4.1 **AESTHETICS**

This section describes the visual setting of the project area and evaluates the potential for changes in visual character with implementation of the project. This analysis provides information on the character of the existing visual landscape, the locations and types of public views within the project area, and the potential visibility of the project from these public viewing locations.

4.1.1 Existing Conditions

The discussion below describes the physical setting on and off the project site, particularly from a visual perspective, as well as the policies intended to guide future development from a visual perspective.

4.1.1.1 ON-SITE VISUAL ELEMENTS

The project site mostly consists of undeveloped land. A small one-story vacant building formerly used for the Fletcher Hills Golf Range and a small asphalt-paved parking lot are located on the southern portion of the site. A vacant area formerly used as a concrete storage facility is located in the northern portion of the project site. A large portion of the site (approximately 15.6 acres) consists of non-native grassland. Other vegetation on the site consists of eucalyptus woodland, disturbed habitat, broom baccharis scrub, and disturbed Diegan coastal sage scrub. A drainage channel is located along the eastern boundary of the property parallel to Cuyamaca Street. In addition, several narrow drainages are located in the southern portion of the project site (see Figure 4.3-3, On-Site Drainages).

The high points of the project site are located near the northwestern and southwestern corners of the site, approximately 410 feet above mean sea level (AMSL) and 385 feet AMSL, respectively. The elevation along the western property boundary is relatively high in elevation at an average of approximately 375 feet AMSL. From the western boundary of the project site, the project site slopes downward to the east and the majority of the site is relatively flat at approximately 360 feet AMSL. There is a high point in the middle of the project site with an elevation of approximately 375 feet AMSL.

4.1.1.2 OFF-SITE VISUAL ELEMENTS

The area surrounding the project site is characterized by Gillespie Field Airport and industrial and residential land uses adjacent to the project site. Due to the topography of the area, the residences to the west of the site and the industrial buildings to the south are generally slightly higher in elevation than the adjacent project site, while Gillespie Field to the east and industrial uses to the north are at a similar elevation as the project site. Ten homes are located adjacent to the project site. Seven of these houses are located along Paseo de Los Castillos and the other three are located off Pryor Drive.

To the north and west of the project site is the City of Santee, which is developed with a mix of residential, commercial, and industrial land uses. To the east and south of the project site is the City of El Cajon, also developed with various residential, commercial, and industrial uses. A concrete-lined section of the Forrester Creek channel borders the site to the northeast. The project site is located in the northwest corner of the Gillespie Field Airport property.

The project site is visible from the public viewshed on Weld Boulevard to the south of the project site and Cuyamaca Street to the east of the project site. Industrial development to the north of the project site blocks public views from Prospect Avenue. The residences along the western site boundary block public views from Rhone Road, Paseo de Los Castillos, and other public roads in the neighborhood to the west.

The project site is visible from a public bicycle trail that runs along Forrester Creek, which borders the project site to the northeast.

