

November 18th, 2013

Ms. Ashley Gungle
County of San Diego
Dept. of Planning and Development Services
5510 Overland Avenue, 3rd Floor Suite 310
San Diego, California 92123

Subject: Ocotillo Wells Solar Farm Project - Additional Viewpoint Analysis in Response to Comments Received from Mr. Tom Harrington; P3300-12-004; ER No. 3910-12-12-001

Dear Ms. Gungle:

The following discussion has been prepared in response to comments received by County of San Diego staff from Mr. Tom Harrington (see Attachment A of this letter), a part-time resident of the Ocotillo Wells community who maintains a residence off of Split Mountain Road, just northwest of the proposed Ocotillo Wells Solar Project site. Mr. Harrington's comments were received subsequent to the close of the 30-day public review response period required under the California Environmental Quality Act (CEQA); however, the Project applicant has prepared written responses to the comments provided by Mr. Harrington to ensure that all public comments received on the proposed Gildred Ocotillo Wells Solar Project have been addressed, and in particular, those relative to the Project's potential to affect or change the existing visual character of the Ocotillo Wells area and/or the surrounding visual landscape (e.g. Anza Borrego Desert State Park).

The analysis performed in response to comments received from Mr. Harrington did not result in identification of any new or adverse Project impacts on visual resources within the Ocotillo Wells area. Each of the additional viewpoints were evaluated, and it was determined that the proposed Project would not significantly alter or substantially degrade existing views of the visual landscape from these locations. Impacts would be less than significant, and no mitigation measures are required.

Visual Resources Analysis

The following viewpoint locations within the area surrounding the Project site were identified in Mr. Harrington's comment letter. A description of each location and an analysis of the potential for existing views from each vantage point are provided below. Figure 1, Viewpoint Location Map, identifies the location, elevation, and distance to the Project site for each of the vantage points considered.

1) Elephant Trees Discovery Trail, Anza Borrego Desert State Park

The turnoff for the Elephant Trees Discovery Trail is located approximately 5.9 miles south of SR 78 along Split Mountain Road. From Split Mountain Road, a dirt road extends generally west/southwest to the parking lot where the trailhead is located; refer to Figure 1.

The main Elephant Trees Discovery Trail leads from the parking area and trends along a dry rocky alluvial wash. The trail is marked by numbered posts identifying various plants and geologic features along the way. The trail is an approximately 1.5-mile loop trail which leads to a lone elephant tree approximately halfway along the trail.¹ Although many elephant trees were once present within the vicinity of this portion of the trail, only the one elephant tree remains at the present time.² The 1.5-mile loop trail tends to be a popular trail and experiences greater foot traffic, due to its length and limited elevation change.

Stormwater flows within the wash have historically created banks of varying height along the alluvial bed. Established vegetation in various forms of scrub brush and grasses is also present along the extent.



Photo 1A: View looking northeast to the Project site from trailhead at the parking lot of Elephant Tree Discovery Trail, located approximately two miles to the center of the Project site.

¹ Anza Borrego Desert State Park – Historic Trails Edition. URL Online: <http://www.parks.ca.gov/pages/638/files/anza-borrego%20desert%20state%20park%20magazine.pdf>. Accessed November 11, 2013.

² Anza Borrego Desert State Park – Historic Trails Edition. URL Online: <http://www.parks.ca.gov/pages/638/files/anza-borrego%20desert%20state%20park%20magazine.pdf>. Accessed November 11, 2013.



Photo 1B: View looking northeast to the Project site from Elephant Trees Discovery Trail. The Project site is located at a distance of approximately 2.3 miles to the northeast of this viewpoint location; refer also to Figure 1, Viewpoint Location Map.



Photo 1C: View looking northeast to the Project site from near the lone remaining elephant tree located along the 1.5-mile Elephant Trees Discovery Trail.

