape altering projects for compliance to visual performance standards and apply the use of good design principles to satisfy management objectives.

3. Why does the BLM manage for the "visual environment?"
The BLM is mandated by Federal legislation – the National Environmental Policy Act of 1969, and the Federal Land Policy and Management Act of 1976 - with basic stewardship responsibility to identify and protect scenic (visual) values on the public lands.

Federal Land Policy and Management Act of 1976, 43 U.S.C. 1701 et. seq.;
Section 102 (a) (8). States " . . . the public lands be managed in a manner that will protect the quality of the . . . scenic . . . values"

Section 103 (c). Identifies "scenic values" as one of the resources for which public land should be managed.

Section 201 (a). States "The Secretary shall prepare and maintain on a continuing basis an inventory of all public lands and their resources and other values (including scenic values) . . ." " This inventory shall be kept current . . ."

Section 505 (a). Requires "Each right-of-way shall contain terms and conditions which will . . . minimize damage to the scenic and esthetic values . . ."

National Environmental Policy Act of 1969, 43 U.S.C. 4321 et. seq.;
1. Section 101 (b). Requires measures be taken to "... assure for all American...esthetically pleasing surroundings ...."

2. Section 102. Requires agencies to "Utilize a systematic, interdisciplinary approach which will ensure the integrated use of...Environmental Design Arts in the planning and decision making...."

4. What program is assigned the responsibility for administering the VRM policy and program?
Lead responsibility for VRM within the BLM is assigned to the Division of Recreation and Visitor Services (DRVS). The DRVS is tasked with developing policy, guidelines, training, and overall coordination. However, implementation of the VRM policy is a shared responsibility among all programs (i.e., Range, Forestry, Minerals, Lands, Energy, etc.) that cause surface disturbing alterations, and are mutually responsible for protecting visual values. This includes ensuring that personnel in each program who are involved in activities that affect visual values are properly trained in visual management techniques, visual values are adequately considered in all management activities, and that adequate guidance and funding is available.

The policy further requires every State, District and Field Office to identify a VRM coordinator and ensure that this person, along with all individuals involved in management activities that affect visual values, are properly trained. The State Director is also to maintain a minimum of one person within the state who has the capability and expertise to provide visual design assistance on major projects and to conduct VRM training.

Questions on visual resource inventories:

5. What is a visual resource inventory?
The VRI provides BLM managers with a means for identifying and quantifying visual values. The VRI consists of a scenic quality evaluation, sensitivity level analysis, and visibility. Based on these three factors, BLM-administered lands are placed into one of four VRI classes. These inventory classes represent the relative value of the visual resources, Classes I and II being the most valued, Class III representing a moderate value, and Class IV being of least value. The inventory classes provide the basis for considering visual values in the LUP process.

6. What is the process for conducting a visual resource inventory?
Visual resources are inventoried through the systematic procedures identified in Handbook H-8410- Visual Resource Inventory. Additional guidance on using GIS technology to streamline the inventory process is described in Technical Note 407: *Integrating GIS Technologies with the Visual Resource Management Inventory Process*. Technical Note 407 provides basic guidance on conducting and maintaining a VRI using GIS support; however, it was issued in 2001 and is in need of updating to be consistent with current GIS technology and practices. The use of GIS does not replace field review and refinement, but does help streamline the inventory process. At completion, all field forms and inventory data should be transferred into GIS format for reference and data management.

A record shall be maintained of all forms and notes from the inventory.

7. What if there is no visual resource inventory in place at a Field Office area?
All Field Offices are required to have a completed and updated VRI in place before or as a part of their LUP effort. If a Field Office is without an inventory and there is no LUP update in the foreseeable future, then an inventory is still needed to process permit applications subject to VRM policy or for situations where an inventory is needed to help resolve existing LUP issues related to VRM.

8. If the Field Office needs assistance, then what are the options for getting help with a visual resource inventory?
If a Field Office is without qualified expertise to conduct a VRI, then there are qualified contractors available to assist the Field Offices. The WO-250 Division has a sample VRI Statement of Work available for the Field Offices to reference and modify for their specific needs.

The Washington Office has also identified national level internal resources available to help Field Offices with coordinating and reviewing contractors' VRM work performance, and respond to other calls for VRM technical assistance.

In the meantime, the Field Office Manager should be assigning someone with VRM responsibility and make arrangements for this person attend the VRM Training course.

9. Are there GIS Data Standards to follow when conducting the visual resource inventory?
The BLM National Operations Center is developing VRM GIS Data Standards and a geo-data base. The target completion date is the end of Fiscal Year 2009.

