

## **2.1      Aesthetics**

This section evaluates the potential changes to the existing aesthetic and visual characteristics of the Project site and vicinity that could result from development of the proposed JVR Energy Park Project (Proposed Project). The analysis focuses on the change in visual character, effects on views from scenic roads, visual compatibility with surrounding uses, and potential daytime or nighttime views that potentially could be disturbed by light and glare generated by the Proposed Project. The analysis is based on a review of existing resources, technical data, and applicable laws, regulations, and guidelines, as well as the following technical reports prepared for this Proposed Project:

- JVR Energy Park Project Visual Resources Technical Report (Appendix B)
- JVR Solar Project Glare Study (Appendix A of Visual Resources Technical Report)

The JVR Energy Park Project Visual Resources Technical Report (Appendix B) was prepared in accordance with the County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements – Visual Resources (County of San Diego 2007) and Guidelines for Determining Significance and Report Format and Content Requirements – Dark Skies and Glare (County of San Diego 2009).

As a component of the Visual Resources Technical Report, photographs of the Project site and surrounding area were taken during site visits conducted in fall 2018, winter 2018, and winter and spring 2019. The photographs illustrate the existing visual character and quality of the Project site and surrounding area as experienced during the site visits. The photograph locations are depicted in Figure 2.1-1, Existing Conditions Photographs Key Map.

Comments received in response to the Notice of Preparation (NOP) included concerns regarding glare and glint, scale of the Proposed Project footprint and proximity to community of Jacumba, visual intrusion, effects to visual quality and views from scenic vistas, light pollution, and effects to neighborhood character. These concerns are addressed in this section. A copy of the NOP and comment letters received in response to the NOP is included in Appendix A of this Environmental Impact Report (EIR).

### **2.1.1      Existing Conditions**

#### ***2.1.1.1      Project Site and Surrounding Area***

This section provides a regional overview of the Project area, and describes the existing visual character and quality of the Project site and surroundings.

## Project Site

The Project site is located within unincorporated San Diego County in the Jacumba Valley area. Composed of 24 privately owned parcels covering 1,357 acres, the Project site is located south of Interstate (I) 8 and north of the U.S./Mexico international border. Landforms on the Project site include the conical form of Round Mountain (the eastern slopes are within the Project site boundary), east-facing slopes west of the San Diego and Arizona Eastern Railway, and the valley floor that includes a dense to moderately vegetated floodplain. The site also features low, mounded hills in the northern portion, and a wide, pronounced hill in the eastern portion. The central and southern portions encompass flatter portions of the site that were previously used for farming.

According to the Biological Resources Technical Report for the Jacumba Valley Solar Energy Project (Appendix D), 11 vegetation communities and/or land covers occur on the Project site, including eight sensitive communities. Native vegetation communities within the boundaries of the Project site include Sonoran mixed woody scrub, Sonoran mixed woody and succulent scrub, mesquite bosque, and desert saltbush scrub. Two non-sensitive land covers, disturbed habitat and urban/developed, also occur on the Project site.

Although most of the northern area of the Project site is dotted with low to moderately tall woody shrubs, including creosote bush, clusters of relatively tall, spreading shrubs and occasionally trees, also occur on site. The areas of southern riparian forest are located outside of the development footprint of the solar facility. Pockets of semi-desert chaparral mark the westernmost and easternmost extents of the Project site. As viewed from I-8 and Carrizo Gorge Road, these higher-elevation areas are marked by low to moderately high chamise shrubs featuring light to dark green foliage with seasonal clusters of small, white flowers, and upright and woody bigberry manzanita. The solar facility is primarily proposed on areas that were previously used for agriculture; however, due to inactivity of previous agricultural activities, vegetation has recolonized areas located north and south of Old Highway 80. Figure 2.1-2, Existing Conditions Project Site, contains photographs of the existing terrain, vegetation, and development on the Project site.

Although the central and southern areas of the Project site have historically been used for farming and dairy operations, the Project site has been fallow since 2014. Buildings and other structures associated with a prior dairy, creamery, and ranch are located north of Old Highway 80 within the southern portion of the Project site. These buildings and structures were constructed over 45 years ago and are in various states of disrepair. Figure 2.1-3, Existing Conditions Project Site, includes views of the buildings and structures (see Photographs E and F). In addition to a collection of dilapidated wood frame, rusted metal siding, and broken concrete masonry unit structures, several vertical tanks/silos, a metal storage container, and concrete foundations are scattered in the area. Weathered wooden corrals and fencing, discarded and rusted farming machinery and equipment, empty concrete troughs, and a weathered and neglected barn and livestock house provide



additional evidence of past development. A narrow spur road extends east of the area and provides access to three vertical water tanks constructed east and upslope of the abandoned structures. Lands south and north of Old Highway 80 are situated at a lower elevation than the structures that are constructed atop a low hill. The lower-lying lands are disturbed and are traversed (or bordered) by dirt access roads or occasionally, by east/west and north/south irrigation ditches.