View Analysis:

From the trailhead at the parking lot, the Project site is located approximately two miles away; distance to the Project site at the greatest extent along the 1.5-mile loop trail is an estimated 2.5 miles. Views considered for this analysis include 1A, Elephant Tree Parking Area (Trailhead); 1B, Elephant Tree Discovery Trail; and 1C, Elephant Tree Discovery Trail (Elephant Tree Location). These locations are shown on Figure 1, Viewpoint Location Map.

Views of the Project site would be experienced by travelers from varying vantage points along the Elephant Trees Discovery Trail, as well as from the trailhead located at the parking lot. Views of the Anza Borrego Desert State Park from the trail are generally restricted to that looking to the east/northeast, due to intervening geographical elements and vegetation along the trail that obscure and/or limit the extent of views. From the trailhead, one moves southwest/westward for approximately $\frac{1}{2}$ of the length of the trail. Therefore, one's back is to the Project site for a portion of the trail, requiring one to physically and consciously turn around 180 degrees to experience views of the site. For the second half of the loop trail, the viewer would generally be facing northeast/east, and views of the Project site may be afforded. Although higher elevations along the trail would afford greater visibility of the Project site, such views would occur at a distance of two or more miles, and would be further reduced by intervening vegetation.

The maximum height of the Project elements would be 30 feet (depending on the type of solar technology selected) as measured from the ground surface. Therefore, the Project components would appear similar in height to a single-family residence and would not represent elements of significant height or scale within the visual landscape. As shown in Photos 1B and 1C, views of the Project components may occur from limited vantage points along the trail; however, due to the limited height of the panels, such elements would appear similar to that of other existing structural elements (e.g. residential units) within the visual landscape. Therefore, as shown in Photos 1B and 1C and described herein, due to distance, viewing angle, and intervening vegetation, the proposed Project would not significantly alter or substantially degrade existing views of the visual landscape from the Elephant Trees Discovery Trail. Impacts on this viewpoint as the result of Project implementation are considered to be less than significant.

2) Font's Point, Anza Borrego Desert State Park

Traveling approximately 10 miles east along S22 from Borrego Springs, Font's Point is accessed via a dry dirt wash (graded surface) extending approximately four miles southeastward from S22 to a loop which forms the main viewing plateau. Font's Point rises above the valley floor with elevations on the edges of the plateau ranging from approximately 1,270 feet to 1,290 feet amsl, depending on where one stands on the lookout; refer to Photo 3, below.³ The viewpoint location considered for this analysis is shown as 2) Font's Point on Figure 1, Viewpoint Location Map.

Scenic views of a variety of geological points of interest located within the Borrego Valley below are afforded from the extent of Font's Point. The plateau affords a 360-degree panorama of the northern half of the Anza Borrego Desert. To the south near the distant horizon are the Fish Creek, Vallecito and Pinyon Mountains, near the Carrizo Corridor; in the middleground are the twin buttes of Borrego Mountain; and, in the foreground, the San Felipe Wash, Sleepy Hollow, and Borrego Sink comprise the viewing plane.⁴ Views to the south/southeast are of the Anza-Borrego Desert State Park encompassing the Borrego Badlands, comprised of rocky, sunken mesas and corrugated hills of formed mud, all remnants of the Colorado River delta and floodplains; west to Borrego Springs and the San Ysidro Mountains; and, south/southeast to Ocotillo Wells, the Salton Sea, and Baja California.⁵

³ Lat-Long.com. http://www.lat-long.com/Latitude-Longitude-242341-California-Fonts_Point.html. Accessed November 11, 2013.

⁴ Desert USA. http://www.desertusa.com/anza_borrego/du-abpbobad.html. Accessed November 11, 2013.

⁵ Ibid.