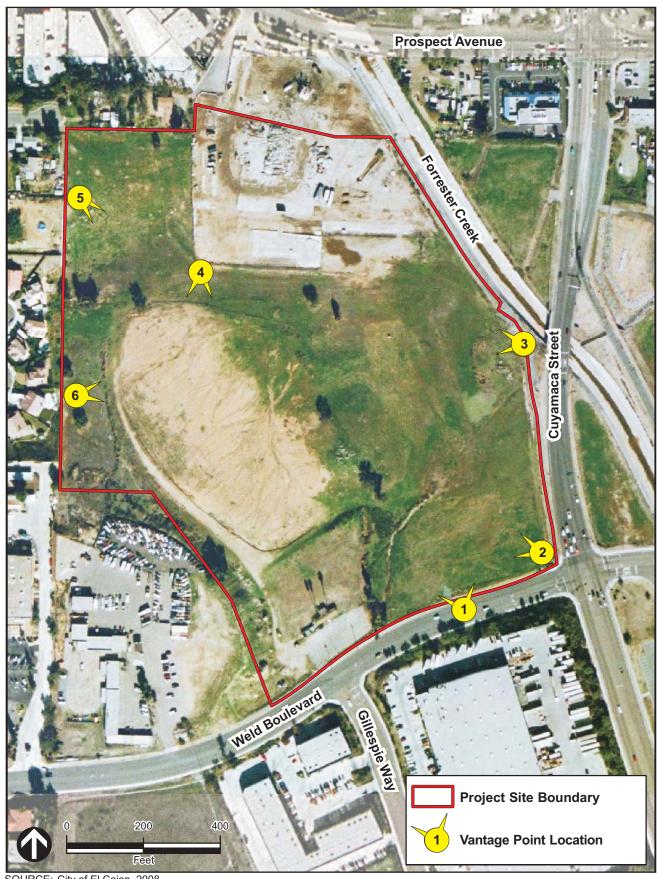
4.1.1.3 KEY VANTAGE POINTS

Visual sensitivity can be described as viewer awareness of visual changes in the environment and is based on viewers' activities in public areas near a particular site or area. Overall, higher degrees of visual sensitivity are associated with residential areas, outdoor recreational activities, and scenic driving. Areas with industrial or commercial uses are considered to have low to moderate visual sensitivity, as activities conducted in these areas are not significantly affected by the quality of the environment. Sensitivity is based on the overall visual character and visibility of the existing project site. To define the visual quality of the project area, typical views to and from the project site from public streets have been identified as key vantage points (KVPs). These KVPs offer views of the project site from areas to the north, south, and east. Public views from west of the project site are not identified because the project site would not be visible from public streets to the west, such as Paseo de Los Castillos, due to obstruction by existing residences. Four KVPs have been identified to represent the visual environment as seen from public viewsheds adjacent to the site (Figure 4.1-1). Each KVP has been assigned a number, which is identified in the discussion below and shown in Figures 4.1-2 through 4.1-3.

- KVP 1: KVP 1 provides a view looking north towards the site from the industrial park across from the southern boundary of the project site on Weld Boulevard (Figure 4.1-2). In the foreground and middle distance is disturbed habitat and non-native grassland area that increases in elevation toward the highpoint in the middle of the site. Some eucalyptus trees are visible in the western portion of the site. In the background of the view, the former concrete storage facility and industrial uses adjacent to the northern project boundary are visible. Obstructed views of undeveloped ridgelines are visible in the distant background.
- KVP 2: KVP 2 is a view looking northwest from the intersection of Cuyamaca Street and Weld Boulevard (Figure 4.1-2). In this view, non-native grassland is seen in the foreground. In the mid-ground is the high point in the middle of the project site. In the background of the view are the residences and the former concrete storage facility adjacent to the project site to the west and north, respectively.
- KVP 3: KVP 3 provides a view looking west from Cuyamaca Street and the bike trail along Forrester Creek (Figure 4.1-3). In the foreground of this KVP are large rocks, disturbed habitat, and non-native grassland habitat. In the middle distance is the high point in the middle of the site and non-native grassland habitat. In the background is the high ground on the west side of the project site, the adjacent residences, disturbed habitat, and eucalyptus woodland habitat.
- KVP 4: KVP 4 provides a view looking southeast from the southwest corner of the former concrete storage facility located on the project site (Figure 4.1-3). This KVP is meant to represent views from the industrial development north of the project site along Prospect Avenue. A chain-link fence and non-native grassland are visible in the foreground. Disturbed habitat and the high point in the middle of the site are visible in the mid-ground. In the background, non-native vegetation, disturbed habitat, the abandoned golf course building, and the industrial development on the south side of Weld Boulevard are visible.

In addition to the four KVPs listed above that represent public views, two KVPs have been identified that represent private views of the project site from the backyards of the residences located immediately to the west and northwest. The existing residences block public views of the project site from public streets to the west, including Paseo de Los Castillos and Pryor Drive. The two KVPs representing private views are shown in Figure 4.1-4.

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SOURCE: City of El Cajon, 2008



KVP 1: View looking north towards the project site from the industrial park south boundary of the project site on Weld Boulevard.



KVP 2: View looking northwest across the project site from the intersection of Cuyamaca Street and Weld Boulevard.

SOURCE: PBS&J, 2008



KVP 3: View looking west across the project site from the Forrester Creek bike trail, adjacent to Cuyamaca Street.



 ${\sf KVP 4: View \ looking \ south \ from \ the \ southwest \ corner \ of \ the \ concrete \ storage \ facility \ located \ in \ the \ northeastern \ portion \ of \ the \ project \ site.}$

SOURCE: PBS&J, 2008



KVP 5: View looking southeast from the slope in the northwest corner of the project site.



KVP 6: View looking east from the slope on the western boundary of the project site.

