

# Viejas Hotel South Tower Project Draft TEIR

## Appendix F

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### Visual Impact Analysis

*Prepared by BRG Consulting, Inc.*

*March 2014*

# Visual Impact Analysis

for the

# Viejas Hotel South Tower Project

prepared for the

**Viejas Band of Kumeyaay Indians**

5000 Willows Road

Alpine, CA 91901

prepared by

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304 Ivy Street

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March 2014

# 1.0 INTRODUCTION

## 1.1 Purpose of this Report

The purpose of this report is to assess potential visual impacts associated with the proposed Viejas Hotel South Tower project, to determine the significance of such impacts, and to propose measures to mitigate any identified significant impacts.

## 1.2 Key Issues

Key issues addressed include:

- the area from which the proposed hotel may be visible (viewshed);
- the presence of any documented sensitive viewpoints within the viewshed;
- the visibility of the proposed project from such sensitive viewpoints;
- visual character and visual quality of the existing view from sensitive viewpoints from which the hotel would be visible;
- anticipated viewer response to views from which the hotel would be visible;
- anticipated changes in visual character and quality from visible viewpoints;
- anticipated viewer response to visible changes in visual character and quality.

## 1.3 Principal Viewpoints to be Covered

As described in Chapter 3 of this report, although the area within which the proposed hotel could be viewed is quite large, there are only a few public roads or trails identified as potentially sensitive visually within that area, including Willows Road and Interstate-8 (I-8). Specific viewpoints from which the hotel would be visible are identified in Chapter 3 of this Visual Impact Analysis.

## 1.4 Visual Analytic Approach

The approach used in this analysis is consistent with visual concepts outlined in visual analytic guidance from the U.S. Bureau of Land Management (1978), the U.S. Forest Service (1979), the Federal Highway Administration (1988), and the California Public Utilities Commission (2004). This report follows topic headings identified by the County of San Diego in their Report Format and Content Requirements: Visual Resources, July 30, 2007.

# 2.0 PROJECT DESCRIPTION

## 2.1 Proposed Project

The regional map showing the project location is provided in Figure 1, while Figure 2 shows the project location relative to an aerial photo of Viejas Reservation and vicinity. The proposed hotel would be six-stories, or

approximately 72 feet in height (2,395.40 feet above mean seal level [AMSL]) with the highest point of the structure being the elevator tower at 78 feet above the first floor (2401.40' AMSL). The proposed hotel would be located immediately adjacent to the existing casino and parallel to the existing five-story hotel, located northeast of the existing casino area. The proposed project site plan and hotel "footprint" is shown in Figure 3. In addition, as shown in Figure 3, the proposed hotel would be part of a larger commercial complex that includes the Viejas Outlet Center south of the Casino and south of Willows Road. Existing square footage of the Outlet Center is approximately 255,000 SF, and the overall complex totals approximately 850,000 SF. As shown in Figure 3, the Viejas Hotel South Tower would be built in the area currently used as office space and surface parking. The detailed hotel design is still in preparation. The building surface is expected to be an earth tone consistent with colors of the existing casino and hotel structures. It would be lit at night, but be consistent with County of San Diego lighting ordinance policies.

## 2.2 Land Use Designations and Zoning

The proposed hotel location is part of the Viejas Reservation commercial complex adjacent to Willows road. The Reservation, being a sovereign entity, is not subject to County of San Diego land use or zoning designations.

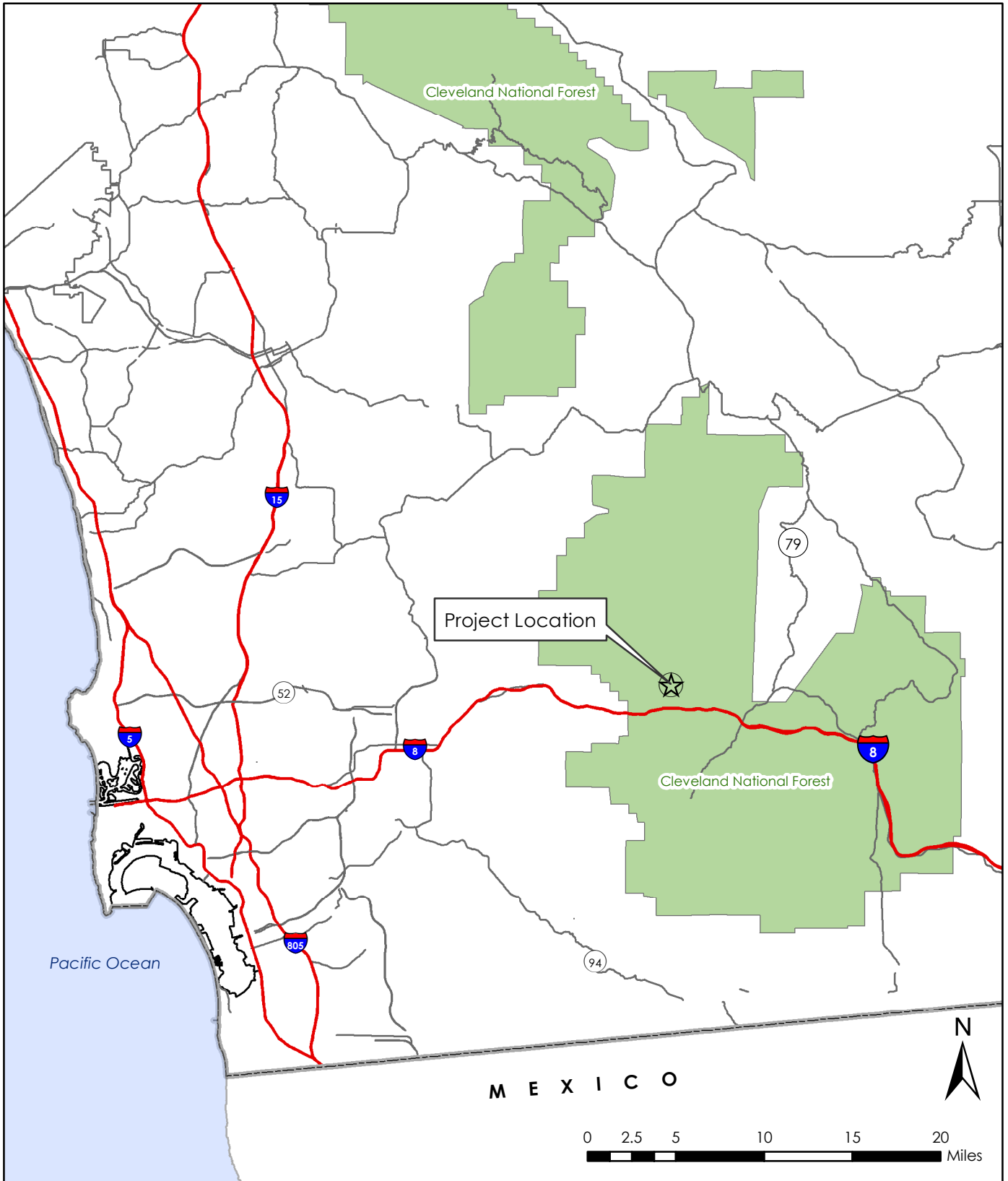
## 2.3 Regulatory Framework

Given the sovereign nature of the Reservation, most of the regulatory framework documents listed on page 3 of the County's Visual Resources Report Format and Content Guidelines are not applicable to this project. However, aspects of the Alpine Community Plan, the Scenic Highway Element, and some nearby recreational trails listed in the County's Community Trails and Pathways plan are applicable to lands outside but near the Reservation. The primary regulatory document applicable to this project is the 2004 Amendment to the Tribal-State Compact between the State of California and the Viejas Band of Kumeyaay Indians, and Exhibit A to that document. The latter exhibit details the environmental topics that must be addressed in a Tribal EIR, or TEIR. Visual topics listed in Exhibit A come from Appendix G of the California Environmental Quality Act (CEQA) Guidelines, and include...

- A. *"Would the project have a substantial adverse effect on a scenic vista?"*
- B. *Would the project substantially damage off-reservation scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? And*
- C. *Would the project create a new source of substantial light or glare, which would adversely affect day or nighttime views of historic buildings or views in the area?"*

## 2.4 Design Policies and Guidance

There are no design policies or guidance applicable to the project.