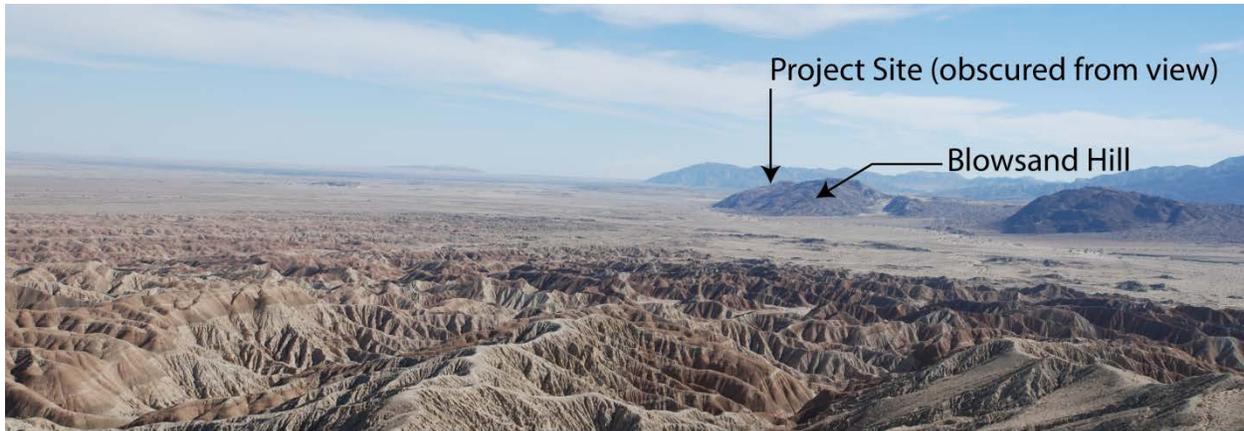


Photo 2: View looking southeast to the Project site from Font's Point. The Project site is located at a distance of approximately fifteen miles to the southeast of this viewpoint location.

View Analysis:

Views from this viewing plateau would occur from a distance of approximately fifteen miles from the Project site. As shown in Photo 2, above, and Figure 1, Viewpoint Location Map, the Project site would be obscured from view from this vantage point by Blowsand Hill (see discussion of Viewpoint Location "7," below). Views of the Project would therefore not be experienced by any viewers occupying Font's Point.

As no views of the site would occur, implementation of the Project would not introduce a new visual element that would substantially degrade the existing visual landscape or have a substantial adverse effect on this scenic vista. Therefore, impacts on this viewpoint as the result of Project implementation would be less than significant.

3) Fish Creek Trail, Anza Borrego Desert State Park

The Fish Creek Trailhead is located approximately eight miles south of SR 78 and just west of Split Mountain Road. From the trailhead, the trail follows the sandy Fish Creek dry wash, extending past the Fish Creek Primitive Camp Area, into Fish Creek Canyon, then passing through Split Mountain. Other features along the trail include the Wind Caves hiking trails, southward to the Diablo Drop-Off, then westward to the Sandstone Canyon Trail with connection to a series of other trails. The viewpoint location considered for this analysis is shown as 3) Fish Creek Trail on Figure 1, Viewpoint Location Map.



Photo 3: View looking north/northeast to the Project site from Fish Creek Trail. The Project site is located at a distance of approximately 4.3 miles to the north/northeast of this viewpoint location.

View Analysis:

Although distance to the Project site increases as one travels along the trail, the viewpoint location considered for this analysis is located approximately 4.3 miles from the site. The trail follows along a dry wash, with limited variation in elevation. Although limited glimpses of the Project site may be visible from near Split Mountain Road, the Project site quickly becomes obscured from view, due to intervening geological features in the landscape and similar elevation as the Project site along the flatter portions of the valley floor, as shown in Photo 3, above. Further, any such views of the Project components from near Split Mountain Road would be highly limited, due to the height of the proposed structural elements and distance from the Project site. Even as one travels further to the south/southwest along the trail, past Split Mountain, views of the Project site continue to be fully obscured due to the geological features within the landscape.

As views of the site would not occur from this viewpoint, implementation of the Project would not introduce a new visual element that would substantially degrade the existing visual landscape or have a substantial adverse effect on existing views along the length of the trail. Therefore, impacts on this viewpoint as the result of Project implementation would be less than significant.