SOURCE: PBS&J, 2008

- KVP 5: KVP 5 is a view looking southeast from the slope in the northwest corner of the project site (Figure 4.1-4). This KVP is representative of the view from the backyard of the residences located off Pryor Drive northwest of the project site boundary. The residential buildings are located approximately 20 feet above the photo location; however, this area was not accessible and therefore the photo was taken from the closest accessible area. The foreground view consists of dirt, non-native vegetation, and the former concrete storage facility. The middle distance consists of eucalyptus woodland, disturbed habitat and the high point in the middle of the site. The background consists of Gillespie Field and industrial land uses. Undeveloped ridgelines are visible in the distant background.
- KVP 6: KVP 6 is a view looking west from the slope on the western boundary of the project site (Figure 4.1-4). This KVP represents the view from the backyard of the residences located on Paseo de Los Castillos west of the project site. The residential buildings are located approximately 10 feet above the photo location, however, this area was not accessible and therefore the photo was taken from the closest accessible area. The foreground view consists of non-native grassland and broom baccharis scrub. The high point in the middle of the site and disturbed habitat are visible in the mid-ground view. The background view consists of Gillespie Field Airport. In addition, undeveloped ridgelines are also visible in the distant background.

4.1.2 **REGULATORY FRAMEWORK**

The following State, regional and local plans provide visual resources and aesthetics guidelines for development within the proposed project area.

4.1.2.1 **STATE**

Scenic Highways Program

The California Scenic Highways Program was created by the California Scenic Highway Law in 1963 with the purpose of preserving and protecting scenic highway corridors from any change that would diminish the aesthetic value of lands adjacent to highways. State Scenic Highways are those highways that are either officially designated by Caltrans or are eligible for designation. The statewide system of scenic highways is part of the Master Plan of State Highways Eligible for Official State Designation as Scenic Highways. Scenic highway nominations are evaluated using the following criteria:

- The proposed scenic highway is principally within an unspoiled native habitat and showcases the unique aspects of the landscape, agriculture, or man-made water features;
- Existing visual intrusions do not significantly impact the scenic corridor;
- Strong local support for the proposed scenic highway designation is demonstrated; and
- The length of the proposed scenic highway is not short or segmented.

A highway's status changes from "eligible" to "officially designated" when the local jurisdiction adopts a Scenic Corridor Protection Program, applies to Caltrans for scenic highway approval, and receives notification from Caltrans that the highway has been designated as an official State Scenic Highway. Once a scenic highway is designated, the responsibility lies with the local jurisdiction to regulate development within the scenic highway corridor. This applies only to areas where the local agency has land use jurisdiction.

4.1.2.2 LOCAL

City of El Cajon General Plan 2000

The El Cajon General Plan 2000 (City 2001) includes basic goals, objectives, and policies for the management of visual resources. Citywide objectives and policies that apply to the project site include:

- Objective 1-6: The undergrounding of utility lines on a systematic basis will be continued.
 - Policy 1-6.1 The utilities for all new development and all major redevelopment in the city shall be undergrounded.
- Objective 1-7: The maintenance of required landscaping for commercial, industrial and multiple family development will be thoroughly enforced.
 - Policy 1-7.4 Required landscaping which has been allowed to die shall be replaced either by the property owner or by the City, which will then charge the property owner.
- Objective 4-4: The City, through ordinance, policy and practice, will strive to improve the quality of industrial development.
 - Policy 4-4.2 Undergrounding of distribution utility lines shall be accomplished where economically and technically feasible.
 - Policy 4-4.4 Judicious landscaping of developed properties and parking areas shall be required in industrial areas. Loading, storage and other unsightly areas shall be screened from residential and commercial areas. Vacant properties shall be maintained to keep them from becoming unsightly.
 - Policy 4-4.5 Adequate off-street parking facilities shall be provided for industrial development, as shall space for maneuvering, loading, docking, and storage.
 - Policy 4-4.6 The City shall require that all industrial operations excepting storage, loading and unloading shall be done inside buildings except as permitted under special circumstances.
- Objective 8-5: Achieve an urban form which respects the natural land forms of the area and preserves the unique contrast between the valley's level flood and the surrounding hills.

As discussed in Section 4.9, Land Use, the proposed project would be consistent with all applicable City of El Cajon General Plan goals, objectives and policies. It should be noted that the City of El Cajon does not have a view protection ordinance.