SOURCE: SanGIS, 2014

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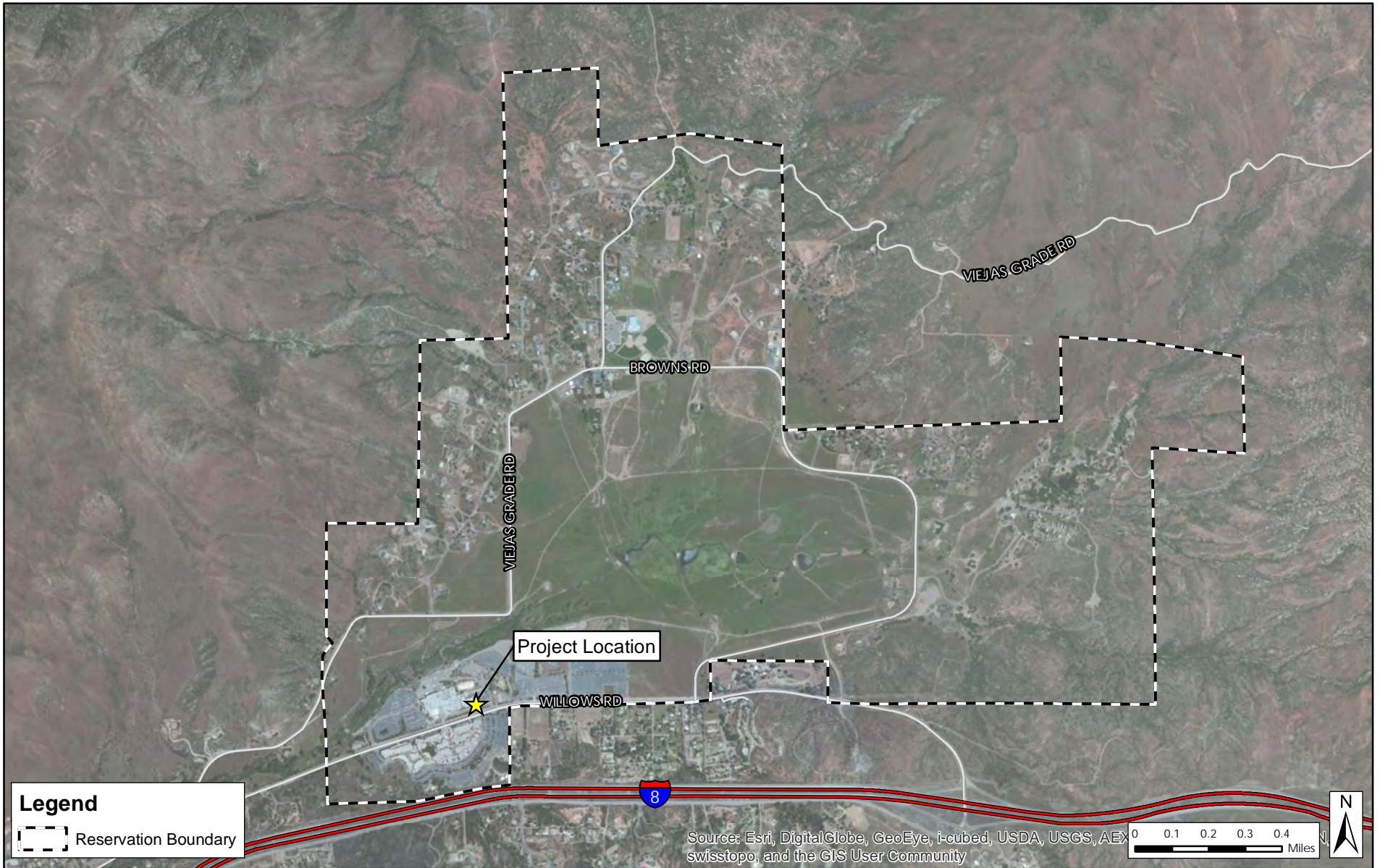


Viejas Hotel South Tower - Visual Impact Analysis

Project Location

FIGURE

1



SOURCE: Esri, 2014; SanGIS, 2014

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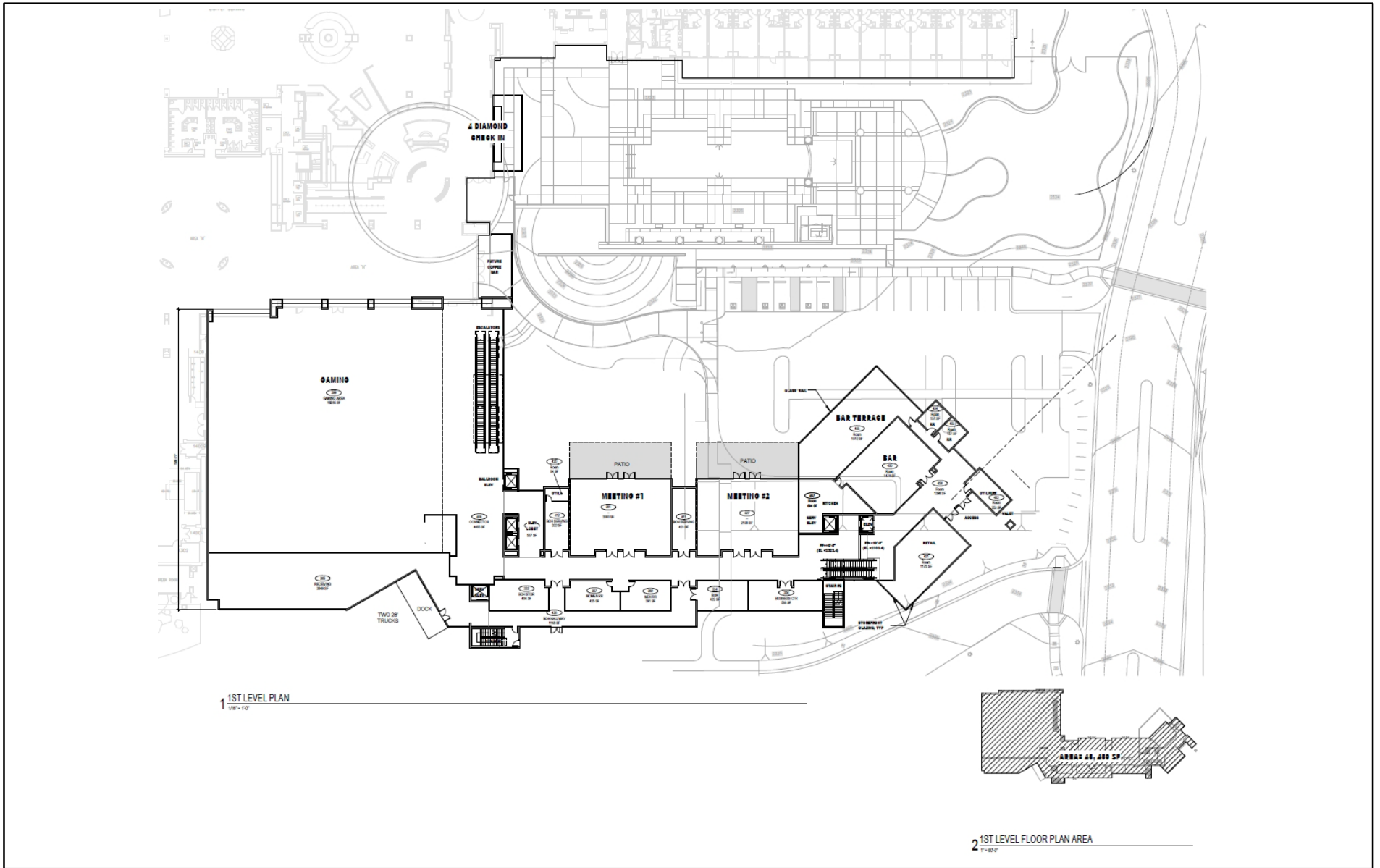
Viejas Hotel South Tower - Visual Impact Analysis

Local Vicinity

FIGURE

2





SOURCE: JCJ Architecture, 2013

1/6/14



Viejas Hotel South Tower - Visual Impact Analysis  
 Proposed Site Plan

FIGURE  
 3

# 3.0 VISUAL ENVIRONMENT OF THE PROJECT

## 3.1 Project Setting

The site for the proposed hotel is within Viejas Valley, immediately adjacent to the existing Casino on the northeast, and across Willows Road from the existing Viejas Outlet Center. The existing Casino/Outlet Center complex contains approximately 850,000 SF of developed space, in structures ranging from 30 to 65 feet in height. The existing buildings at the Casino and Outlet Center are painted a variety of earth-tone hues. Elevation of the proposed hotel site is at 2,323 feet AMSL. Existing surface parking lots and access roadways are adjacent to the proposed site on the north, east and south. As shown in Figure 3, riparian lands associated with Viejas Creek border the existing hotel site to the north. Beyond the creek riparian zone are grasslands where cattle and horses owned by Tribal members graze (see Figure 2). Viejas Grade Road passes through this area, from its intersection with Willows Road a few hundred feet west of the Reservation boundary. After leaving the north edge of the Reservation, Viejas Grade Road proceeds on to Descanso, and to Descanso Junction. The road is maintained by San Diego County as an unpaved road for six miles or more, and then as an asphalt-paved road to Descanso. Beyond Viejas Grade Road, and its tributary Browns Road, there are areas of Tribal member housing. Outside the Reservation, there are a few scattered private homes; many of them are currently owned by Viejas. Finally, beyond the Tribal and other private homes, the topography rises to Viejas Mountain to the northwest, with an elevation of 4,187 ft AMSL; to Poser Mountain to the northeast, elevation 3,917; and Chiquito Peak to the east, elevation 4,127. Most of these more rugged lands are under the jurisdiction of the U.S. Forest Service (Cleveland National Forest).