4) Fish Creek Primitive Campground, Anza Borrego Desert State Park

The Fish Creek Primitive Campground is located approximately 1.4 miles southwest/west of Split Mountain Road, along the Fish Creek Trail described in viewpoint 3, above, just before one enters the Split Mountain Gorge. Elevation of the campground where the viewpoint considered is located is approximately 309 feet amsl. No campsite amenities are present, with exception of fire rings and toilets. The viewpoint location considered for this analysis is shown as 4) Fish Creek primitive Campground on Figure 1, Viewpoint Location Map.



Photo 4: View looking north/northeast to the Project site from the primitive campgrounds along the Fish Creek wash. The Project site is located at a distance of approximately 4.2 miles to the north/northeast of this viewpoint location.

View Analysis:

Similar to that described above for viewpoint location 3), Fish Creek Trail, views of the Project site from the Fish Creek Primitive Campground would be obscured from this location due to existing geological elements, similar elevation as the site, and the viewing angle, as shown in Photo 4, above. As this viewpoint is distanced approximately 4.2 miles from the Project site, combined with the height of the proposed structural elements, any potential views of the Project would be further reduced.

As views of the site would not occur from this viewpoint, implementation of the Project would not introduce a new visual element that would substantially degrade the existing visual landscape or have a substantial adverse effect on existing views. Therefore, impacts on this viewpoint as the result of Project implementation would be less than significant.

5) Arroyo Salado Primitive Campground, Anza Borrego Desert State Park

The Arroyo Salado Campground is located just south of S22, near the northeastern entrance to Anza Borrego Desert State Park. The primitive campground is accessed by a dirt road extending south of S22, and offers several rustic campsites, pit toilets, and no fire pits. A large hill trends along the southern edge of the campground area, obscuring any views of the valley below; however, if one climbs the hill, views of the valley are afforded. The viewpoint location considered for this analysis is shown as 5) Arroyo Salado Primitive Campground on Figure 1, Viewpoint Location Map.



Photo 5: View looking south/southeast to the Project site from the primitive Arroyo Salado Primitive Campground. The Project site is located at a distance of approximately 14 miles to the south/southeast of this viewpoint location.

View Analysis:

This viewpoint location is approximately 14 miles from the Project site, and occurs at an elevation of approximately 830 amsl. As stated above, a large hill trends along the southern edge of the campground area, obscuring any views of the valley below. Therefore, the Project site is not visible from the campgrounds, and no such views would be experienced by anyone utilizing this area for recreational purposes; however, if one climbs the hill, expansive views of the valley are witnessed.

Even so, views of the Project site from this viewpoint (see Photo 5, above) would be obscured by topography (sand and mud hills) which rises from the valley floor and occupies the middleground between this vantage point and the Project site. Therefore, even if one were to climb the hill to experience views of the valley floor, the Project site would not be visible.

As views of the site would not occur from this viewpoint, implementation of the Project would not introduce a new visual element that would substantially degrade the existing visual landscape or have a substantial adverse effect on an existing scenic vista. Therefore, impacts on this viewpoint as the result of Project implementation would be less than significant.

6) Superstition Mountain OHV Open Area, Anza Borrego Desert State Park

The Superstition Mountain Offroad Highway Vehicle (OHV) Open Area is located approximately 19 miles to the southeast of the Project site, off of Wheeler Road. Main access to the mountain is generally provided from Huff Road to Wheeler Road, then traveling northwest along Wheeler Road near the base of the mountain. The Superstition Mountain OHV Open Area generally trends northwest to southeast and offers primitive camping area along the southern side of its base. Elevations in this area vary, based upon a viewer's location either along the base of the mountain, in the vicinity of the primitive campgrounds, to locations near the top of the slope (which would likely only be experienced by those operating or passengers on off-road vehicles, and not the general public). The viewpoint location considered for this analysis is shown as 6) Superstition Mountain OHV Open Area on Figure 1, Viewpoint Location Map.



Photo 6: View looking northwest to the Project site from base of Superstition Mountain, near the campgrounds. The Project site is located at a distance of approximately 19 miles to the northwest of this viewpoint location.