City of El Cajon Zoning Ordinance

The City of El Cajon Zoning Ordinance is consistent with the City's General Plan and Land Use Element and is the primary implementation tool for the Land Use Element. Zoning regulations for the City are adopted and established to serve the public health, safety, and general welfare and to provide the economic and social advantage resulting from an orderly use of the land resources. The Zoning Ordinance and Map identify specific types of land uses, intensity of uses, and development performance standards applicable to specific areas and parcels of land within the City. Several zoning regulations for Manufacturing (M) Zone pertain to visual resources:

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- Section 17.50.040 Uses in this zone shall be conducted within an enclosed building except uses customarily conducted in the open may be permitted by conditional use permit. All outdoor storage and permitted outdoor uses shall be screened from the public right-of-way by a minimum six-foot-high, solid fence or wall. This fence or wall shall not encroach into any required exterior yard. No storage shall exceed the height of the wall or fence.
- Section 17.50.110 No building or structure shall exceed the height of thirty-five feet, except that through the specific plan process height may be increased to fifty feet.
- Section 17.50.130 All disposable trash shall be stored in an area specially designed for such material and for recycling containers. This area shall be separated from view from any public right-of-way by a view-obscuring fence or wall and shall be kept in a neat and sanitary manner.
- Section 17.50.140 Walls:
 - District Boundary. A six-foot-high view-obscuring fence or wall shall be required along all interior property lines that form a district boundary with any residential zone district.
 - Reduction in Height of Wall. Walls or fences shall not exceed forty-two inches in height
 within ten feet of any exterior property line or the distance corresponding to the required
 exterior yard setback of any abutting residentially zoned or residentially developed property,
 whichever is the greater.
 - Under no circumstance shall any fence, wall or hedge, regardless of its location, block pedestrian or vehicular visibility for safe and easy circulation. In such event the director of community development shall determine the height of the fence, wall or hedge, if any, which shall be required.
- Section 17.50.150 Landscaping:
 - On Site. All exterior yards shall be landscaped and maintained to meet the following minimum standards:
 - Ten feet of landscaping immediately adjacent to all exterior property lines, except where there is a driveway;
 - o An average of twenty feet of landscaping, but in no case less than fifteen feet, between any building facade and all exterior property lines, except where there is a driveway.
 - o A minimum of one canopy tree that is at least a fifteen gallon size shall be located within thirty-five feet of every parking space not obstructed from view by a building;
 - o For the purpose of meeting any part of these standards, a landscaped area must have a minimum interior dimension that is at least four feet.
 - Public Right-of-way. All areas not in driveway or sidewalk between the street curb and the property line shall be landscaped and maintained.

Additionally, the general lighting zoning ordinance is applicable to the proposed project.

• Section 17.64.205 - An on-site lighting plan for all parking areas, pedestrian walkways and common open space/recreation areas shall be required for all projects except single-family residences unless the single-family residences are part of a planned unit development or a planned residential development. Such plan shall provide adequate lighting for pedestrian and vehicular safety and be sufficient to minimize security problems. However, in no case shall lighting on one property create a nuisance on any other property.

Gillespie Field Specific Plan 291

The Gillespie Field Specific Plan 291 applies to the area designated as Special Development Area 1 (SDA-1) as shown on the El Cajon General Plan Map. A specific plan is a plan for a particular portion of the city where circumstances require a more detailed plan of development and to allow for better-suited uses of the property than the current zoning would permit. The plan defines standards of development for plans proposed in the area.

Airport Land Use Compatibility Plan for Gillespie Field

The Airport Land Use Compatibility Plan (ALUCP) for Gillespie Field (San Diego Regional Airport Authority 2004) is mandated by Section 21675 of the Public Utilities Code. Member agency general and specific plans, zoning ordinances, and building regulations encompassing the airport influence area and airport master plans are subject to a determination of consistency with this plan. The plan was prepared to assist in achieving compatible land use development in the area surrounding Gillespie Field. The plan contains height restrictions that apply to the proposed project. Areas immediately adjacent to the Airport in every direction are zoned with height limits of 35 to 50 feet.

Gillespie Field Airport Layout Plan Update

The County of San Diego sponsored an Airport Layout Plan (ALP) Update (September 2005) to determine the extent, type, and schedule of development needed to accommodate future aviation demand at the airport and specific opportunities for improving facilities through a planning grant from the FAA Airport Improvement Program. The ALP contains height restrictions in Runway Protection Zones (RPZs). The approach surface governs the height of objects on or near the airport. Objects should not penetrate or extend above the approach surface. If they do, they are classified as obstructions and must be either marked or removed.