South and southwest of the proposed hotel site is located Willows Road, and the Viejas Outlet Center. To the southeast are private residential properties on 5-10 acre parcels, as well as an existing commercial "Trading Post." The four-lane I-8 highway passes to the south approximately 1,500 feet from the site, and on the south side of I-8 are low-density residential lands. Farther south are additional lands that are part of Cleveland National Forest. I-8 is not designated as a state scenic highway, but has been identified in the Alpine Community Plan as a "Second-Priority Scenic Route," according to the San Diego County General Plan (2011).

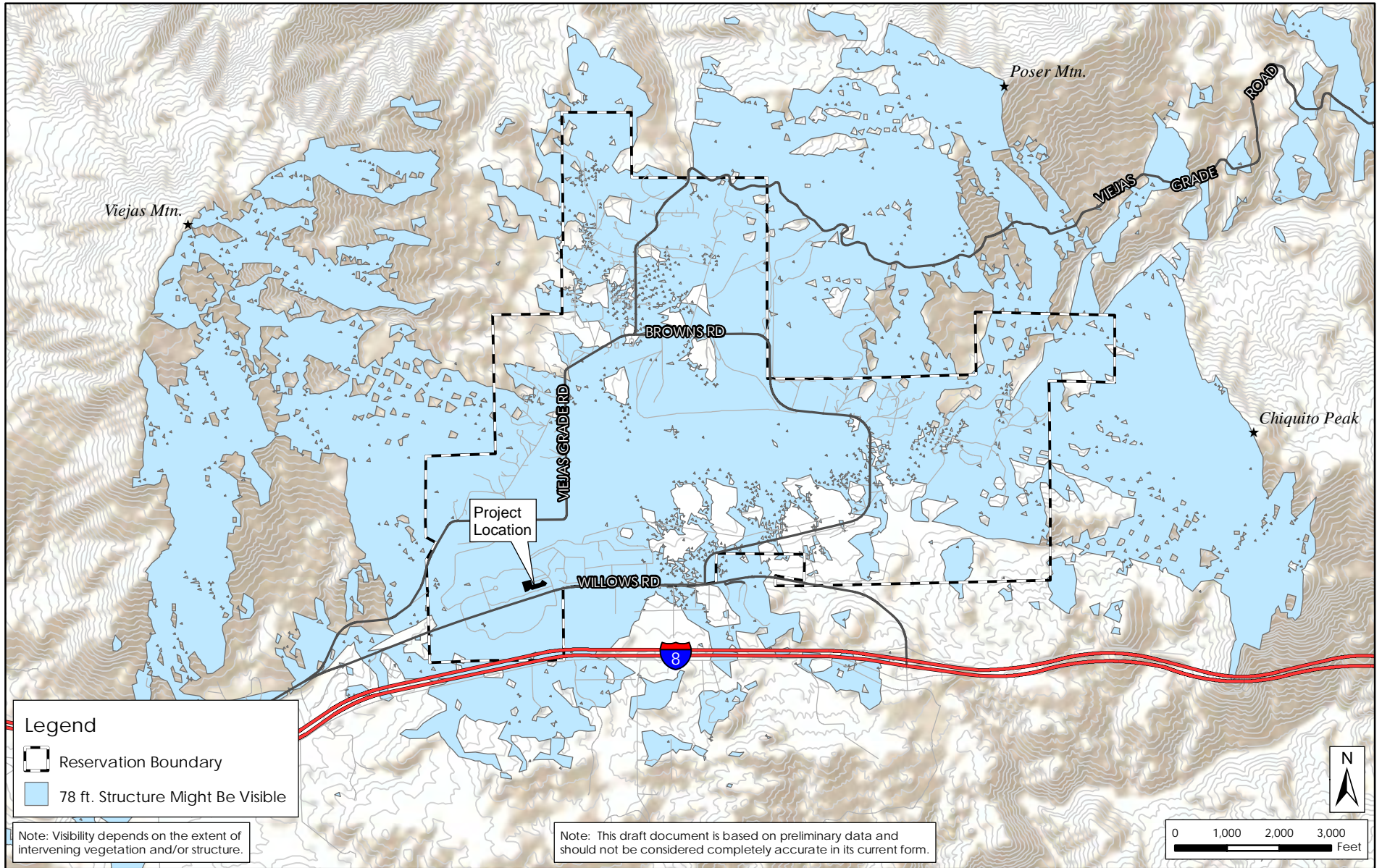
## 3.2 Project Viewshed

The proposed hotel would be up to approximately 78 feet higher than the existing site grade. A visibility analysis of the proposed hotel was prepared, addressing the visibility of a structure that is 78 feet high in order to accommodate for the elevator tower. The analysis was prepared on the BRG GIS system, and utilized a digital elevation model (DEM) of the nearby topography, based on USGS quadrangle maps and topography with an interval of 40 feet. The analysis shows the maximum possible visibility of the proposed hotel, with no screening or blocking of views by existing vegetation or structures. The results are shown in Figure 4.

## 3.3 Landscape Units

Generalized landscape units within the viewshed are shown in Figure 5, derived from an existing vegetation map provided by SANGIS. The generalized units are overprinted with hatched areas showing the areas within which the proposed hotel would be visible (assuming no blockage by existing vegetation or other structures).





SOURCE: BRG Consulting, Inc., 2014

2/25/14



Viejas Hotel South Tower - Visual Impact Analysis

Visibility Analysis

FIGURE

4

## 3.4 Landscape Units

Generalized landscape units within the viewshed are shown in Figure 5, derived from an existing vegetation map provided by SANGIS. The generalized units are overprinted with hatched areas showing the areas within which the proposed hotel would be visible (assuming no blockage by existing vegetation or other structures).