View Analysis:

This location is approximately 19 miles from the Project site. Views of the Project site by those utilizing off-road vehicles (e.g. motorcycles, quads, sand cars) on the mountain may occur intermittently; however, most viewers would be operating a moving vehicle, and therefore, the extent and length of any such views would be greatly limited and intermittent if experienced. If riders along the hill stopped and actively looked to the site, views of the Project elements may be afforded; however, due to the 19-mile distance and the limited height of the proposed structural elements (30 feet maximum), visibility of the Project components would be greatly reduced and would be similar to other structural elements within the visual landscape (e.g. residences, commercial uses, Ocotillo Airport, etc.). A maintenance road does provide limited access to the top of the hill; however, the road is not intended for public use, and therefore, public views from this road would not occur.

As stated above, the viewpoint location considered for this analysis is shown as 6) Superstition Mountain OHV Open Area on Figure 1, Viewpoint Location Map. A location within the campground area near the base of the mountain was selected for analysis, as this is where the majority of public views would most likely occur. From along the base of the mountain, looking northwest to the Project site, the site would not be visible, due to a small bluff which rises in the middleground; refer to Photo 6, above. Therefore, views from this viewpoint (and other similar locations within the campgrounds along the base of the mountain) would not afford views of the Project. As one travels to the northwest within the OHV Open Area, limited views of the Project site may occur from certain vantage points; however, due to similar elevations as the Project site, combined with the extensive distance from the site, views of the Project elements would be greatly minimized. Further, due to the height of the proposed solar panels (maximum of 30 feet), the Project components would blend into the visual landscape when considered with other structural elements within the visual context, thereby reducing any views experienced from the OHV Open Area.

As views of the site would not occur from this viewpoint, implementation of the Project would not introduce a new visual element that would substantially degrade the existing visual landscape or have a substantial adverse effect on an existing scenic vista. Therefore, impacts on this viewpoint as the result of Project implementation would be less than significant.

7) Blowsand Hill, Anza Borrego Desert State Park

Blowsand Hill is located just to the north of SR 78, within the Ocotillo Wells State Vehicle Recreational Area (SVRA). This recreational site is generally considered to be one of the most highly-utilized destinations within the SVRA and offers a large sand hill for use by off-road recreational vehicles. Blowsand Hill consists of a steep incline of sand “blown up” the side of Butte Mountain, affording views of the desert floor below. Primitive camping is available along the lower, flatter elevations near the base of the hill. The viewpoint location considered for this analysis is shown as 7) Blowsand Hill on Figure 1, Viewpoint Location Map.



Photo 7: View looking southeast to the Project site from the base of Blowsand Hill, near the camping grounds. The Project site is located at a distance of approximately seven miles to the southeast of this viewpoint location.

View Analysis:

This viewpoint location is approximately 6.7 miles from the Project site, and at an elevation of approximately 311 amsl. Views of the Project site would be afforded along the southern side of Blowsand Hill, looking south/southeast to the site across the valley. Although views of the site would be afforded from the higher elevations, such views would occur at a distance of approximately seven miles, thereby reducing the visibility of the Project elements within the landscape. Other structural elements (e.g. residential and commercial uses, Ocotillo Airport, SR 78, RV parks, roadways, etc.) would also be visible within the visual context. The maximum height of the Project elements would be 30 feet (depending on the type of solar technology selected) as measured from the ground surface. Therefore, the Project components would appear similar in height to a single-family residence and would not represent elements of significant height or scale within the visual landscape. Views of the Project components may occur from vantage points along the hillside; however, due to the limited height of the panels, such elements would appear similar to that of other existing structural elements within the visual landscape. Further, any such views of the Project site would be experienced by those operating or riding on off-road vehicles who would be required to actively look to the Project site to experience such views or to stop the vehicle on the hillside and look out over the valley below.

Along the lower, flatter portions of this area where the public campgrounds are located, views of the site would be obscured due to similar elevation relative to the Project site. Intervening development, vegetation, and topographical features within the landscape would further

contribute to the blockage of views to the Project site from the lower elevations at this location.