Questions on VRM classes and LUP:

10. What are VRM classes?
The VRM classes establish specific objectives on the management of visual values. The VRM objectives set the standards for planning, designing and evaluating future projects. The VRM class decisions need to consider the compatibility between land use activities and visual values.

11. When are VRM classes determined?
The VRM classes are determined in LUPs and decisions carried forward into the Record of Decision.

12. Are Visual Resource Inventory Classes and Visual Resource Management Classes the same thing?
No, VRI classes establish the visual resource values as explained in Question/Answer No. 5. The VRM classes set the standards for how the inventoried visual values will be managed.

13. What is the process for designating VRM classes relative to other land uses?
The LUP alternatives must include and analyze a full range of VRM classification scenarios in relationship to various land use development goals identified for the planning area. The VRM class designations, other land uses, and desirable outcomes need to be reasonably compatible with one another, and are the result of broad-scale LUP decisions that balance multiple-use objectives.

14. How flexible are the VRM class objectives when implementing to allowed uses identified in the LUP?
Once the VRM classes are assigned in the LUP, then allowable land uses are required to comport with the VRM class objectives. Therefore, it is important for the land use allocation decisions to consider the potential scale of land use development and the feasibility of conforming to the VRM class objectives.

15. Is there a recommended approach to determining compatibility between VRM class objectives and allowable land uses?
Using GIS generated three-dimensional viewshed analysis is a useful tool for determining land use suitability and compatibility. Assigning physical design parameters that represent realistic surface and vertical presence of typical facilities associated with a given allowable use will provide valuable planning insight on attaining desired future conditions.

For example, three-dimensional analysis would disclose the relationships between renewable energy activities and VRM classifications at the LUP level, and would help avert unnecessary exclusion and avoidance area designations. Conceptualizing a plausible wind energy development footprint and the necessary environmental factors for a conventional sized wind farm would lead to a rapid understanding of the landscape's ability to visually absorb this scale of activity, as well as other forms of land use.

An accurate assessment of the landscape's capacity for accommodating diverse projects at various scales of development will help the BLM with making informed decisions that will protect visual resources while advancing the need for cultivating renewable energy resources and other allowable land uses.

16. When doing a LUP revision, do the existing LUPs VRM classifications serve as the existing condition for the Affected Environment Chapter in the LUP EIS?
No, the VRI represents the existing conditions and the existing VRM class designations serve as the No Action alternative. The VRM class designation allows for a range of change to occur within the visual environment, but that does not necessarily mean that change has occurred under the LUP. The existing condition of the visual environment can only be established through conducting a new or updating an existing VRI. The inventory is the combination of the natural condition and the effects of past or current *actions*, not to be misinterpreted as past or current management *allowances*.

17. How are impacts to visual resources analyzed in the LUPs EIS?
The VRI is used for developing the EIS Chapter Three Affected Environment and serves as the baseline for evaluating the environmental consequences in Chapter Four. Environmental consequences need to be quantified through comparing the degree of allowable change of each LUP Alternative (VRM classes) to visual values (VRI Classes).

The effects analysis must also identify possible conflicts between the proposed action (and each alternative) and the objectives of Federal, State, regional, local, and tribal land use plans, policies, or controls for the area concerned (40 CFR 1502.16(c)).

18. The NEPA requires that Indirect Impacts be analyzed and disclosed. What are examples of indirect impacts associated with Visual Resources when preparing the LUP EIS?
Indirect effects are those that may occur caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. Examples may include effects on recreation, socio-economics, Native American religious rights, cultural/historic resources where landscape settings contribute to the historic significance.

19. Does assigning a VRM Class IV mean the area managed has low visual value?
No, a **VRM** Class IV does not mean the area has low visual value. The VRM Class IV means that the visible landscape will be managed for major modification. Depending on national priorities, there may be situations where areas of high and medium visual values will be managed under the VRM Class IV objective allowing for major modification. These impacts are to be visually mitigated. Mitigation of visual impacts within a VRM Class IV means to harmonize the visually dominating elements of a project in with the surrounding landscape.

Visual values are determined by conducting a VRI with **VRI** Class IV being an indication of low visual value.

20. How do you develop a range of alternatives for visual resources for LUP?
Q. The VRM alternatives development should include the No Action Alternative, which would reflect the current VRM management classes. Another alternative should reflect preservation of the inventoried visual values. This alternative and others may include management goals for reclaiming impaired lands that have affected and downgraded the scenic quality rating. The other VRM alternatives must provide for full range of VRM management scenarios to be analyzed against the range of allowable land use alternatives being considered. For instance, high wind energy areas that may have high scenic values should have alternatives that are analyzed for VRM Management Class II, III and IV.