# 4.0 EXISTING VISUAL RESOURCES AND VIEWER RESPONSE

## 4.1 Existing Visual Resources

### 4.1.1 Visual Character

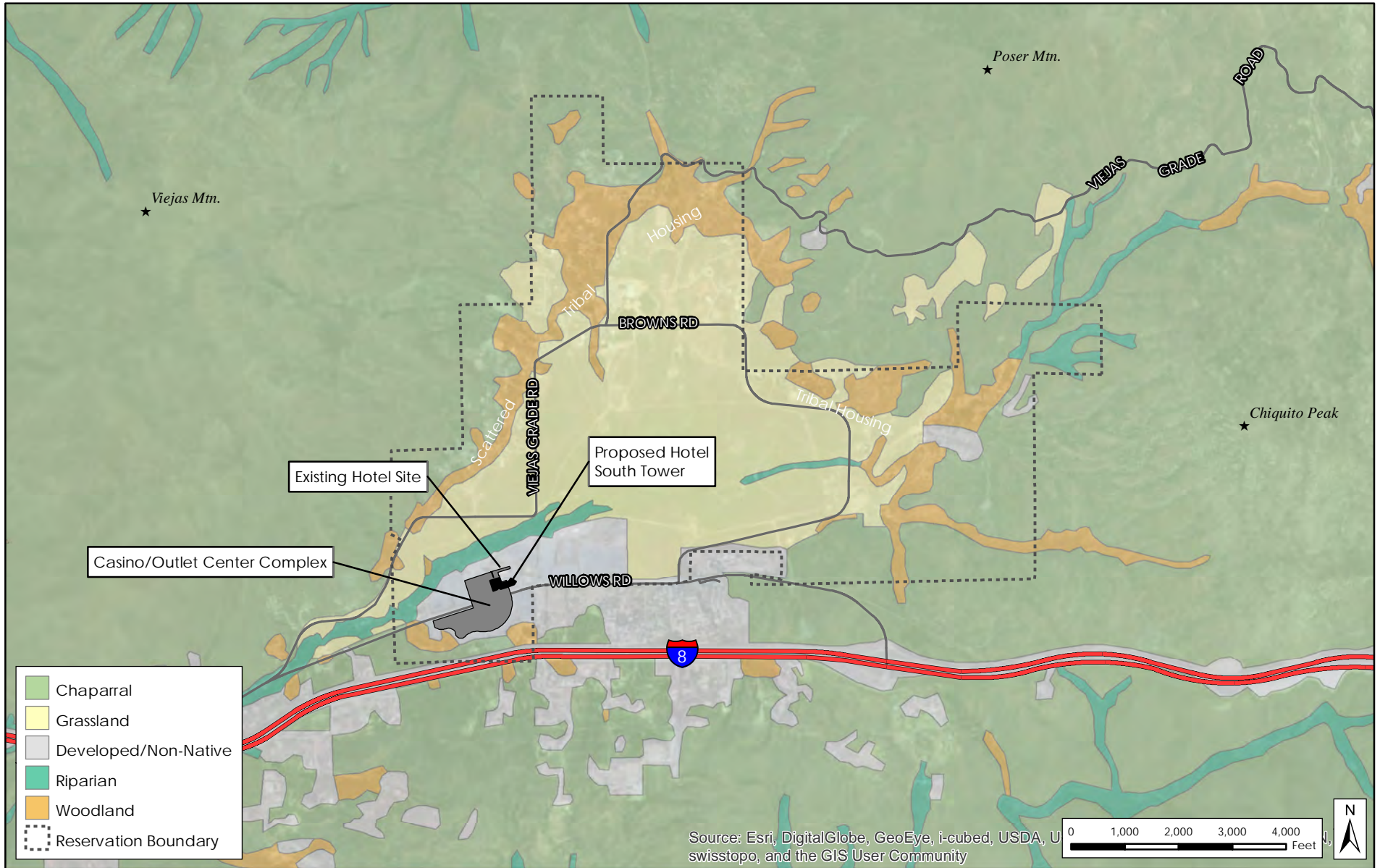
The visual character of the proposed hotel site is that of an existing commercial and hotel development, integrated visually by the scale of structures ranging in height from 30 to 65 feet, and displaying a palette of earth-tone colors. The structures themselves are surrounded by extensive surface parking lots for visitors and employees, as shown in Figure 2. The landform at the site is flat, with no rock outcroppings or vegetation patterns other than landscape plantings. The site is south of the existing Viejas Creek, which has been enhanced by additional plantings of riparian plants.

The visual character of the general site vicinity is that of a grass-covered valley, surrounded by a circle of chaparral-covered hills and mountain slopes, presided over by Viejas Mountain to the northwest, Poser Mountain to the northeast, and Chiquito Peak to the east, as shown in Figure 5. Adjacent to the grasslands are gentle slopes that contain oak woodlands and scattered residential areas for Tribal residents. Non-Indian homes in the vicinity are concentrated along Willows Road west of the Reservation, and a small number of non-Indian homes are located to the northeast of the Reservation and southeast of the Reservation both to the north and south of I-8.

### 4.1.2 Visual Quality

The relationships and connections between the various visual considerations addressed in this visual analysis are shown in diagrammatic form in Figure 6, with the analytic flow proceeding from top to bottom. The visual quality of the project viewshed can be characterized as “representative” of the Lower Californian physiographic province, as described by Nevin Fenneman in 1946. The original granite uplands, intervening valleys, chaparral-covered hillsides, oak groves and grasslands remain, but there has been scattered human development in the area including I-8; various County roadways (Alpine Boulevard, Willows Road, Viejas Grade Road); both Tribal and non-Indian residential development, most of the latter being located near I-8; and the Casino/Hotel/Parking Structure/Outlet Center development. The most distinctive natural visual element within the viewshed is the presence of solitary Viejas Mountain, although the granitic boulders of Chiquito Peak east of the Reservation have their own local distinctiveness. The Viejas Casino, Hotel, Parking Structure, and Outlet Center complex is the most distinctive man-made visual element within the viewshed.





SOURCE: SanGIS, 2014; BRG Consulting, Inc. 2014

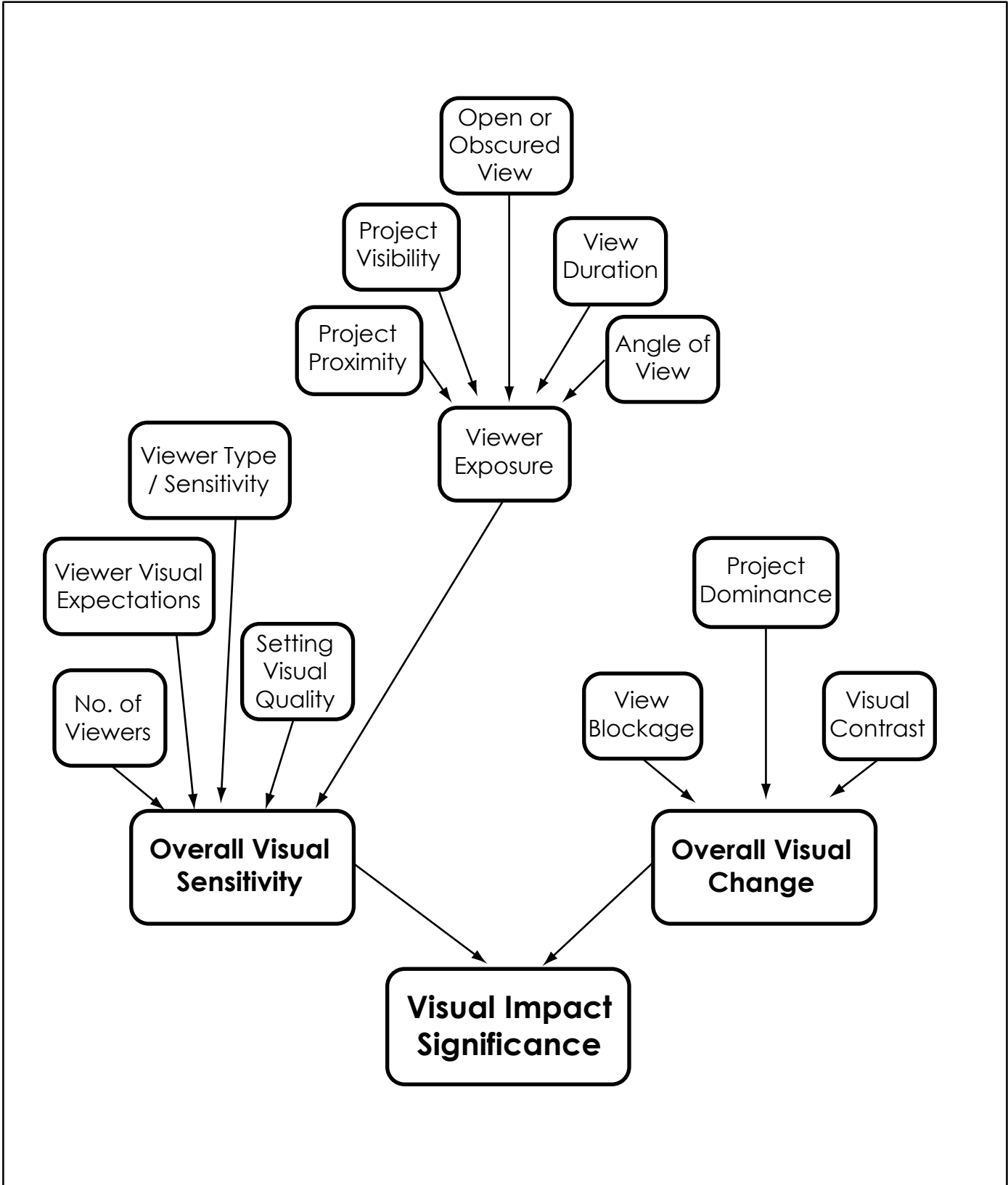
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Viejas Hotel South Tower - Visual Impact Analysis

## Generalized Landscape Units Within Project Area

FIGURE  
5



SOURCE: BRG Consulting, Inc., 2014

2/25/14

## 4.2 Viewer Response

### 4.2.1 Viewer Sensitivity

The Alpine Community Plan indicates that the visual quality of the landscape is important, especially protection of scenic ridgelines and natural oak groves (Alpine Community Plan, p. 5). The plan also indicates that it is the community intent to keep residential and agricultural areas of Alpine free from industrial and major commercial encroachments. The Resource Conservation appendix of the plan (p. 40) indicates that lands at Viejas Mountain, Viejas Indian Reservation, and Poser Mountain, all in the vicinity of the proposed project, should be conserved in order to protect valuable resources. According to the appendix, Viejas Mountain is valuable as a local “aesthetic landmark”, for its undisturbed chaparral habitats, and three specific rare plants. Poser Mountain has similar resources, although it is not named as an “aesthetic landmark.” Finally, Viejas Indian Reservation is noted for its high concentration of known and other unknown archaeological sites. Viejas Creek, to the west of the Reservation, is identified for conservation of its perennial stream and aquatic ecosystems, adjacent to oak and riparian woodlands. In apparent contrast to the Alpine Community Plan, the County is processing a General Plan Amendment for the Forrest Conservation Lands in the vicinity that would allow substantial new commercial and residential development.

