GR-8 Visual Impacts

This Global Response addresses the following visual-impact-related topics:

- Project visual impacts
- Cumulative visual impacts
- Key viewpoints
- Shadow flicker

A number of commenters state that implementation of the Campo Wind Project with Boulder Brush Facilities (Project) and other cumulative projects would result in visual impacts to the natural landscape and detract from the character of the area. Although many of the visual-related comments received do not raise an issue regarding the adequacy of the analysis provided within the Draft Environmental Impact Report (EIR), a Global Response for visual-impact-related comments is provided in order to address concerns regarding aesthetic impacts associated with changes in scenic views and visual simulations and key observation points used in the visual analysis for the Project.

Project Visual Impacts

The visual impacts of the Project have been analyzed in the Draft EIR (Chapter 2.1, Aesthetics) and the Visual Resources Report prepared for the Project (Appendix B of the Draft EIR). Both the aesthetics chapter of the Draft EIR and the Visual Resources Report were prepared in accordance with County of San Diego (County) Guidelines for Determining Significance and the County Report Format and Content Requirements for Visual Resources. Chapter 2.1 of the Draft EIR analyzes impacts to the visual character and community character of the area around the Project. As discussed in Chapter 2.1, it has been determined that implementation of the Project would result in significant and unavoidable aesthetic impacts pertaining to changes in visual character and/or quality, community character, scenic vistas, light and glare, and cumulative impacts as a result of the proposed wind turbines, even with the inclusion of mitigation measures **M-AE-A** through **M-AE-H** (please refer to Chapter 2.1, Section 2.1.6 of the Draft EIR).

As disclosed in the Visual Resources Report, the County subregional and community plans are not applicable to the Campo Wind Facilities and the Campo Band of Diegueño Mission Indians Reservation (Reservation), as the County has no land use jurisdiction over tribal lands. See Section 5.3.2.4, Threshold 4, of the Visual Resources Report (Appendix B of the Draft EIR). The Reservation is also not subject to County zoning requirements; therefore, the Campo Wind Facilities were not assessed against County policies and regulations. However, in terms of visual character, views, and light pollution, the Draft EIR concluded that impacts associated with development and operation of the Campo Wind Facilities would be significant and unavoidable.

These impacts would occur specifically in the context of Threshold 1 (i.e., detract from or contrast with existing visual character) and with consideration to the height of Project wind turbines, which would be up to approximately 586 feet. Mitigation measures **M-AE-A** through **M-AE-H** are recommended mitigation measures in the Final Environmental Impact Statement prepared for the Campo Wind Project with Boulder Brush Facilities Project by the Bureau of Indian Affairs, as required in the Bureau of Indian Affairs' Record of Decision. They are also included in the Draft EIR and would reduce impacts associated with visual resources to the extent feasible.

Due to the lower profile and more limited nature of the Boulder Brush Facilities within the County's jurisdiction, visual impacts as a result of the Boulder Brush Facilities would be less than significant with one exception. Impacts to community character and scenic vistas resulting from the Boulder Brush Facilities were determined to be significant and unavoidable because the Off-Reservation gen-tie line would impact notable landscape features that contribute to the valued visual character of the Boulevard area (e.g., openness), and the Off-Reservation gen-tie line would result in impacts to existing views across the Boulder Brush Boundary from Ribbonwood Road. No feasible mitigation was identified for impacts to visual character and focal or panoramic vistas associated with the silhouetted segments of the Off-Reservation gen-tie line.

Cumulative Visual Impacts

Regarding comments specific to cumulative visual impacts due to previously approved wind energy projects, solar energy projects, and transmission lines, Section 5.4 of the Visual Resources Report (Appendix B to the Draft EIR), and Chapter 2.1 (Section 2.1.4) of the Draft EIR analyze cumulative visual impacts. As described in Appendix B, Section 5.4.1, Methodology, the Interstate (I) 8 viewshed serves as the physical boundary for determining cumulative visual effects for the purpose of the Visual Resources Report analysis. It was determined that this viewshed encompasses the Project viewshed and the more distant landscape of the Jacumba Valley. This composite viewshed was determined to be an appropriate cumulative boundary based on the geographic extent of the Project's visual impacts and the presence of similar projects in the Project vicinity.