The central portion of the Project site is crossed by existing utility development. For example, two 500-kilovolt (kV) transmission lines (i.e., Southwest Powerlink and Sunrise Powerlink) supported by over 150-foot-tall lattice steel structures traverse the Project site in an east/west alignment. In addition, a 138 kV transmission line that supported the East County Substation 138 kV transmission line that is supported by vertical tubular steel poles parallels the 500 kV transmission lines across a portion of the Project site. Specifically, the transmission line transitions from underground to overhead on the Project site, as evidenced by the steel cable riser pole located west of Carrizo Gorge Road and near the Sunrise Powerlink and Southwest Powerlink crossings. Figure 2.1-3 includes photographs of the existing transmission lines (see Photographs G and H).

In the north-central area of the Project site, a hill has been visibly altered by excavation associated with production of construction aggregate materials. The top of the hill has been graded and leveled, and mounded piles of soil have been spread nearby to the northwest. The hill is accessed via a narrow gravel road that extends northeast to Carrizo Gorge Road. A portion of the Carrizo Gorge Road right-of-way (ROW) near the gravel road has been graded and leveled. At the time of the site visits, the area supported a construction materials storage/laydown yard featuring blue, rectangular dumpsters, and short and tall stacks of plastic bulk bins and lids. The laydown area extended west of Carrizo Gorge Road and stack materials were covered with black tarps/screens and setback from the road. Figures 2.1-2 and 2.1-3 include photographs of existing transmission infrastructure traversing the Project site and adjacent off-site lands. See Photographs A and B in Figure 2.1-2 and Photographs G and H in Figure 2.1-3. In addition, distribution facilities installed parallel to Old Highway 80 are shown in Figure 2.1-2 (see Photograph C).

### Surrounding Area

I-8 is located north of the Project site, with hilly to mountainous terrain farther north. The Project site extends to the U.S./Mexico international border to the south. A prominent hill, desert wash, and primarily undeveloped lands are located immediately adjacent to the Project site. Hilly to rugged terrain is located to the east beyond the Jacumba Airport. The existing 20-megawatt (MW) Jacumba solar development is located 1.75 miles east of the Project site boundary, and a regional 138 kV electrical substation (i.e., San Diego Gas & Electric [SDG&E] East County Substation) is located 1.9 miles away. North of Old Highway 80 and Jacumba Hot Springs, the western Project site boundary abuts undeveloped hilly and mountainous terrain, including Round Mountain and a mesa. As previously stated, the eastern slopes of Round Mountain are located within the Project

site. The unincorporated community of Jacumba Hot Springs is located adjacent to the southwestern portion of the Project site (see Figure 2.1-4A, Surrounding Lands and Public Lands Ownership in Vicinity). Recreational lands/facilities in the surrounding area comprise potential public vantage points to the Project site. The discussion below pertains to surrounding land uses and visual features that mark the general area. In addition, public lands in the vicinity are discussed, and Figure 2.1-4A is referenced as needed to clarify the location of these lands in the context of the Project site.

### North

The segment of Carrizo Gorge Road bordering (and occasionally traversing) the Project site is an approximately 30-foot-wide dirt road that extends northwest, passes under I-8, and provides access to a private resort (De Anza Springs). The dirt road is the sole access road to the De Anza Springs development. Although the resort is located approximately 0.50 miles north of the northwestern corner of the Project site, the proposed solar facility would not be visible due to intervening terrain. The northeastern corner of the Project site abuts two gas stations that include small convenience stores (see Photograph I in Figure 2.1-4, Existing Conditions Surrounding Area).