Therefore, as shown in Photo 7 and described herein, due to the 6.7-mile distance, viewing angle, and intervening vegetation, the proposed Project would not significantly alter or substantially degrade existing views of the visual landscape from Blowsand Hill. Impacts on this viewpoint as the result of Project implementation are considered to be less than significant.

In summary, and as previously stated above, the analysis performed in response to comments received from Mr. Harrington did not result in identification of any new or adverse Project impacts on the visual resources considered within the Ocotillo Wells area. The additional viewpoints were evaluated, and it was determined that the proposed Project would not significantly alter or substantially degrade existing views of the visual landscape from these locations. Impacts would be less than significant, and no mitigation measures are required.

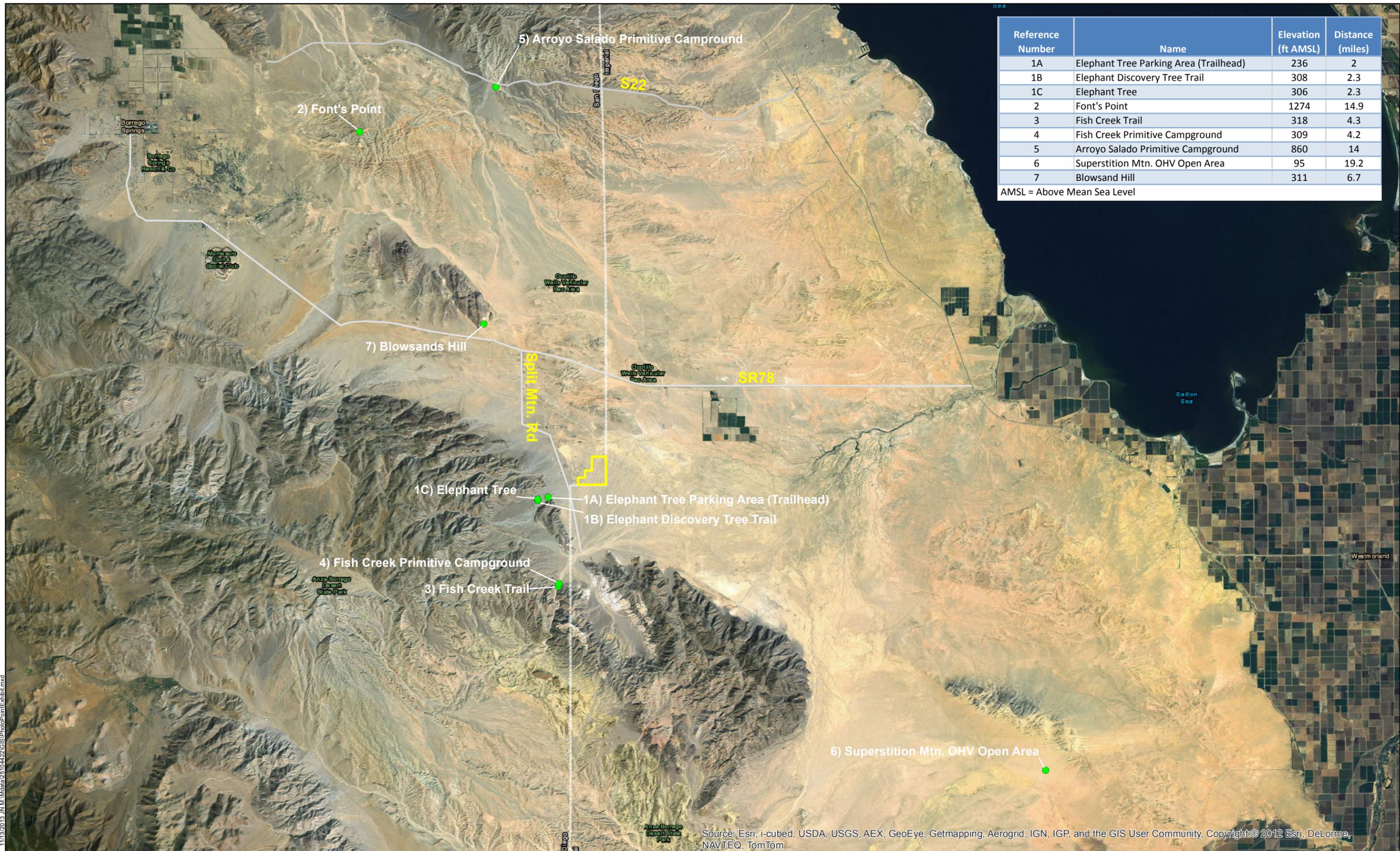
Please do not hesitate to contact me with any questions regarding these responses to comments or if you require additional information. We look forward to hearing from you.