In addition, the composite viewshed encompasses projects that would result in impacts of similar severity as the Project, and that have the potential to contribute to changing visual character along the I-8 corridor and other local roads traversing the Boulevard and Jacumba areas. For the Draft EIR, 10 projects have been identified within the cumulative study area; these consist of wind and solar energy generation developments, substation and battery storage facilities, and transmission line projects. These cumulative projects include Tule Wind project (completed), Tule II Wind project (approved), East County Substation (completed), Jacumba Solar (completed), Torrey Wind project (under review), JVR Energy Park project (under review), original application for Rugged Solar project (approved) and revised application for Rugged Solar project (under review), Energia Sierra Juarez Wind project I (completed), Energia Sierra Juarez U.S. Transmission Major Use

Permit (completed), Boulevard Solar (under review), and Boulevard Energy Storage (under review). The Visual Resources Report analysis determined that the number of completed and proposed wind and solar energy generation developments, electrical substations, and electrical transmission lines in the Boulevard and Jacumba areas, and specifically within the I-8 viewshed, would entail viewshed-scale visual change. Further, the introduction of numerous prominent structures and facilities would moderately to strongly contrast with the rural visual character of the local communities in the cumulative study area.

Implementation of design features and recommended mitigation measures for the Project, as identified in the Draft EIR and as recommended in the Final Environmental Impact Statement, would reduce anticipated visual contrast and viewshed impacts to the extent feasible; however, due to the scale and prominence of the Project wind turbines On-Reservation, prominent contrasting components (i.e., wind turbines) cannot be more successfully integrated into the landscape. The Project, in combination with the cumulative projects described above, would result in significant direct and unavoidable cumulative visual impacts.

Key Viewpoints

County guidelines require the consideration of a number of key viewpoints that would most clearly display the visual effects of the Project. As described in the Visual Resources Report, 12 key observation points were selected from which to evaluate changes to existing views, visual character, and visual quality resulting from implementation of the Project; nine were selected for the Campo Wind Facilities and three were selected for the Boulder Brush Facilities. The intent of key observation points (or key views) and visual simulations included as part of the Visual Resources Report and Chapter 2.1 of the Draft EIR is to approximate the visual change associated with a development proposal through the use of best available information and as experienced from representative public vantage points in the surrounding area. Neither CEQA nor County Guidelines for Determining Significance and Report Format and Content Requirements—Visual Resources specifically require visual analysis for private views. Additionally, private vantage points are rarely selected as County guidelines require the selection of key observation points that "adequately represent a real view as the public would see it from a *publicly accessible location"* (County of San Diego 2007). Further, selection of private locations as key observation points would not be representative of views and visual changes experienced from public vantage points. The selected key view observation points are representative of the available views in the surrounding area and views from private properties by owners can be inferred through the rigorous analysis and visual simulations provided in the Visual Resources Report. Lastly, the selection of key viewpoints during preparation of the Visual Resources Report is consistent with applicable guidelines for photosimulations as established in the County's Report Format and Content Requirements – Visual Resources.

While private vantage points were not selected as key observation points, the Visual Resources Report analyzes the entirety of the Project and considers the various viewer groups in the Project area when determining the severity of visual change and visual impacts. Further, the Visual Resources Report analyzes the Project in accordance with established County thresholds for visual resources that consider contrasts with the existing visual character/quality of a community or localized area generally, not from individual vantage points. As stated in Section 5.1.3, Key Observation Points, in the Visual Resources Report (Appendix B to the Draft EIR), analyzing all the views in which the Project would be seen is not feasible.

Shadow Flicker

Some comments expressed concerns regarding shadow flicker as a result of the Project wind turbines. As described in Chapter 2.1 of the Draft EIR, while there are no federal, state, or local regulations applicable to shadow flicker, a Shadow Flicker Analysis was conducted by AWS Truepower LLC to analyze potential shadow flicker effects from Project wind turbines. The Shadow Flicker Analysis is included as Appendix O of the Draft EIR. A Supplemental Shadow Flicker Analysis was completed subsequent to public review of the Draft EIR and is included in the Final EIR as Attachment 1 to Appendix O.

Based on the shadow flicker analyses, it was determined that some On and Off-Reservation receptors may experience shadow flicker. As discussed and presented in Chapter 2.1 of the Draft EIR, Project Design Feature **(PDFs)** would be implemented for the Campo Wind Facilities. Specifically, **PDF-AE-1** and **PDF-AE-2** would reduce potential shadow flicker experienced at On- and Off-Reservation receptors. Please refer to Chapter 2.1 and Chapter 2.5, Hazards and Hazardous Materials, of the Draft EIR for a detailed analysis on shadow flicker. Also please refer to the discussion of Shadow Flicker in Global Response GR-2.

Summary

Impacts to visual resources are accurately and sufficiently analyzed in the Draft EIR and supporting Visual Resources Report (Appendix B) and Shadow Flicker Analysis (Appendix O). Comments regarding visual impacts did not raise new information not previously addressed in the Draft EIR. Per Response to Comment I37-9, a minor revision will be made in Chapter 2.1 of the Final EIR and Section 5.3.2.1 of the Visual Resources Report to clarify that the proposed widening of Ribbonwood Road north of Opalocka Road would occur within the existing County right-of-way and/or non-exclusive easements. Otherwise, no further modifications to the Draft EIR aesthetics analysis or Visual Resources Report is warranted.