Terrain to the immediate north of Carrizo Gorge Road gradually climbs toward the separated travel lanes of I-8. In the Project area, I-8 consists of four total travel lanes (two in each direction) with paved shoulders and an approximately 80-foot-wide median covered with boulders of varying size; areas of exposed and rocky, brown/tan colored soils; and shrubs of low to moderate height. Sections of medians are mounded or swale-like and are occasionally crossed by short turnouts for law enforcement. North of I-8, the terrain is rocky and covered with low scattered shrubs that display olive to dark green to greyish tones. Prominent mountain terrain north of the Project site and I-8 includes Gray Mountain (3,780 feet above mean sea level) and Table Mountain (4,089 feet above mean sea level), both of which occur on public land managed by the Bureau of Land Management (BLM) and within the Table Mountain Resource Management Zone (RMZ). Table Mountain is located approximately 2 miles northeast of the Project site. Photograph J in Figure 2.1-4 illustrates the existing view north from Carrizo Gorge Road toward I-8 (obscured by terrain and vegetation) and boulder-covered mountains, including Gray Mountain (lower peak to the northwest).

Both Gray Mountain and Table Mountain are located in a large swath of primarily undeveloped land managed by BLM. Although designated/official trails have not been established by BLM, the peaks and surrounding BLM-managed lands are within the Table Mountain RMZ that provides opportunities for landscape viewing, off-highway-vehicle use, wildlife and wildflower viewing, hunting, and camping (BLM 2008).

## East

To the east, the landscape is largely undeveloped and features scrubby vegetation and boulders traversed by several dirt roads. Photograph K in Figure 2.1-4 provides a representative northwestward view from Old Highway 80 across the local desert landscape and toward the Project site (approximately 0.5 miles away). The Sunrise Powerlink and Southwest Powerlink transmission lines, which feature regularly spaced lattice steel towers, extend to the east and beyond the Project site. In addition, scattered rural residential development is located east of the Project site (generally near the Old Highway 80 and Carrizo Gorge Road intersection), and the Jacumba Airport is located south of Old Highway 80 and adjacent to the southeastern portion of the Project site. The East County Substation and Jacumba Solar facility are located more than 1.7 miles away and beyond the Airport Mesa landform. The existing facilities are not visible from Jacumba Hot Springs due to intervening terrain, and have limited visibility from Old Highway 80 due to setbacks.

Limited rural residential development occurs east of the Project site and along Old Highway 80. An approximately 2-acre fenced property located at the base of a prominent hill partially within the Project site and with direct access to Old Highway 80 includes several lightly colored, wood and stucco mobile and permanent residential buildings. The windows of several of the single-story buildings have been boarded, but signs of activity on site during the fall 2018 site visit suggests that one or more of the buildings is occupied. An electrical distribution and telephone line parallel Old Highway 80 and provide service to the property. Three additional rural residential properties are located near the base of the hill's east-facing slope and near the intersection of Old Highway 80 and Carrizo Creek Road. Photograph L in Figure 2.1-4 provides a westward view from Old Highway 80 at Carrizo Gorge Road toward rural residential development.

Jacumba Airport is located south of Old Highway 80, south and east of the Project site. Unattended and unlighted, the airport is used mainly as an operation area for gliders and receives most use on the weekends (County of San Diego 2019). The County of San Diego (County) owns the 2,562-foot-long asphalt runway (AirNav 2019), dirt helipad, two small single-story tan metal storage structures, and surrounding airport property. The property is protected by a gated driveway (permission to access the property is required) with direct access off Old Highway 80. A cleared dirt area north of the runway is used for facility parking. According to the County, approximately 1,162 "operations" occurred at the airport in 2018 (County of San Diego 2019). The parking area and runway are visible from Old Highway 80 (see Photograph M in Figure 2.1-5, Existing Conditions Surrounding Area).

The tall and broad form of Airport Mesa rises from the otherwise low desert terrain east of the Project site and Jacumba Airport. See Figure 2.1-4A for location and Photograph M in Figure 2.1-5 for a representative view of the landform from Old Highway 80. The majority of the steep-sloped

Airport Mesa landform and undeveloped desert lands to the north are managed by BLM as the Airport Mesa RMZ. Airport Mesa abuts the U.S./Mexico international border fence on the south, and a graded road to the summit provides an elevated vantage point from which U.S. Customs and Border Protection staff scan the border-adjacent landscape. The road is regularly patrolled by federal law enforcement and is within the portion of the mesa managed by BLM. Although primary recreation activities in the Airport Mesa RMZ are identified as target shooting, hiking, and hunting in the Eastern San Diego Planning Area Resource Management Plan (BLM 2008), a prohibition of target shooting on Airport Mesa was subsequently enacted by BLM in 2009. Official use is not recorded; however, BLM estimates that the area experiences low annual use (i.e., less than 200 visitors per year) (Williams, pers. comm. 2020).