4.1.3 IMPACT SIGNIFICANCE CRITERIA

The criteria listed below for visual impact significance are derived from Appendix G of the CEQA Guidelines. Impacts would be considered significant if the proposed project would:

- 1. Have a substantial adverse effect on a scenic vista;
- 2. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway;
- 3. Substantially degrade the existing visual character or quality of the site and its surroundings; or
- 4. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

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4.1.4 ISSUE 1 – SCENIC VISTAS

Would the proposed project have a substantial adverse effect on a scenic vista?

4.1.4.1 IMPACT ANALYSIS

No scenic vistas are designated in the City of El Cajon General Plan. In addition, the City does not have a view protection ordinance that protects private views. However, for the purposes of this analysis, views of the undeveloped ridgelines east and northeast of the project site are considered to be scenic vistas. The views of these distant areas, as shown in KVPs 1, 5 and 6, would be altered by development of the proposed project. A summary of the impacts to these scenic vistas is described below.

In KVP 1, the proposed project would not block views of the distant ridgelines from the public viewshed along Weld Boulevard. The majority of users of Weld Boulevard are motor vehicle drivers and their passengers. Motorists and passengers are less sensitive to changes in the scenic vista due to limited duration of viewing, and location in relation to their point of focus. Travelers moving east on Weld Boulevard would look directly toward the ridgelines east of the project site, not to the northeast. Therefore, the proposed project would not block the existing views of the distant ridgelines to the east of the project site from Weld Boulevard. Development of the proposed project would partially block the view of the distant ridgelines from the industrial development south of the project site; however, industrial uses are not considered to be visually sensitive because use of industrial facilities is generally not affected by changes in visual quality. Therefore, development of the proposed project would not significantly impact scenic views from south of the project site.

KVPs 5 and 6 represent private views from the backyards of adjacent residences to the northwest and west of the project site, respectively. These private viewsheds currently include views of the distant ridgelines to the east and northeast of the project site. Development of the proposed project would partially block the views of these scenic vistas due to building construction. However, views would not be completely blocked from these private residences due to the difference in elevation between the residences and the proposed project site. As shown in Figure 4.1-5, cross-sections of Buildings C and D have been prepared to illustrate the elevation differences between the proposed buildings on the project site and the residential uses to the west. The residences represented in KVP 5 (closest to Building C) are built at an elevation of approximately 382 feet AMSL and the residences represented in KVP 6 (closest to Building D) are built at an elevation of approximately 387 feet AMSL. The proposed project site would be graded to an elevation of approximately 358 feet AMSL in the northern portion of the site in the vicinity of Building C and approximately 364 feet AMSL in the western portion of the site in the vicinity of Building D. The proposed industrial buildings would be a maximum of 35 feet tall and set back approximately 113 feet from the western property line. The maximum height of Building C would be 393.4 feet AMSL and the maximum height of Building D would be 399 feet AMSL. As shown in the cross sections of Buildings C and D in Figure 4.1-5, the views of the distant ridgelines from the residences to the northwest and west of the project site would be partially visible over the proposed industrial buildings due to the higher elevation of the existing residential buildings and the distance of 113 feet between the existing residential and proposed industrial uses. Therefore, development of the proposed project would partially impact scenic views from the northwest and west of the project site. However, as discussed above, the City does not have a view protection ordinance that protects private views. Therefore, this impact is considered less than significant.

No distant ridgelines are currently visible in KVPs 2, 3 or 4; therefore, development of the proposed project site would not significantly impact scenic views from the southeast, east or north of the project site.

4.1.4.2 SIGNIFICANCE OF IMPACT

Implementation of the proposed project would not have a substantial adverse effect on a scenic vista. Impacts would be below a level of significance.

4.1.4.3 MITIGATION, MONITORING AND REPORTING

No mitigation would be required because no significant impacts were identified.

4.1.5 ISSUE 2 – STATE SCENIC HIGHWAYS

Would the proposed project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

4.1.5.1 IMPACT ANALYSIS

No state scenic highways are identified in the vicinity of the proposed project. The nearest scenic highway is State Route (SR) 125 between Interstate 8 (I-8) and SR-94, approximately 3.5 miles from the project site. The proposed project site is not visible from this highway.

