

Hells Canyon Complex Aesthetic Resource Inventory and Evaluation Technical Report E.6-3

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1. INTRODUCTION

This technical report describes a study that was commissioned by IPC and conducted by David Evans and Associates, Inc. (DEA). Its purpose was to evaluate the effects of project facilities and operations on the aesthetic environment within the study area. Because much of the public land in the study area is under Bureau of Land Management jurisdiction, the Visual Resource Management (VRM) system was used to conduct the study. VRM relies on a Visual Contrast Rating to determine the visual condition of a landscape. Project facilities and operations included transmission lines, power-generating facilities and appurtenant facilities, access and service roads, and hardscape elements. Effects of operations included reservoir and river water-level fluctuation and alterations to vegetation.

87% of the sites evaluated were determined to need some kind of mitigation to address the visual and aesthetic impacts of project facilities or operations. Specific mitigation measures were suggested. Many were determined to not be reasonable (e.g., moving transmission structures).

2. CONCLUSION

Pg. 15 – “VRI class is only one of many factors used to determine the more complex and important VRM Class designation, which provides the standard for planning, designing, and evaluating future projects.” “ VRI Class represents a categorical assessment of existing visual resources while VRM Class includes not only a consideration of VRI Class, but also other resources to determine how an area will be managed.”

Response: The BLM requested this study reevaluate the existing VRM Classifications via completion of a comprehensive inventory. IPC agreed to the additional inventory. DEA has provided their results in a separate Summary Memorandum in Appendix A and summary in Section 2.4.4.2.

Pg. 25 – “Project effects were determined first for the Current/Proposed Operations scenario, one of two scenarios that IPC has developed for its application for relicensing. The Current/Proposed Operations scenario is defined as the management regime under which the Project typically operates.”

Response: The study appears to be done with the understanding that the proposed operations are the same as the current operations, which is not the case. This makes the study unable to identify changes to the study area that would be caused by the proposed operations and compare those changes to existing and historic conditions.

Pg. 26 – “These sites are at the upstream end of the Project in a reach of the reservoir that is notably broader than the downstream reaches confined by the Canyon. The sites may not be as susceptible to water-level fluctuations as sites farther downstream.”

Response: This statement is referring to Oasis, Weiser Dunes and Farewell Bend. The assumption that they are less susceptible to visual impacts due to fluctuation is wrong.

Pg. 26 – “The Subgroup helped to develop classifications of effects and concurred with the classifications assigned in this report.”

Response: This statement is referring to the Direct Fact, Direct Hypothetical, etc. classifications. The Subgroup did not concur with all of the assigned classifications. Study results are not available to make these determinations in a conclusive manner

Pg. 29 – “In this case, the contrast ratings were typically low because the vegetation, thought to be non-native and potentially noxious, had no or weak contrast in form, line, color, and texture when viewed from the KOPs.”

Response: BLM analysis would not agree with this being no or weak contrast. When the vegetation greens up, it creates a very non-typical stripe of bright green between the water and brown upland vegetation.

Pg. 31 – “In the Brownlee/Oxbow Unit, it was most common near the upstream end of Brownlee Reservoir where lands are classified as Class II on the Idaho side of the river and Classes III and IV on the Oregon side.”

Response: The 1989 Baker Resource Area RMP has classified the Oregon side as Class II along Brownlee Reservoir as far south as Spring Recreation Site. Malheur Resource Area has inventoried their public lands south of Farewell Bend as Class III. Even though the reevaluation inventoried the Baker lands at a lower class, no management decision has been made regarding changing the VRM management objectives.

Pg. 33 & 34 – “Provide education and interpretive signage and/or facilities where other measures are not reasonable.” “It must be noted that the climate in the Study Area is exceptionally harsh and establishing vegetation may not be reasonable in some areas.”

Response: The decision of what is unreasonable may have been made too hastily and possibly inappropriately. Although common sense is expected to be used when making recommendations for mitigation measures, the determination of what is unreasonable can be debated. The process for making this determination is not made clear.

3. STUDY ADEQUACY

IPC generously agreed to conduct a new Visual Resource Inventory along the reservoirs within this study. “In all instances, the reevaluation resulted in lower (i.e., less restrictive) VRI Classes.” It must be remembered that VRI does not equal VRM. As stated above (Pg. 15), VRM takes into account all the resources. BLM management has not assessed the reevaluation by DEA nor made a determination regarding changing the current VRM Class.

This study compares two flow scenarios that were defined by IPC, the current/proposed operations scenario and the Full Pool Run-of-River scenario. This is a very limited range of flow scenario alternatives and does not represent options that could be beneficial to ecological functions and landscape character. Several other scenarios were chosen to be modeled and analyzed, however only these two were considered in this study. It appears that the study is limited by the number of flow scenarios that were compared.

This study addresses attainment of visual resource management objectives as defined in the Visual Resource Management system. However, the designation of direct hypothesis related to impacts that may or may not be caused by IPC operations is a designation that points to the need for related data to sufficiently determine whether IPC operations are in fact impacting aesthetic resources.

The attainment of visual resource management objectives was rated at Known Observation Points (KOPs). Many of these sites were rated below the recommended objective and recommendations were made for improvement. Many places in the study were not rated for visual contrast because those sites were not determined to be KOPs. It may be inferred that those places are not considered KOPs because of the existing high contrast. Broader, more encompassing areas may be necessary to address places that could be or would be KOPs if aesthetics were appropriately addressed.

4. BLM CONCLUSIONS AND RECOMMENDATIONS

This study is adequate in most part, however there are questions that are left unanswered.

1. Direct hypotheticals need to be determined fact or not fact before this study can adequately evaluate the need for mitigation measures.
2. The judgment of reasonable or unreasonable mitigation measures is not sufficiently determined.
3. A limitation of this study regarding the two chosen flow scenarios is a serious omission of a no action alternative. A current operations flow scenario and the related impacts need to be compared to the proposed operations, a full pool/run of river scenario and other scenarios that would address other resource issues. The recommended mitigation measures are limited by some inaccurate assumptions that the current and proposed flow scenarios are the same.

4. The recommended mitigation measures are limited by inaccurate assumptions regarding the impacts of drawdowns on upstream sites and invasive vegetation.