The existing Jacumba Solar and East County Substation and facility are located approximately 1.75 and 1.9 miles east, respectively, of the Project site. See Figure 2.1-4A for location. Due to variations in terrain and the presence of a tall, broad hill, these facilities are not visible from the Project site and are obscured from view of motorists on Old Highway 80. Photograph N in Figure 2.1-5 provides a representative view of the substation from Old Highway 80. Relatively clear, albeit short-duration, views to the facilities are available from eastbound I-8. The electrical substation encompasses a large area (approximately 58 acres) and includes two separately fenced and graveled yards that support a variety of equipment, including air insulated electrical buses; steel support structures, including vertical buses and bays; transformers; disconnect switches; and communication gear (CPUC and BLM 2011). As a regional hub for electrical conveyance, numerous tall lattice steel towers and tubular steel poles are installed north, east, south, and west of the substation yards.

The Jacumba Solar facility consists of approximately 81,000 photovoltaic (PV) panels on approximately 2,200 fixed-title racks (approximately 12 feet tall) across 108 acres (County of San Diego 2016a). A collector substation is also located in the fenced site that is surrounded by the characteristic vegetation and terrain of the local desert landscape. In addition to the low profile of solar panels, the presence of Airport Mesa, a tall and broad hill to the west, the U.S./Mexico international border fence to the south, and the Jacumba Mountains to the east limits viewing opportunities from Old Highway 80 and the surrounding area.

## South

The U.S./Mexico international border fence parallels the southern boundary of the Project site. In the Project area, the border fence is a straight, 15-foot-tall, tan and brown slatted steel structure that traverses the desert landscape from east to west. Although nearly continuous, unconstructed gaps in the fence occur at particularly steep terrain in the Project area, including the west and east slopes of Airport Mesa (see Figure 2.1-5, Photograph N that partially depicts Airport Mesa) and at the west-facing slope of the Jacumba Mountains. South of the border within Mexico, a wide

valley is bordered by the rugged and rocky Sierra de Juarez Mountains to the east and hilly terrain to the southwest. Within Mexico, scattered rural residential development and the village of Jacume are located in the vicinity.

## West

South of Round Mountain and west of the Project site, the local terrain gradually rises to create a moderately sloped mesa landform. The mesa encompasses lands recently acquired by the California Department of Parks and Recreation and added to Anza-Borrego Desert State Park (SP). Existing utility development that traverses the Project site continues west across the rising east-facing slopes and the relatively flat mesa. The slopes and mesa are also traversed by access roads used by utilities to maintain the transmission lines. Photograph O of Figure 2.1-5 provides a representative northwestward view from Old Highway 80 across the Project site and toward the mesa landform and Round Mountain. Existing steel lattice towers are faint but visible atop the mesa. The pyramidal landform visible in Photograph O, Jacumba Peak, is managed by State Parks, included within Anza-Borrego Desert SP, and is approximately 0.75 miles west of the Project site.

The unincorporated community of Jacumba Hot Springs is located south of the mesa landform and west of the Project site. The community is bisected by Old Highway 80, which functions as the sole commercial corridor and access road in the community. The area predominantly consists of single-story residences on fenced lots dotted with mature trees. Photograph P in Figure 2.1-5 depicts an eastward view from Old Highway 80 near the community library. As illustrated in the photograph, residences and mature trees line the highway corridor through the eastern extent of the community. Although most properties support one single-family residential structure, an approximate 2.4-acre lot located immediately west of the Project site and north of Old Highway 80 is developed as the 20-lot Wagon Wheel Trailer Park. In addition to local residences located north of Old Highway 80 (approximately 150 residences are located north of the highway), approximately 20 single-family residences are scattered on the hilly terrain south of the highway and west of Jacumba Community Park. Photograph Q in Figure 2.1-5 provides a view across Old Highway 80 at Jacumba Street toward hillside and hilltop rural residences.

In addition to residential land uses, the community of Jacumba Hot Springs includes limited commercial development, a post office, and County library branch. These uses, and Jacumba Elementary School, are located off Old Highway 80. See Photograph R in Figure 2.1-6, Existing Conditions Surrounding Area. Vacant one- and two-story structures are scattered north of Old Highway 80. The vacant structures display a rustic aesthetic characterized by wood and tan painted stucco exteriors, small overhangs, and high-fronted facades (see Figure 2.1-6, Photograph S). The small and rectangular post office building fronts Railroad Street and is located north of a vacant car wash business housed in a blocky white and teal-trim structure.