4.1.5.2 SIGNIFICANCE OF IMPACT

Implementation of the proposed project would not substantially damage scenic resources within a state scenic highway. No impact would occur.

4.1.5.3 MITIGATION, MONITORING AND REPORTING

No mitigation would be required because no significant impacts were identified.

4.1.6 ISSUE 3 – VISUAL CHARACTER OR QUALITY

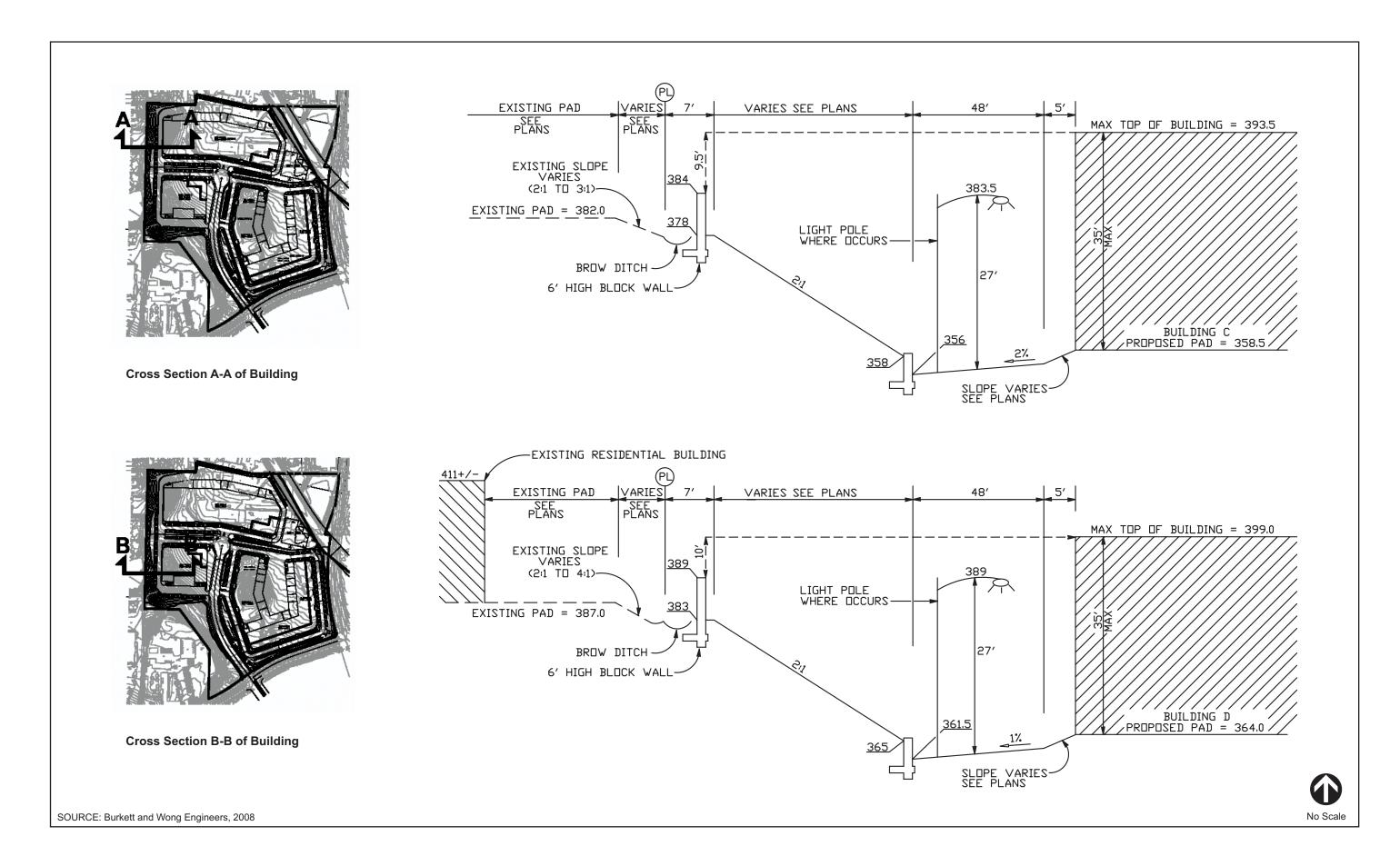
Would the proposed project substantially degrade the existing visual character or quality of the site and its surroundings?