If the current LUP is without management classes, then interim VRM management classes need to be designated to reflect existing management decisions. Project level NEPA would need to analyze and disclose the effects on the inventoried visual values relative to the interim VRM classes.

Questions on VRM LUP implementation and project evaluation:

21. When implementing LUP decisions are VRM class objectives intended to limit level of development?
No, as a general rule, the management classes are not there to prevent projects, but rather to serve as a tool for minimizing the impacts that would be created by proposed surface disturbing activities, such renewable energy development. The VRM mitigation strategies should be developed through thoughtful use of visual design tools and expertise in order to minimize visual impacts associated with a proposed activity or project.

22. What if a project does not meet the VRM class objectives?
Projects must be designed to meet the corresponding VRM class objectives. If a proposed project is found to be non-conforming with VRM objectives, then the policy provides the following options: 1) proposing additional mitigation measures, 2) relocating the project to an area with a more suitable VRM class designation, 3) not approving the project, or 4) changing the VRM classification through amending the LUP.

23. How do you evaluate projects for compliance with the RMP VRM decisions?
The BLM's visual resource contrast rating process (Handbook H-8431-1) outlines procedures for evaluating a project's compliance with the VRM objectives and lists a range of best management practices for mitigating visual impacts. Contrast rating evaluations are required for all surface disturbing projects within VRM Class I and II, and VRM III areas with high sensitivity levels. The purpose of the Contrast Rating form is not only for evaluating and documenting compliance with VRM class objectives, but also assists with developing insight on how to better design projects to minimize a project's visual contrast with the natural and cultural settings. All impacts are to be mitigated, even within VRM Class IV areas.

24. When should VRM be considered during the project planning?
The VRM class objectives serve as the performance standard for the design and development of future projects and rehabilitation guidelines for existing projects, and need to be considered early in the planning process. The Visual objectives should be integrated into the project's design criteria and should serve a meaningful role in project site selection, orientation of facilities within a selected site and in the design of the facilities' final character. Using advanced design solutions to mitigate or eliminate potential non-conformance issues is key to carrying forward proposed projects that conform to VRM class objectives.

Field managers, natural resource specialists and realty specialists should inform applicants at the early stages of communication about VRM requirements and advise them to include credentialed VRM expertise, such as a licensed landscape architect, on their planning team. Early consideration of VRM objectives and integration of VRM design strategies into plans will help avoid costly redesign and help streamline permit approval.

25. Is it good enough to meet the minimum requirements of the visual management objective?
No, the BLM should always strive to minimize adverse effects. Maximizing visual integration of facilities to reduce visual contrast regardless of the VRM objective should always be considered. Projects should go beyond simply meeting the minimum requirements of the visual management objective, especially when exceeding the management objective is easily attainable through

thoughtful design consideration and implementation of best management practices. For example, exceeding the allowable standard of major visual modification in a VRM Class IV may be as simple as properly setting an oil and gas storage tank back away from a ridge resulting in full concealment of its presence from view.

Many projects have a variety of elements that need to be considered collectively in the design and how one element may influence the visible location of another. Comprehensive design for all elements of the project should lead to solutions that maximize the opportunities for meeting VRM objectives.

26. What is the procedure for evaluating a proposed project's visual impacts when discovered that VRM classes were not incorporated into the LUP?

Field Offices without VRM class designations need to assign **interim VRM classes.** If a VRI is also missing, then the inventory is required before assigning the interim VRM classes. The inventory is necessary in order to make informed management decisions, and disclose the environmental impacts associated with those decisions.

The interim VRM class designations need to conform to the desired outcomes and allowable uses found in the LUP. A LUP plan amendment is not necessary for establishing interim VRM objectives unless the proposed project requires one. When establishing interim VRM classes, the existing allowable land uses need to be evaluated for their potential scale and character compared to the natural character of the landscape in order to determine the most compatible VRM class that will maximize protection of the visual values without prohibiting allowable uses from proceeding.

27. What if the proposed project necessitates a LUP amendment?

If it is determined that a project proposed on BLM public lands requires a plan amendment, then VRM classes should also be fully incorporated into the LUP as a part of the plan amendment. When amending the LUP, the VRM class decisions should fully consider the VRI values and the newly proposed land use in context with national management priorities, and the existing land use allocations and desired outcomes already provided for in the LUP.