The Jacumba Branch Library and adjacent Jacumba Community Park are located south of Old Highway 80. The library property is planted with several mature pine and deciduous trees. In addition to the rectangular, single-story library building that features a pink-red exterior with dark green trim, a dirt parking lot and playground are featured on the property. The community park is located south of the library and consists of a single basketball court and a dirt baseball/softball field. Photograph T in Figure 2.1-6 shows the park's basketball court and more distant baseball/softball field. The park property is bordered by the Project site on the east and south.

### ***2.1.1.2 Scenic Vistas, Scenic Highways, and Recreation Areas***

#### **Scenic Vistas**

There are no designated scenic vistas or lookouts in the local area that include views of the Project site. In addition, there are no segments of an adopted County or state trail system in the Jacumba area, and no segments of trails within the Boulevard Community Trails and Pathways Plan offer views to the Jacumba Valley area or Project site (County of San Diego 2005). However, mountain terrain, including Round Mountain, Table Mountain, the southern extension of the Jacumba Mountains in San Diego and Imperial Counties, and Airport Mesa are in the surrounding area and are potential vantage points for scenic views. In addition, the Project site is visible from Old Highway 80, I-8, Jacumba Community Park, and Anza-Borrego Desert SP lands. Although each area receives infrequent use, an assessment of existing views available to recreational users at Jacumba Community Park (managed by the County of San Diego), Anza Borrego Desert SP lands adjacent to the site and to the north, and Carrizo Canyon and Jacumba Mountains Wildernesses located north of I-8 is provided. Quality of existing views to the surrounding area, including the Project site, are also assessed from BLM-managed lands, including Round Mountain, Table Mountain (and mesa to the south; both located in the Table Mountain RMZ), Airport Mesa, and the Jacumba Mountains. These detailed assessments are provided in the Visual Resources Report (Appendix B).

#### **Scenic Highways**

There are no official state-designated highways in the surrounding area of the Project site. The closest officially designated state scenic highway is State Route 78, located approximately 35.5 miles north of the site and in Anza Borrego Desert (Caltrans 2017). The majority of I-8 that extends through San Diego County is an eligible state scenic highway and a component of the County Scenic Highway System (Caltrans 2017; County of San Diego 2011a). Old Highway 80, which parallels the Project site for approximately 1 mile, is also included in the County Scenic Highway System (County of San Diego 2011a).

Views to the Project site are intermittently available from I-8 for approximately 1.2 miles. East of Round Mountain, the Project site is visible to eastbound motorists, but partially obstructed by vegetation within the Carrizo Creek corridor to the southeast. The brief, partially obstructed views to the Project site are available for seconds and are abruptly blocked by an intervening hill south of I-8. Near the Carrizo Gorge Road off-ramp, motorists pass the intervening hill, and views to the south briefly open to reveal the Project site and a prominent hill east of the Project site. The presence of mounded, rocky, and vegetated median terrain regularly blocks the Jacumba Valley and Project site from view of westbound motorists. However, uninterrupted views to the Project site are available to westbound motorists for approximately 0.40 miles, roughly from the Carrizo Gorge off-ramp to the intervening hill south of I-8, as described above.

Regarding public roads, views toward the Jacumba Valley area and nearby hills and mountains are available from Old Highway 80 and Carrizo Gorge Road. The Project site parallels Old Highway 80 to the north and south from approximately Laguna Street to the Jacumba Airport/glider port driveway (0.95 miles). From westbound Old Highway 80 near Airport Mesa, a prominent hill blocks most of the Project site from view. However, views to portions of the northern and southern Project site are occasionally available, and visibility of the southern Project site increases on the approach to Jacumba Airport. As the highway descends and approaches Jacumba Hot Springs from the west, hilly terrain, residential structures, and mature trees along the corridor block views to the Project site. Within the community of Jacumba Hot Springs, mature trees planted parallel to the highway screen the Project site from view of eastbound motorists.

### Recreation Areas

Recreation areas within the Proposed Project viewshed include local, state, and federal lands. Specifically, these include Jacumba Community Park that is located immediately west of the southern portion (i.e., south of Old Highway 80) of the Project site. State lands include Anza-Borrego Desert SP, which is located west and northwest of the Project site. Federal lands include BLM-managed lands encompassing the summit of Round Mountain (and its west- and south-facing slopes), Airport Mesa RMZ, Table Mountain RMZ, and the Jacumba Mountain Wilderness. As shown in Figure 2.1-4A, the RMZs are located east and northeast of the Project site, respectively, and the Jacumba Wilderness is located approximately 4 miles east of the site in Imperial County.