No state-designated scenic highways are located in the Alpine Community Plan area, but I-8, which bisects the Community Plan area, is identified as a “second priority” scenic route per County analysis. The Scenic Highways chapter goes on to identify the following “scenic view corridors” within the boundaries of the Community Plan:

- From I-8 toward El Capitan Reservoir
- East and west views of Viejas Mountain from I-8; and
- From I-8 south along the Sweetwater River.

### 4.2.2 Viewer Groups

Based on the discussion in Section 4.2.1 above, two groups of potentially-sensitive viewers from public lands or facilities have been identified. These include travelers westbound on I-8 passing the existing Casino and travelers heading westbound on Willows Road near the nearest non-Viejas owned private property, the “Trading Post.”

Other than the top of Viejas Mountain, there are no other visually-sensitive public park or vista areas within the project viewshed from which viewers could see the proposed hotel. In the case of Viejas Mountain, the access trail approaches the peak from the west, and only from the very top would hikers would have an obstructed and minimal view of the project, from a distance of approximately 1.75 miles. From that distance, although the top of hotel south tower would be slightly visible, it would be seen only as a part of the existing commercial and hotel complex and would be primarily blocked by the existing commercial and hotel complex.

It is expected that owners of some private homes near Viejas would be able to see the proposed hotel. However, these views represent private views that are not protected under County procedures, unlike those from public parks or roadways.

### 4.2.3 Viewer Exposure

Viewer exposure is a composite of the visual factors visibility, viewing distance, viewing angle, extent of visibility, and duration of view. However, the initial key question from sensitive potential viewpoints is “Would the project be visible?” Photos were taken toward the proposed hotel site from I-8 and Willows Road from the viewpoint locations shown in Figure 7. Viewpoints from which the proposed hotel site would not be visible or very minimally visible are VPs A, B, D, E, F, G, H, I, and J. Photos taken from these locations are provided below in Figures 8, 9, 10, and 11. Photos taken from locations from which the hotel site would be visible are provided in Figure 12 and Figure 13 (VP-C and VP-K), which include views from Willows Road and I-8.

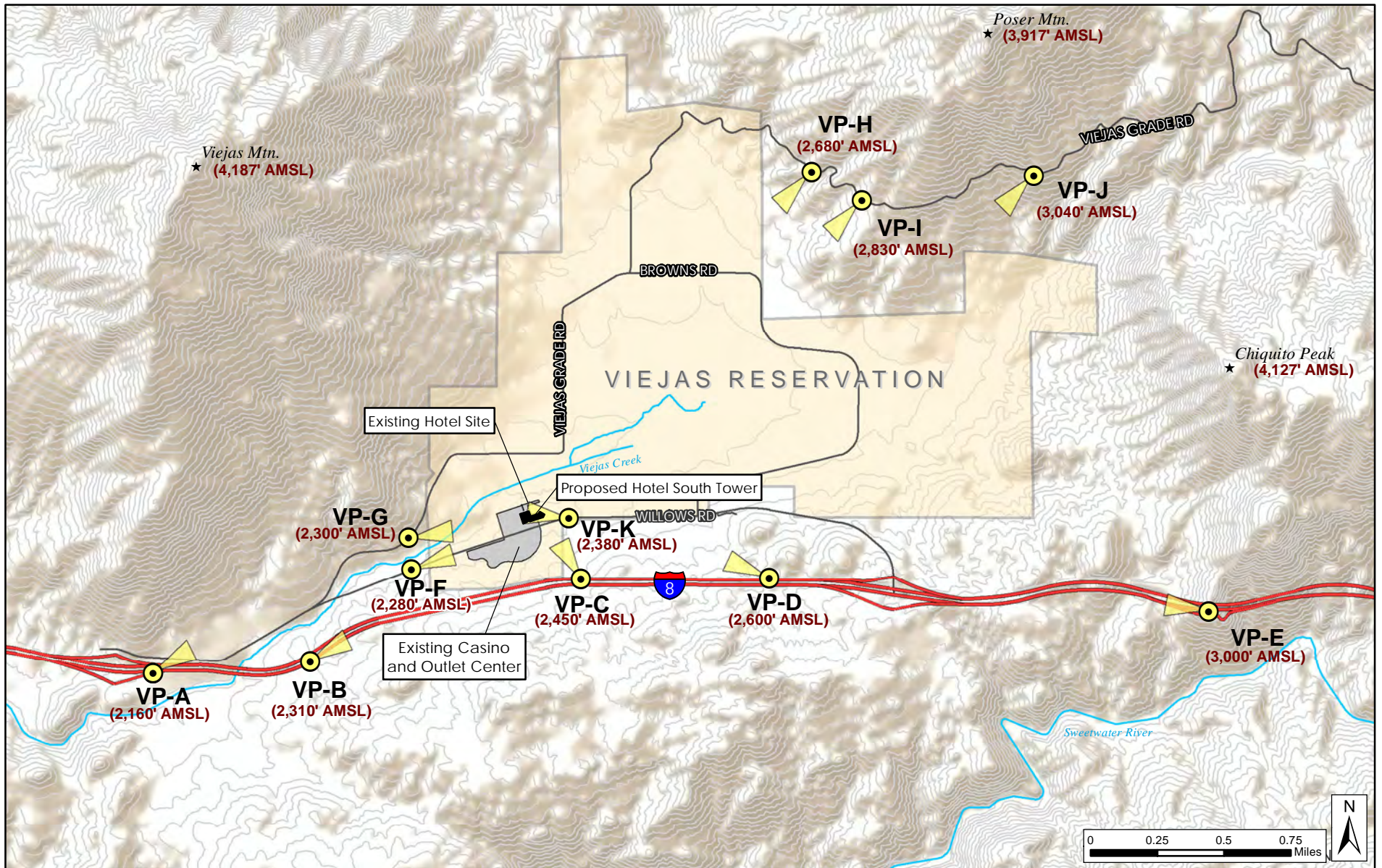
Once the viewpoints from which the proposed project would be visible are identified, an analysis can be prepared to address anticipated viewer exposure. This analysis is shown below in Table 1, in both qualitative and numerical terms, for views from VP-C and VP-K.

### 4.2.4 Viewer Awareness

Viewer awareness of the proposed visual changes would vary greatly by the type of viewer, and the degree of the hotel’s visibility. For example, along I-8, from VP-C, many potential viewers would be commuters, travelling the same route for long periods of time. In such a situation, the viewers initially may notice the changes, but that awareness would decrease over the ensuing months and years. Other travelers on I-8 include commercial truckers, with likely little awareness of the project. New travelers along I-8, such as first-time tourists to the area, may be more receptive or interested in the visual changes, but they would have little basis of comparison regarding the prior views that existed. In addition, for all of these viewers, the duration of view is expected to be five seconds or less.

Willows Road is primarily used as access for the residents of Viejas Indian Reservation and visitors of the Viejas Casino and Resort. The viewpoint of concern lies east of the Reservation along Willows Road, near the Trading Post. Willows Road primarily serves residents of the Reservation and visitors to the Viejas Casino & Resort. From this vantage point, travelers along Willows Road are focused on the overall existing commercial development, which lies ahead of them to the west. This vantage point towards the proposed hotel site is partially obstructed by distant tall trees. The duration of the view is expected to be ten seconds or less from this viewpoint.