4.1.6.1 IMPACT ANALYSIS

The proposed project would change the visual character of the site by developing the mostly undeveloped project site with an industrial park, new roadway, parking areas, and landscaping. The areas surrounding the project site are currently developed with industrial land uses, Gillespie Field Airport, and single-family residences. Gillespie Field Airport and industrial uses are not considered sensitive viewers because activities conducted in these areas are not significantly affected by the quality of the scenic environment. The proposed industrial project would be consistent with existing visual character of the airport and industrial development in these areas.

The proposed project would be visible from adjacent residences to the west and northwest. The easterly views from these homes currently consist of the undeveloped project site, Gillespie Field Airport, industrial development, and undeveloped ridgelines in the distant background. Development of the proposed industrial project would be consistent with the visual character of the existing nearby industrial development and Gillespie Field Airport. The currently undeveloped project site is not considered to be a scenic resource; therefore, the development of the site would not substantially degrade the existing visual

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character of the area. To the extent possible, the project site would be landscaped with native vegetation, consistent with the existing physical setting of the site. The proposed industrial project would be designed and constructed in compliance with the City of El Cajon's design standards to ensure that the development of the site would not result in a degradation of the existing visual character of the site or its surroundings. Therefore, the proposed project would not result in a significant impact to visual character or quality.

4.1.6.2 SIGNIFICANCE OF IMPACT

Implementation of the proposed project would not substantially degrade the existing visual character or quality of the site or its surroundings. Impacts would be less than significant.

4.1.6.3 MITIGATION, MONITORING AND REPORTING

No mitigation would be required because no significant impacts were identified.

4.1.7 ISSUE 4 – LIGHT OR GLARE

Would the proposed project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

4.1.7.1 IMPACT ANALYSIS

The proposed project would construct a new industrial park which would include nighttime lighting for security. Therefore, there would be an increase in night lighting in the area. The surrounding Gillespie Field Airport, industrial and residential developments may be impacted by the new source of nighttime lighting if the increase in lighting would result in a nuisance or hazard to these uses. Gillespie Field and the industrial developments are generally not occupied at night and would not be impacted by the increase in nighttime lighting. The nighttime lighting increase associated with the proposed project would be typical of lighting in the industrial areas that surround the project site. The proposed project lighting would be designed in compliance with the City's zoning ordinance which requires the development of an on-site lighting plan for all parking areas, pedestrian walkways and common open space/recreation areas to ensure that they provide adequate lighting for pedestrian and vehicular safety, but do not create a nuisance on any other property. As a project design feature, outdoor lighting would be directed toward the industrial buildings or parking areas and would not shine directly at residences. A photometric analysis was conducted to evaluate the brightness of the proposed project's outdoor lighting design at the property line with the residential homes north and west of the project site. The results of the photometric analysis indicated that nighttime lighting along the western boundary of the project site would not exceed 0.0 footcandles at the property line and, therefore, would not be a nuisance to the existing residential homes to the west. This is due to the distance of the industrial buildings from the western property line (approximately 113 feet), the higher elevation of the residential homes relative to the proposed project (the residential building pad is approximately 23 feet higher than the proposed Building D pad), and the proposed six foot high solid block wall along the northwestern site boundary. As shown in Figure 4.1-5, Cross Section B, the top of the solid block wall would be at the same elevation (389 feet AMSL) as the top of the driveway lighting pole; therefore, the block wall would prevent outdoor lighting from the project parking area from spilling onto the adjacent residential property.

However, along the northwestern boundary of the project site, a light reading of 0.9 footcandles would occur due to a proposed driveway lighting pole located near the site perimeter. Figure 4.1-6 shows the location of the 0.9-footcandle light level. Without any intervening structures, grade separations, or cutoff shields on the lightbulbs, the light from this lighting pole would be visible to the residential home north of the project site. However, as described in the project description, the proposed project includes the

construction of a six foot high solid block wall along the northwestern site boundary. With the proposed block wall in place and the inclusion of cutoff shields placed on the light fixtures, the light levels at the northwestern site boundary would be reduced to 0.0 footcandles and the light would no longer be visible to the residential home (pers. comm., Dan Mayorgas, P.E., MPE Consulting, November 19, 2008). In addition, all exterior project lighting would be directed away from adjacent land uses. Therefore, the lighting increase associated with the proposed project would not be incongruous in this setting and the project would not adversely affect nighttime views in the area. In addition, the proposed project would not include large expanses of glass or other highly reflective material that would result in substantial daytime glare. Therefore, the proposed project would not create a new source of substantial light or glare that would adversely affect views in the area.