The local, state, and federal recreation facilities and lands in the surrounding area receive low use throughout the year. For example, the Jacumba Community Park is assumed to receive relatively low regular use throughout the year, but the Jacumba Community Services District occasionally holds seasonal festivals for the community at the park (a fall festival was held in October 2019; East County Magazine 2020). Table Mountain receives occasional use by the Jacumba Hikers and Walkers group. Actual usage is not recorded; however, the BLM estimates that the Table Mountain

RMZ receives low use throughout the year (i.e., less than 20 visitors per year) (Williams, pers. comm. 2020). Lastly, the southern extent of the Jacumba Mountains and adjacent wilderness are also estimated to receive low public use (i.e., approximately 1,500 visitors per year) (Williams pers. comm. 2020).

### **2.1.1.3 Project Viewshed**

The Proposed Project viewshed is primarily defined by the presence of hilly and mountainous terrain west, north, and east of the Project site. Views to the Project site are available from prominent terrain in the area, including Round Mountain, State Park lands to the west and northwest, Table Mountain to the northeast (approximately 2 miles away), Airport Mesa (approximately 1 mile away), and the Jacumba Mountains (approximately 3 miles away). These areas are public lands managed by BLM for dispersed recreation, designated wilderness (Jacumba Wilderness), and conservation (Table Mountain Area of Critical Environmental Concern). Views are also available to Jacumba Hot Springs. For example, based on the viewshed, views to the Project site are available to local residents near the western and southwestern boundary of the Project site and a limited number of homes constructed along Boundary Creek near the paved extent of Railroad Street. Further, the viewshed encompasses properties adjacent to the southwest corner of the Project site (including Jacumba Community Park), and homes on elevated, east-facing slopes near South Railroad Street.

The viewshed also extends to segments of I-8, Old Highway 80, and several local roads in the immediate surrounding area. Although the segment of I-8 in the viewshed is located at a greater elevation than the Project site, and the local terrain tends to fall south from the interstate, the presence of mounded embankments (road cuts) and median and interstate-adjacent shrubs occasionally screen or obscure the Project site from view of passing motorists.

Lastly, the U.S./Mexico international border fence is taller than the proposed solar modules to be installed, but components, including 138 kV generation transmission (gen-tie) line poles and equipment at the proposed collector substation, would be taller than the border fence. As such, views to proposed components would extend south into Mexico, and more specifically, to the small community of Jacume and to the slopes of the Sierra de Juarez Mountains.

A topographic viewshed of the Proposed Project is presented in Figure 2.1-7, Topographic Viewshed of Proposed Project. The figure illustrates the approximate viewshed of the Proposed Project based on topography and the tallest solar facility component (65-foot-high support poles for the 138 kV overhead slack span transmission line). The viewshed represents a worst-case assessment of the potential extent of available views to the Proposed Project from the surrounding area. Potential screening effects due to vegetation and/or structures at specific locations or viewpoints are not considered or reflected in Figure 2.1-7.



#### **2.1.1.4 Viewer Groups**

Viewer groups analyzed in this analysis consist of individuals that frequent public viewpoints in the surrounding area. Three viewer groups were identified: motorists, residents, and recreationists.

##### **Motorists**

Mobile views of the Jacumba Valley, including the Project site, are available to motorists on I-8, Old Highway 80, and Carrizo Gorge Road. Views from I-8 are relatively brief and occasionally impeded by intervening terrain and median boulders and vegetation. Old Highway 80 parallels the Project site for approximately 1 mile. Carrizo Gorge Road parallels the northeastern portion of the Project site, and the dirt segment west of the Jacumba Shell gas station borders the northern portion of the site. Visibility to the Project site from Carrizo Gorge Road is typically limited by the presence of rising terrain and vegetation north of the road, and by development and vegetation south of the road.

Given the scenic designation of these roads and high to moderate usage of I-8 (approximate average daily traffic of 16,000 vehicles) (Caltrans 2019) and Old Highway 80 (approximate average daily traffic of 500 vehicles) (SANDAG 2019), motorists on these roads are assumed to have high viewer awareness for changes occurring in the visual environment. Although view exposure of the Project site from Carrizo Gorge Road is relatively brief and occasionally screened, motorists on Carrizo Gorge Road are considered to have high awareness to changes in the landscape.