SOURCE: Esri, 2014; SanGIS, 2014; BRG Consulting, Inc., 2014

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Viejas Hotel South Tower - Visual Impact Analysis

Proposed Location, Potential Viewpoints (VPs), and Topography

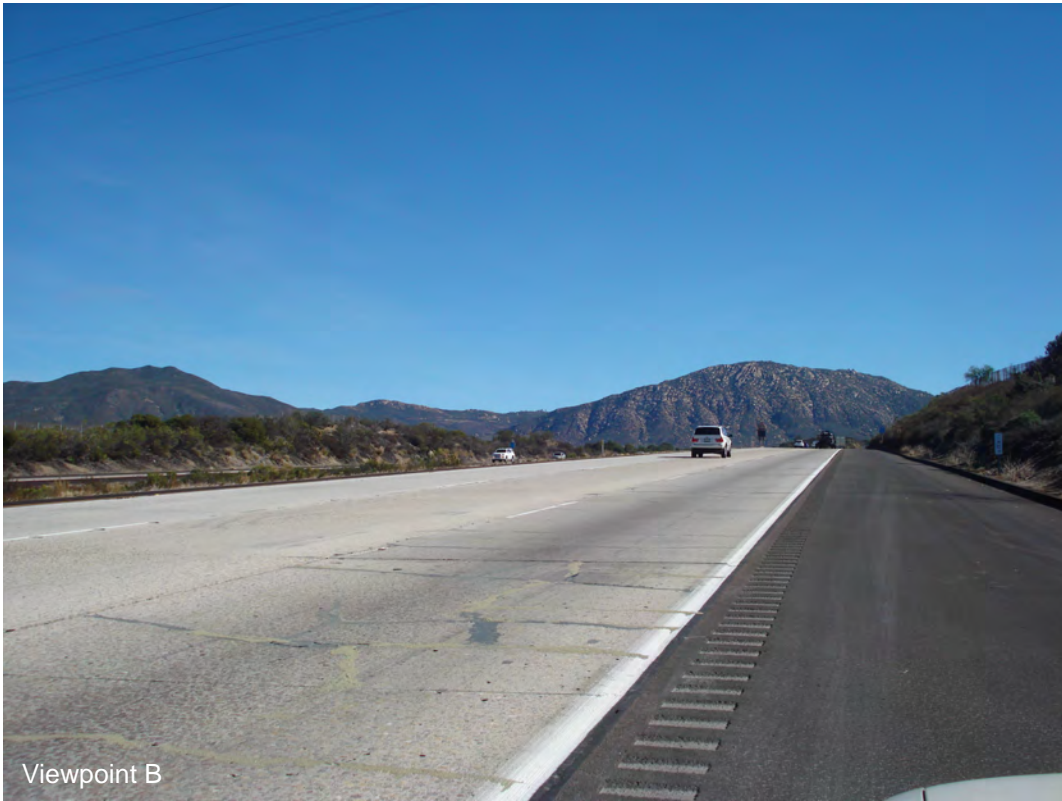
FIGURE

7





Viewpoint A



Viewpoint B

SOURCE: BRG Consulting, Inc., 2014

2/20/14



Viejas Hotel South Tower - Visual Impact Analysis

Photos from Viewpoints A & B

FIGURE

8



Viewpoint D



Viewpoint E

SOURCE: BRG Consulting, Inc., 2014

2/20/14



Viejas Hotel South Tower - Visual Impact Analysis

Photos from Viewpoints D & E

FIGURE

9





Viewpoint F



Viewpoint G

SOURCE: BRG Consulting, Inc., 2014

2/20/14



Viejas Hotel South Tower - Visual Impact Analysis

Photos from Viewpoints F & G

FIGURE

10





Viewpoint H



Viewpoint I



Viewpoint J

SOURCE: BRG Consulting, Inc., 2014

2/20/14



Viejas Hotel South Tower - Visual Impact Analysis

Photos from Viewpoints H, I & J

FIGURE

11





SOURCE: BRG Consulting, Inc., 2014

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Viejas Hotel South Tower - Visual Impact Analysis  
Existing Conditions and  
Visual Simulation of Viewpoint C

FIGURE  
12





Viewpoint K (Existing Conditions)



Viewpoint K (Photosimulation)

SOURCE: BRG Consulting, Inc., 2014

3/6/14



Viejas Hotel South Tower - Visual Impact Analysis  
Existing Conditions and  
Visual Simulation of Viewpoint K

FIGURE  
13

**TABLE 1**  
**Viewer Exposure Analysis of Proposed Viejas Hotel South Tower**

Visual Analysis Factors	Description of Visual Factors Regarding Views of the Proposed Hotel South Tower Site from I-8 Viewpoint VP-C	Qualitative Rating	Numerical Score
Project Visibility	High, if viewer is stationary; low if the viewer is in rapid motion (highway speeds).	L	1
Project proximity to viewer	The proposed new hotel site is within 1500 feet of I-8; this is typically considered a “foreground” view (< 0.5 mi.).	H	5
Angle of view	The viewer elevation is approximately 182 feet above the base grade of the proposed hotel site. The hotel site is back-dropped by other landscape elements behind it, not silhouetted against the sky. This is called a “superior” view (viewed from above). In addition, the view of the hotel site is off to the right side, not immediately in front of vehicle occupants.	ML	2
View open or obscured	The view of the proposed hotel site from I-8 is obscured by topography and trees.	ML	2
Duration of view	The hotel site is visible for less than five seconds from vehicles travelling at 65mph on I-8. This is considered a low duration.	L	1
<b>Viewer Exposure Summary</b>	This factor is a <b>composite of the five factors listed above</b> . Based on the numeric scores listed above, the sum of the factors would be 18.5, with an average score of 3.7 (18.5 divided by 5). In qualitative terms, viewer exposure would be characterized as “moderately low.”	<b>ML-M</b>	<b>2.2</b>
Visual Analysis Factors	Description of Visual Factors Regarding Views of Proposed Hotel South Tower Site from Willows Road Viewpoint K	Qualitative Rating	Numerical Score
Project Visibility	Moderately-Low, if viewer is stationary or in motion. Viewer would be moving at a moderate speed, but because Willows Road has mature trees along either side of it, the visibility would be changing.	ML	2
Project proximity to viewer	The proposed hotel location is approximately 1,000 feet from the identified location along Willows Road.	M	3
Angle of view	The viewer elevation at this location is similar to the base grade of the proposed hotel site. The hotel site is obstructed by other landscape elements in front of it and silhouetted against the mountain.	M	3
View open or obscured	The view from Willows Road east of the Reservation is primarily obscured by mature trees. The hotel site is obstructed by other landscape elements in front of it and silhouetted against the mountain.	ML	2
Duration of view	The hotel site is visible for substantial ten seconds or less time periods.	MH	4
<b>Viewer Exposure Summary</b>	This factor is a <b>composite of the five factors listed above</b> . Based on the numeric scores listed above, the sum of the factors would be 14, with an average score of 2.8 (14 divided by 5). In qualitative terms, viewer exposure would be characterized as “moderately-low.”	<b>ML-M</b>	<b>2.8</b>

Notes: Numerical Scores: Low = 1; ML = 2; Moderate = 3; MH = 4; High = 5  
Source: BRG Consulting, Inc., 2014

## 5.0 VISUAL IMPACT ASSESSMENT

### 5.1 Guidelines for Determining Significance

As stated earlier, in Section 2.3, the visual impact significance criteria listed in Exhibit A of the 2004 Amendment to the Tribal-State Compact between the State of California and the Viejas Band of Kumeyaay Indians are as follows:

- A. *“Would the project have a substantial adverse effect on a scenic vista?”*
- B. *“Would the project substantially damage off-reservation scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?”*
- C. *“Would the project create a new source of substantial light or glare, which would adversely affect day or nighttime views of historic buildings or views in the area?”*



## 5.2 Key Views

The “key views” for this analysis are the only visually-sensitive viewpoints from which the proposed hotel south tower would be visible from a short portion of I-8 WB (VP-C) as shown in Figure 12, and Willows Road WB(VP-K) shown in Figure 13.

## 5.3 Assessment of Visual Character and Visual Quality Changes

### 5.3.1 Visual Character Changes

The proposed new hotel south tower form is more vertical, and of a larger scale than that of the existing Casino structure it will replace and the neighboring casino structure, but is similar to the existing hotel’s bulk, scale, height, and style which parallels to the north. The existing Casino development is much larger than the hotel in terms of square footage and façade facing both Willows Road and I-8. The hotel structure would be visually dominant as the viewer approaches from the east on I-8 or Willows Road; however, it does add diversity to the structural forms that exist at the complex. The hotel color would be consistent with those of the existing casino complex.

### 5.3.2 Visual Quality Changes

The new hotel would add visual variety to the forms of the existing casino complex. There would be no changes to any other landscape unit in the viewshed.

## 5.4 Assessment of Viewer Response

### 5.4.1 View from I-8

The proposed hotel south tower would be seen by approximately 34,500 viewers per day on westbound I-8; however, views of the proposed hotel would blend with the other structures on site and most viewers would not find the structure of strong visual interest (CALTRANS, 2014). Each would have a short duration of view (less than five seconds). The dominant view elements at the time of the photograph included Viejas Mountain and the Viejas commercial complex, as shown in Figure 12. The new hotel south tower would be consistent in color with the existing Casino structures; although it would be larger/taller than many existing structures, it would be a small part of a much-larger commercial complex, and the view of it would be partially screened by nearer vegetation. The hotel south tower would not block views toward any visually-important element.