Sincerely,



Steve Wragg
Vice President

Cc: Jim Whalen, J. Whalen Associates
Ryan R. Waterman, Stoel Rives LLP



Reference Number	Name	Elevation (ft AMSL)	Distance (miles)
1A	Elephant Tree Parking Area (Trailhead)	236	2
1B	Elephant Discovery Tree Trail	308	2.3
1C	Elephant Tree	306	2.3
2	Font's Point	1274	14.9
3	Fish Creek Trail	318	4.3
4	Fish Creek Primitive Campground	309	4.2
5	Arroyo Salado Primitive Campground	860	14
6	Superstition Mtn. OHV Open Area	95	19.2
7	Blowsand Hill	311	6.7

AMSL = Above Mean Sea Level

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ATTACHMENT A:

Email Correspondence received by County DPS from Mr. Tom Harrington

From: tom harrington [<mailto:tom.harrington@cox.net>]

Sent: Friday, November 01, 2013 3:35 PM

To: Gungle, Ashley

Cc: 'Olson, Cynthia'; 'kevin davis'; 'Tony Votaw'; 'Marcus Phares'; janelines@cox.net; 'Brian Rickey'; 'Sharon Schnautz'; 'Dave & Gail'; ricklinessr@cox.net; joe@joebradleyauctioneers.com; cheryl.gillott@parks.ca.gov; 'Gary Ruger'; anne.casey@cox.net; 'Rick Lines'; 'Mark Agee'

Subject: Ocotillo Wells Solar project Vision Impact

Points of conflict regarding **vision** impact and the Ocotillo Wells Solar project and M.U.P.

- Less than ½ mile downhill from the famous “**Elephant Trees Discovery Trail**” loop listed in the Anza Borrego State Park brochures as a must see. This destination located on Split Mountain Rd. is a huge draw for the park and boasts a fabulous view of the desert all the way to Arizona. **Elev. 240 ft.** <http://www.desertusa.com/mag98/april/stories/eletrail.html>
- Directly in the view line of “**Font’s Point**”. Another critical viewing vista recommended and maintained by the Anza Borrego State Park. **Elev.800 ft.** http://www.dirtopia.com/wiki/Fonts_Point_Trail
- Project is located less than 1 mile from the “**Fish Creek Trail**” also located on Split Mountain Rd. **Elev. 220 ft.** http://www.dirtopia.com/wiki/Fish_Creek_Trail
- Anza Borrego State Park’s “**Fish Creek Primitive Campground**” is located only 2.5 miles from the Proposed Solar Farm Project. Also located on Split Mountain Rd. . **Elev. 280 feet.** http://www.desertusa.com/anza_borrego/anza_borrego_pointsofinterest.html
- “**Arroyo Salado Primitive Campground**” **Elev.880 ft.** <http://freecampsites.net/#!6137&query=sitedetails>
- “**Superstition Mountain OHV Open Area**” 15 miles away **Elev. 438 feet.** <http://www.blm.gov/ca/st/en/fo/elcentro/recreation/ohvs/superstition.html>
- “**Blow Sands**” 7 miles away, Most popular destination in OHRV park. **Elev. 526 feet** <http://www.blowsand.com/>
- Elevation of the proposed **Ocotillo Wells Solar project.... Elev. 62 feet.** <http://gildredco.com/index.php/component/content/article?id=77>

Tom Harrington

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