##### **Residents**

In 2010, the total population of the community of Jacumba Hot Springs was 561 persons (Census Viewer 2019). Jacumba residents would be highly aware of changes in the landscape. Further, residents typically have high concern regarding potential effects to the quality of existing views available from their homes.

Residential land uses border the western boundary of the Project site. Although uninterrupted views to the Project site are available to the closest properties, views to more distant residences, such as those west of Campo Street, are blocked by intervening residential development and private yard landscaping. South of Old Highway 80, a single residence is bordered by the Project site on three sides. Further, approximately 25 residential structures are constructed on a collection of low hills located south of Old Highway 80 and west of Jacumba Community Park, and views to the Project site are likely available from these residences. Lastly, three to five homes are located off Old Highway 80 north and northeast of the Jacumba Airport. Views to the Project site from homes located north of Old Highway 80 and immediately west of Carrizo Gorge Road are blocked by intervening terrain. Clear and uninterrupted views to the southern Project site (i.e., south of Old Highway 80) are available from the homes north of the Jacumba Airport.

## Recreational Users

Recreational opportunities in the Project area are briefly described in Section 2.1.1.2, Scenic Vistas, Scenic Highways, and Recreation Areas. Except for Jacumba Community Park, each of the identified recreational areas primarily supports passive trail-based recreation, such as hiking, nature viewing, and photography. Because trail users typically move through the landscape at a walking rate of speed, opportunities for longer-duration views are available. However, given the relatively remote location of the Project site and lack of formal trailheads and staging areas for trails, and based on the estimated annual use of nearby BLM-managed lands, the daily volume of recreationists actively recreating near the Project site and on nearby public lands (and at Jacumba Community Park) on a daily basis is assumed to be low. Despite low usage and temporary view exposure, viewer awareness for trail-based recreationists is moderately high.

### **2.1.2 Regulatory Setting**

#### Federal Regulations

##### **Bureau of Land Management Eastern San Diego County Resource Management Plan and Record of Decision**

The Eastern San Diego County Resource Management Plan and Record of Decision guide the development and management of the Eastern San Diego County Planning Area, an area spanning an eastern escarpment of Southern California's Peninsular Ranges and including more than 100,000 acres of public land administered by the BLM (BLM 2008). The Resource Management Plan also addresses conflicts among various recreational users accessing BLM lands; provides direction for future site-specific development, including renewable energy projects; and provides for plan monitoring to determine the effectiveness of BLM land management strategies. Further, the Resource Management Plan stresses that future policy decisions and land management strategies be compatible with the multiple-use mission of BLM that entails the management of recreational use and responsible development on public lands while also maintaining environmental quality (BLM 2008).

#### State Regulations

##### **California Scenic Highway System**

Created by the California State Legislature in 1963, the California Scenic Highway Program includes highways designated by the California Department of Transportation (Caltrans) as scenic. There are five officially designated scenic highways in San Diego County, and the nearest (State Route 78 from the west to east boundary of Anza-Borrego Desert SP) is located within 30 miles of the Project site. However, I-8 is an eligible state scenic highway from State Route 67 to the

eastern San Diego County border (Caltrans 2017). At its closest location, I-8 is located approximately 220 feet north of the northern Project site boundary.

### California State Historic Routes

Old Highway 80 is a designated California State Historic Route. In 2006, the state legislature granted this designation in recognition of the highway's "outstanding natural, cultural, historic, and scenic qualities." Despite this description, the designation does not influence the development of public and private properties adjacent to Old Highway 80 (Assembly Concurrent Resolution 123; State of California Legislature 2006).

### Anza-Borrego Desert State Park General Plan

Although the Project site is located entirely on private lands under the land use jurisdiction of the County, the proposed development would be visible from lands within Anza-Borrego Desert SP. The overall long-range purpose and vision for the park is established in the Anza Borrego Desert State Park General Plan that was approved by the California State Parks and Recreation Commission in February 2005 (California State Parks 2005). Since then, the Parks and Recreation Commission approved a Cultural Preserve Management Plan in November 2012, but no updates to the 2005 General Plan have been made. Because the General Plan is only applicable to State Park lands, the goals and guidelines of the Anza-Borrego Desert State Park General Plan are not applicable to the Proposed Project.