### 5.4.2 View from Willows Road (Near Trading Post)

From this viewpoint, the proposed hotel south tower would be considerably blocked by existing mature trees. As the viewer moves west and approaches the proposed project site from the east, the viewer would have mostly unobstructed views to the new hotel south tower. The proposed hotel south tower would dominate the viewshed as the viewer approaches the project site from the east; however, the new hotel south tower would be consistent in color with existing structure and provide diversity to the existing structural forms that make up the Viejas commercial complex. The dominant view elements from Willows Road would be Viejas Mountain to the right, Viejas surface parking lots in foreground to the right, and undeveloped parcels to the west (see Figure 13). The new hotel

south tower would be consistent in color with existing structures, and, although it would be larger/taller than existing structures, it would not be a dominant visual element to the viewer from this viewpoint due to the obstructed view towards the new proposed project. Each viewer would have a short duration of view (less than ten seconds).

### 5.4.3 Visual Sensitivity and the Anticipated Degree of Visual Change

Considerations of visual sensitivity and the degree of visual change as viewed from each of the two key viewpoints are summarized in Tables 2 (I-8) and Table 3 (Willows Road). The various factors addressed include those depicted in diagrammatic form previously in Figure 6. Each factor is assigned a qualitative rating (high, moderate, low, etc.), and a corresponding numerical score. When the ratings/scores for visual sensitivity and visual change are compiled, the applicable scores are added, and the sum divided by the number of factors, to derive the composite score and rating.

Anticipated future views from sensitive viewpoints from which the proposed hotel would be visible are shown in Figure 12 and 13. These figures contain simulations of the planned bulk, height and color of the proposed hotel, located at the proposed site.

The simulations were prepared by first creating a scale, 3-dimensional solid model of the proposed hotel structure on a computer. A camera (Viewpoint) location and line of sight were determined from the photo and modeled using information from topographic and aerial maps. Finally, key objects in the photo were identified and used as 'Reference points' to overlay a digital rendering of the structure from that viewpoint, creating the visual simulation.

Analysis of whether the project would adversely affect a designated scenic vista, per Criterion A, involves integration of the degree of visual sensitivity and of anticipated visual change at each key viewpoint. This integration is shown in the following summary Tables 4 and 5, for the each of the two sensitive viewpoints from which the project would be visible (I-8, VP-C and Willows Road, VP-K).

Table 4 shows that the visual impact significance of the hotel project, when viewed from VP-C on I-8, would be the intersection of the moderate to moderately-high (3.24) value of visual sensitivity (at the left margin) with the moderately-low to moderate (2.58) value of the overall degree of visual change. The derivation of these values was previously shown in Table 2. The descriptor at the cell where the two values intersect is entitled "adverse [impact] but less than significant."

Table 5 shows that the visual impact significance of the hotel project, when viewed from VP-K on Willows Road, would be the intersection of the moderately-low to moderate (2.76) value of visual sensitivity (at the left margin) with the moderately-low to moderate (2.67) value of the overall degree of visual change. The derivation of these values for VP K was previously shown in Table 3. The descriptor where the two values intersect is entitled "adverse [impact] but less than significant."

**TABLE 2**  
**Analysis of Visual Sensitivity and Degree of Visual Change, I-8 VP-C**

Viewer Exposure Summary	From Table 1.	ML	2.2
<b>Overall Visual Sensitivity</b>	This factor is a <b>composite of the viewer exposure summary rating from above, plus the four factors listed immediately below; see summary below for the analysis results.</b>		
Visual quality of the setting	The setting is considered representative of the project region, and is not considered “exceptional”, which would rate an H rating or 5 score.	M-MH	3.5
Viewer type or sensitivity	Activities associated with highway vehicular views are considered passive. Many of the viewers would be commuters, passing that spot every day for months or years on end, while others would be long-haul truckers. A moderate proportion of the viewers may be tourists, seeing the view for the first time. As a result, the viewer sensitivity has been rated, on a composite basis, as “moderately low.”	ML	2
Number of viewers	According to Caltrans statistics for 2010, the average number of vehicles per day (AADT) was 25,500. This would result in 12,750 vehicles per day being eastbound, with a comparable number westbound. Caltrans 2009 truck statistics indicated approximately 3,000 trucks per day in that segment, or an average of 1,500 in each direction per day.	H	5
Viewer Visual Expectations	Vehicular viewers from I-8 westbound would have passed little in the way of development from the Imperial County line except for the highway itself, the Golden Acorn Casino, and the windmills nearby. While that environment is not pristine, relatively little of the environment is “man-modified” to that point, and highway viewer expectations would have become accommodated to that.	M-MH	3.5
<b>Overall Visual Sensitivity Summary</b>	This factor is a <b>composite of viewer exposure, plus the four factors listed above.</b> Based on the numeric scores listed above, the sum of the factors would be 16.2, with an average score of 3.24 (16.2 divided by 5). In qualitative terms, this would be characterized as “moderate +.”	<b>M-MH</b>	<b>3.24</b>
<b>Overall Degree of Visual Change</b>	This factor is a <b>composite of the three factors listed below; see summary below for the analysis results.</b>		
Visual contrast	Visual contrast of the proposed hotel structure is considered “moderate” due to its location immediately adjacent to the existing Casino and Outlet Center structures. While it would be taller than most of the other nearby structures, and more massive, in color it would be integrated with the existing structures, and with colors of Viejas Mountain nearby.	M-MH	3.5
Project dominance	The proposed hotel structure would be considered “dominant” if it were located alone, but only “moderately high” near the existing Casino and Hotel structures.	MH	4
View or vista blockage	None. The primary elements in the view of vehicular occupants would be the Viejas sign, Viejas Mountain, and Viejas Valley. The proposed hotel would not block these views.	N-L	0.25
<b>Overall Degree of Visual Change</b>	This factor is a composite of the 3 factors listed above. Based on the numeric scores listed above, the sum of the factors would be 7.75, with an average score of 2.58 (7.75 divided by 3). In qualitative terms, this would be described as between “ML to M” and “moderately-low to moderate.”	<b>ML-M</b>	<b>2.58</b>

Notes: Numerical Scores: None=0; Low = 1; ML = 2; Moderate = 3; MH = 4; High = 5  
Source: BRG Consulting, Inc., 2014

**TABLE 3**  
**Analysis of Visual Sensitivity/Degree of Visual Change,**  
**Willows Road VP-K**

Viewer Exposure Summary	From Table 1.	ML	2.8
<b>Overall Visual Sensitivity</b>	This factor is a <b>composite of the viewer exposure summary rating, plus the four factors listed immediately below; see summary below for the analysis results.</b>		
Visual quality of the setting	The setting is considered representative of the project region, and is not considered “exceptional” due to the surface parking lots, existing development, and power lines, which would reduce the rating.	M	3
Viewer type or sensitivity	Viewers would be traveling by automobile along Willows Road toward the Viejas Casino & Resort, and would most likely either be Reservation residents or visitors to the commercial development. Thus, the viewers would tend to be moderately sensitive.	M	3
Number of viewers	The number of viewers would be relatively “moderately-low” considering the travelers would most likely either be Reservation residents or visitors to the commercial development.	ML	2
Viewer Visual Expectations	Vehicular viewers from Willows Road westbound would have passed some residential units and other minor development from the I-8 off-ramp to the viewpoint.	M	3
<b>Overall Visual Sensitivity Summary</b>	This factor is a <b>composite of viewer exposure, plus the four factors listed above.</b> Based on the numeric scores listed above, the sum of the factors would be 13.8, with an average score of 2.76 (13.8 divided by 5). In qualitative terms, this would be characterized as “moderately-low.”	<b>ML-M</b>	<b>2.76</b>
<b>Overall Degree of Visual Change</b>	This factor is a <b>composite of the three factors listed below; see summary below for the analysis results.</b>		
Visual contrast	Visual contrast of the proposed hotel structure is considered “moderate” due to its location immediately adjacent to the existing Casino and Outlet Center structures. While it would be taller than most of the other nearby structures, and more massive, in color it would be integrated with the existing structures, and with colors of Viejas Mountain nearby.	M to MH	3.5
Project dominance	The proposed hotel structure would be considered “dominant” if it were viewed from a few hundred feet away, but would only be somewhat dominant element from approximately 1,000 feet away.	M to MH	3.5
View or vista blockage	None. The primary elements in view from Willows Road east of the Reservation are mature trees. The hotel would thus be primarily obstructed by landscape elements in front of it and silhouetted against Viejas Mountain. The proposed hotel would not block views of Viejas Mountain, Viejas Valley, or other natural scenic landscapes.	L	1
<b>Overall Degree of Visual Change</b>	This factor is a composite of the three factors listed above. Based on the numeric scores listed above, the sum of the factors would be 8, with an average score of 2.67 (8 divided by 3). In qualitative terms, this would be described as between “moderate” and “moderately-high.”	<b>ML-M</b>	<b>2.67</b>