For example, if a permit application for a wind energy development was submitted to a Field Office where the LUP does not anticipate wind energy development, then a LUP amendment may be required. Under this scenario, balanced consideration would be given to visual resource values and wind energy objectives when determining the appropriate VRM class designation.

28. How are cumulative effects considered for VRM?

The VRM cumulative effects are handled in the same many as other resources. When analyzing the effects associated with a specific action, the cumulative effects must consider all other activities allowed within the LUP that could occur within the viewshed of the proposed action, which may include BLM actions, and non-BLM resource and right-of-way actions that may occur on BLM-administered lands within the foreseeable future. The cumulative effects analysis should also include activities on private lands that may occur within the viewshed. This information can be obtained from local government community development departments, state

administered public utilities commissions, state departments of transportation, natural resources, outdoor recreation, etc.

29. What constitutes a viewshed?
A. A viewshed is the area seen from a particular location to the visible horizon. Delineation of the viewshed from the proposed project location must extend out from the top elevation of the proposed facilities rising at the project location expanded out to 5 ½ feet elevation above the ground of the visible horizon.

Alternatives analysis should consider ways to reduce the viewsheds. Ways to accomplish viewshed reduction may be to locate facilities away from ridgelines, away from travel corridors, reduce vertical profile of facilities (low profile storage tanks), concealing facilities behind existing facilities, or natural features.

Viewsheds may also have a sequential progression along travel corridors, for example roadways, trails, navigable rivers. If there are multiple projects of a similar nature that may result in a large cumulative footprint (large oil and gas field) or vertical profile (utility scale wind generation power plants), then the sequential progression of viewsheds may need to be considered and appropriately analyzed for cumulative effects.

30. How do we reconcile visual impacts from wind energy and other forms of renewable energy development with a Secretarial Order establishing renewable energy development as a Department of the Interior priority?
The Secretarial Order call for a "thoughtful and balanced approach to domestic resource development" and "coordinating and ensuring environmentally responsible renewable energy production and development of associated infrastructure to deliver renewable energy to the consumer." The BLM's general policy, consistent with the National Energy Policy of 2001 and the National Energy Policy Act of 2005, is to encourage development of wind energy in acceptable areas where wind energy is *compatible* with specific resource values. The BLM's Wind Energy Policy does affirm that wind energy development applications will abide by the VRM policies and guidance, and incorporate visual design considerations in order to meet VRM objectives. The Wind Energy Programmatic EIS lists visual mitigation recommendations and procedures and should be fully considered to mitigate the impacts in order to meet the RMP VRM decisions and objectives.

If project proposals are not able to be reconciled with the RMP VRM objectives, then there are other options to consider: 1) further mitigate the project design, or relocate the project to an area where the VRM class objectives can be met, 2) not approve the project, 3) change the LUP VRM decisions through an LUP amendment.

31. Why would we concern ourselves with visual issues within a VRM Class IV?
All visual adverse effects should be mitigated to harmonize with the landscape surrounding, even within an area being managed for major modification. Facilities that are going to create significant change to a landscape can be designed in context with the visible surrounding by observing and repeating natural lines, form, textures, and colors that can harmonize its visual dominance within the natural setting. It is possible and feasible to induce major modification

within an area of high scenic value and protect the scenic integrity within a VRM class IV that will serve the best interests of the BLM, private industry, and the American public.

Questions on VRM training opportunities:

32. How do those assigned to VRM responsibility get adequately trained?
All VRM leads and practitioners should attend the National VRM 5-day training course, which is held annually through the National Training Center (NTC).

33. What about VRM training if VRM is not my primary responsibility, but fall under "shared responsibility" due to the nature of our programs surface activities?
The one week VRM training through the NTC is not limited to the VRM leads, but is available to everyone interested in this subject.

Some programs include VRM as a part of their specific training modules, such as Fluid Minerals.

The VRM training is also available through a two-day short course. The short course is designed to be held at the District or Field Office reaching out to all resource programs and targeting their specific VRM issues and challenges. The BLM managers, natural resource specialists, industry people, private contractors, and others as designated by the District and Field Offices are encouraged to attend. The short course is not a replacement to the in-depth 5-day course.

The NTC also offers a course in Visual Simulation that serves as an effective tool in assisting BLM personnel with the contrast rating evaluation of proposed projects.

If interested in the above VRM courses, please contact Michael Brown at National Training Center, by e- mail at Michael_Brown@blm.gov or by telephone at 602-906-5505.

For additional technical assistance contact John McCarty, Chief Landscape Architect, by e-mail at John_McCarty@blm.gov or by telephone at 202-785-6574.