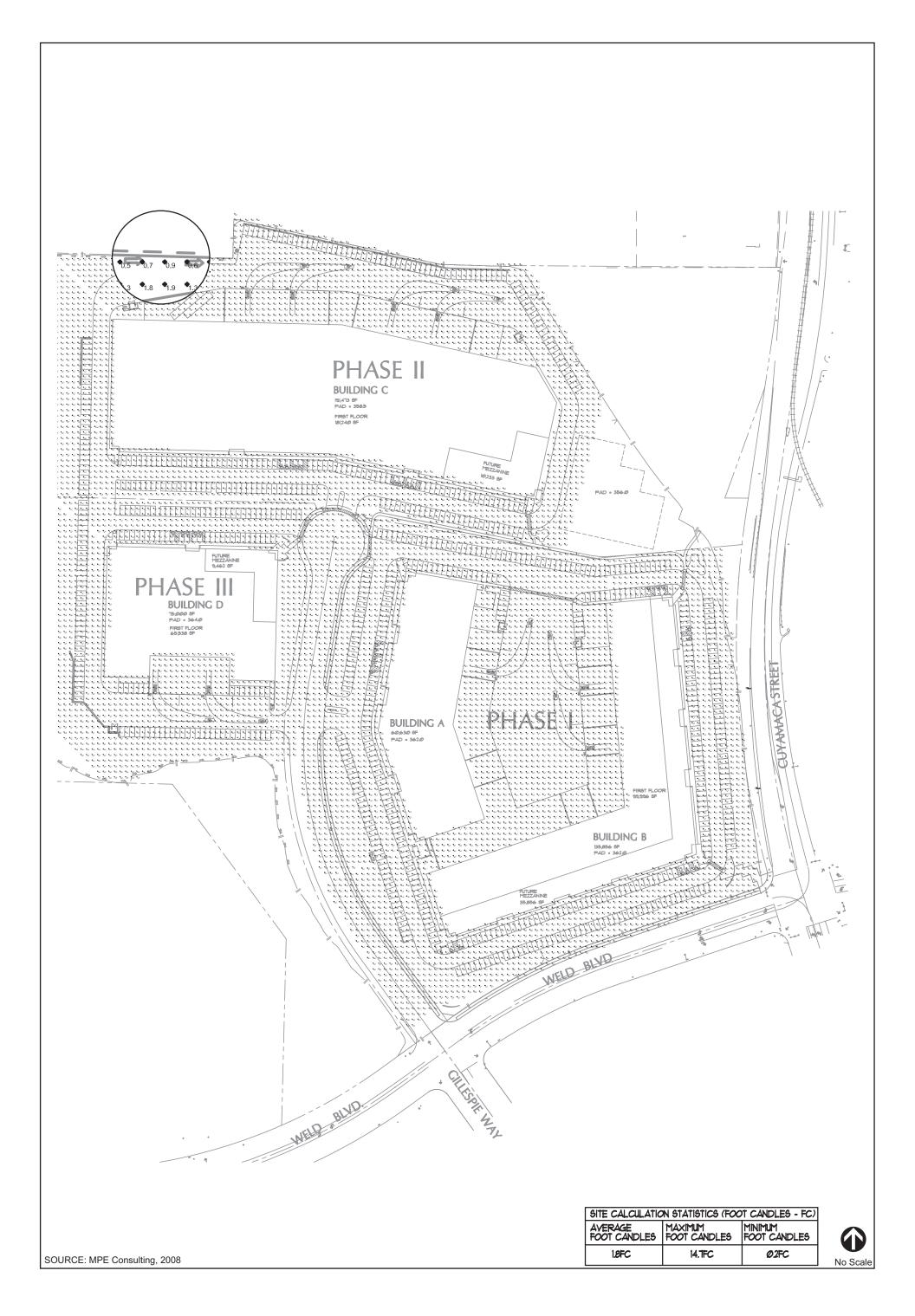
4.1.7.2 SIGNIFICANCE OF IMPACT

The construction of the proposed project would not result in substantial new sources of light or glare, which would adversely affect day or nighttime views in the area. Impacts would be below a level of significance.

4.1.7.3 MITIGATION, MONITORING AND REPORTING

No mitigation would be required because no significant impacts were identified.

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