Source: BRG Consulting, Inc., 2014

## 5.5 Determination of Significance

Regarding visual impact significance Criterion A, there are no designated scenic vistas identified that would be impacted by the Proposed Project. In regards to Criterion B, there is no designated state scenic highway present. The proposed hotel would add an additional tower on the eastern side of the Viejas Casino, but would have no impact on any scenic resources such as trees, rock outcroppings or historic buildings. None of those resources are located at the proposed project site. Thus, there would be no project visual impact relative to Criterion B. Regarding Criterion C and potential “glare”, the new hotel south tower would have limited amounts of glass for windows. It would not be a “glass box,” but would be similar to existing hotel. Hotel windows would be vertical in orientation, and located below the elevation of potential viewers at the key viewpoints VP-C or VP-K, and thus, any

sun-related glare from either the rising or setting sun would reflect at an angle below viewers at those viewpoints. Regarding project lighting that may be visible after dark, it is anticipated that the southern face of the hotel would be illuminated using downward-facing lighting from above similar to the lighting of the existing building to be removed. As with other prior Viejas projects, the hotel lighting would comply with the County's Light Pollution Code, Sec. 59.101, County of San Diego Zoning Ordinance Section 6320, 6322 and 6324, and Title 24 of the California Code of Regulations. The project site is located approximately 17 miles from Mt. Laguna Observatory, and so is categorized as within "Zone B" of the light pollution code. This code allows for illumination of the hotel building by low-pressure sodium lighting, other lighting of 4050 lumens and below, and/or luminous tube lighting. Per the Code, the Class III (decorative lighting) would need to be turned off between 11:00 p.m. and sunrise (Sec. 59.108 D). Hotel lighting at the Reservation would continue to comply with the Light Pollution Code provisions. Thus, there would be no significant project visual impact relative to Criterion C.

**Therefore, based on the foregoing analysis, the proposed hotel project would not have a substantial adverse effect on a scenic vista, damage off-Reservation scenic resources, or provide a substantial source of light or glare.**

## 5.6 Cumulative Impact Analysis

The list of cumulative projects provided to LLG Engineers by San Diego County personnel and listed in Table 8-1 of the Traffic Report, TEIR Appendix B, are all located within the community of Alpine. None of the projects would be visible from within the hotel project viewshed, so there would be no cumulative visual impacts associated with the hotel project and with any of the cumulative projects listed in Table 8-1. It is possible that in the future additional commercial developments will be identified and pursued within Viejas Reservation. Also, additional commercial developments may be implemented in the private lands located between the Reservation and the East Willows Interchange to I-8 (FCI General Plan Amendment pending at the County). However, at this time there are no definitive plans or timetable for such developments, and there are potentially substantive barriers to them, such as questions about water availability and wastewater treatment facilities. Therefore, these potential developments have been treated as "speculative" at this time, and are not addressed in this cumulative impact analysis.

## 5.7 Summary of Project Impacts, Significance and Conclusions

Based on the foregoing analysis, development of the proposed hotel south tower would result in adverse but less than significant visual impacts.

# 6.0 VISUAL MITIGATION AND DESIGN CONSIDERATIONS

Since less than significant visual impacts of the proposed hotel have been identified, no visual impact mitigation is required.

**TABLE 4**  
**Determination of Visual Impact Significance**  
**Proposed Viejas Hotel South Tower, Viewed from Interstate-8**

2.58 (from Table 2)

OVERALL VISUAL SENSITIVITY	OVERALL DEGREE OF VISUAL CHANGE				
	Low	Low to Moderate	Moderate	Moderate to High	High
LOW	Not significant	Not significant	Adverse but less than significant	Adverse but less than significant	Adverse but less than significant
LOW TO MODERATE	Not Significant	Adverse but less than significant	Adverse but less than significant	Adverse but less than significant	Adverse but less than significant
MODERATE	Adverse but less than significant	Adverse but less than significant ☆	Adverse but less than significant	Adverse and potentially significant	Adverse and potentially significant
MODERATE TO HIGH	Adverse but less than significant	Adverse but less than significant	Adverse and potentially significant	Adverse and potentially significant	Significant
HIGH	Adverse but less than significant	Adverse and potentially significant	Adverse and potentially significant	Significant	Significant

3.24 (from Table 2)

Source: BRG Consulting, Inc., March 2014. Miguel-Mission 230 kV #2 Project Draft EIR, CPUC, April 2004.

Notes: Not Significant – Impacts may or may not be perceptible but are considered minor in the context of existing landscape characteristics and view opportunity.

Adverse but less than significant – Impacts are perceived as negative but do not exceed environmental thresholds.

Adverse and potentially significant – Impacts are perceived as negative and may exceed environmental thresholds depending on project- and site-specific circumstances. Mitigation could reduce impacts to less than significant levels.

Significant – Impacts with feasible mitigation may be reduced to less than significant levels or avoided altogether. Without mitigation or avoidance measures, significant impacts would exceed environmental thresholds.

**TABLE 5**  
**Determination of Visual Impact Significance**  
**Proposed Viejas Hotel South Tower, Viewed from Willows Road**

2.67 (from Table 3)

OVERALL VISUAL SENSITIVITY	OVERALL DEGREE OF VISUAL CHANGE				
	Low	Low to Moderate	Moderate	Moderate to High	High
LOW	Not significant	Not significant	Adverse but less than significant	Adverse but less than significant	Adverse but less than significant
LOW TO MODERATE	Not Significant	Adverse but less than significant	Adverse but less than significant	Adverse but less than significant	Adverse but less than significant
MODERATE	Adverse but less than significant	Adverse but less than significant	Adverse but less than significant	Adverse and potentially significant	Adverse and potentially significant
MODERATE TO HIGH	Adverse but less than significant	Adverse but less than significant	Adverse and potentially significant	Adverse and potentially significant	Significant
HIGH	Adverse but less than significant	Adverse and potentially significant	Adverse and potentially significant	Significant	Significant

2.76 (from Table3)

Source: BRG Consulting, Inc., March 2014. Miguel-Mission 230 kV #2 Project Draft EIR, CPUC, April 2004.  
 Notes: Not Significant – Impacts may or may not be perceptible but are considered minor in the context of existing landscape characteristics and view opportunity.  
 Adverse but less than significant – Impacts are perceived as negative but do not exceed environmental thresholds.  
 Adverse and potentially significant – Impacts are perceived as negative and may exceed environmental thresholds depending on project- and site-specific circumstances. Mitigation could reduce impacts to less than significant levels.  
 Significant – Impacts with feasible mitigation may be reduced to less than significant levels or avoided altogether. Without mitigation or avoidance measures, significant impacts would exceed environmental thresholds.



## 7.0 REFERENCES

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## 8.0 QUALIFICATIONS OF REPORT PREPARER

### **Audrey Young, BRG Consulting, Inc., Assistant Project Manager**

Ms. Young has 4 years environmental planning experience, including preparation of several visual impact reports, environmental assessments, and environmental impact reports. Most of these contained analyses of potential project visual impacts, which Ms. Young reviewed for technical rigor and for compliance to applicable environmental guidance.

### **Edward Arcadia, BRG Consulting, Inc., CADD/Visual Simulations**

Edward Arcadia prepared visual simulations for this analysis. Mr. Arcadia has a Bachelor's degree in Political Science/Urban Planning from the University of California at San Diego and 10 years experience the preparation of Visual Simulations using Computer Aided Design platforms. He has previously prepared Visual Simulations for the Ardath Road Realignment, Lone Peak, and Los Coches projects, and recently, the photosimulations for the Imperial County West and South Solar Energy Centers in El Centro, Pacific Surfliner Sorrento to Miramar Phase 2 Double-Track Project, Pacific Surfliner Carlsbad Village Double-Track Project, Viejas Hotel, and Viejas Parking Structure.

### **Erich Lathers, BRG Consulting, Inc., President, QA/QC**

Mr. Lathers has almost 30 years of professional experience implementing all aspects of the California Environmental Quality Act and National Environmental Policy Act. He has been responsible for preparation of two prior TEIRs for Casino-related development at the Viejas Indian Reservation. He was responsible for overall technical guidance and quality assurance during preparation of this report.