### Local Regulations

#### San Diego County General Plan

The San Diego County General Plan, through elements established to address the various issues accompanying planning and development, provides guidance for the protection of visual resources. Select policies within the Land Use, Mobility, and Conservation and Open Space Elements of the General Plan address the protection of existing visual character and quality of areas, and contain general direction regarding the minimization of adverse impacts to visual resources. Policies from the remaining elements of the San Diego County General Plan are not considered applicable since they do not concern the protection of visual resources.

The following goals and policies of the Land Use (LU), Mobility (M), and Conservation and Open Space (COS) Elements concern the preservation of visual and scenic resources. Although pertinent to protection of visual quality and quality, the County's visual resource guidelines (County of San Diego 2007) do not specifically require a consistency evaluation between General Plan goals and policies and developments proposed in the County. Still, the goals and policies below apply to

visual resources, and therefore are included for informational purposes (County of San Diego 2011a, 2011b, 2011c):

- **Goal LU-2: Maintenance of the County's Rural Character.** Conservation and enhancement of the unincorporated County's varied communities, rural setting, and character.
  - **Policy LU-2.8: Mitigation of Development Impacts.** Require measures that minimize significant impacts to surrounding areas from uses or operations that cause excessive noise, vibrations, dust, odor, aesthetic impairment and/or are detrimental to human health and safety.
  - **Policy LU-2.9: Maintaining Rural Character.** Consider level of service criteria, in accordance with Policy M-2.1, to determine whether adding lanes to a Mobility Element road would adversely impact the rural character of a community or cause significant environmental impacts. In those instances, consider other options to mitigate LOS [level of service] where appropriate.
- **Goal LU-6: Development – Environmental Balance.** A built environment in balance with the natural environment, scarce resources, natural hazards, and the unique local character of individual communities.
  - **Policy LU-6.6: Integration of Natural Features into Project Design.** Require incorporation of natural features (including mature oaks, indigenous trees, and rock formations) into proposed development and require avoidance of sensitive environmental resources.
  - **Policy LU-6.9: Development Conformance with Topography.** Require development to conform to the natural topography to limit grading; incorporate and not significantly alter the dominant physical characteristics of a site; and to utilize natural drainage and topography in conveying stormwater to the maximum extent practicable.
  - **Policy LU-10.2: Development – Environmental Resource Relationship.** Require development in Semi-Rural and Rural areas to respect and conserve the unique natural features and rural character, and avoid sensitive or intact environmental resources and hazard areas.
  - **Policy LU-11.2: Compatibility with Community Character.** Require that commercial, office, and industrial development be located, scaled, and designed to be compatible with the unique character of the community.
  - **Policy LU-12.4: Planning for Compatibility.** Plan and site infrastructure for public utilities and public facilities in a manner compatible with community character, minimize visual and environmental impacts, and whenever feasible, locate any facilities and supporting infrastructure outside preserve areas. Require context sensitive

Mobility Element road design that is compatible with community character and minimizes visual and environmental impacts; for Mobility Element roads identified in Table M-4, an LOS D or better may not be achieved.

- **Policy M-4.5: Context Sensitive Road Design.** Design and construct roads that are compatible with the local terrain and the uses, scale and pattern of the surrounding development. Provide wildlife crossings in road design and construction where it would minimize impacts in wildlife corridors.
- **Policy COS-11.1: Protection of Scenic Resources.** Require the protection of scenic highways, corridors, regionally significant scenic vistas, and natural features, including prominent ridgelines, dominant landforms, reservoirs, and scenic landscapes.
- **Policy COS-11.2: Scenic Resource Connections.** Promote the connection of regionally significant natural features, designated historic landmarks, and points of regional historic, visual, and cultural interest via designated scenic corridors, such as scenic highways and regional trails.
- **Policy COS-11.3: Development Siting and Design.** Require development within visually sensitive areas to minimize visual impacts and to preserve unique or special visual features, particularly in rural areas, through the following:
  - Creative site planning;
  - Integration of natural features into the project;
  - Appropriate scale, materials, and design to complement the surrounding natural landscape;
  - Minimal disturbance of topography;
  - Clustering of development so as to preserve a balance of open space vistas, natural features, and community character; and
  - Creation of contiguous open space networks.
- **Policy COS-11.7: Underground Utilities.** Require new development to place utilities underground and encourage “undergrounding” in existing development to maintain viewsheds, reduce hazards associated with hanging lines and utility poles, and to keep pace with current and future technologies.
- **Policy COS-12.1: Hillside and Ridgeline Development Density.** Protect undeveloped ridgelines and steep hillsides by maintaining semi-rural or rural designations on these areas.

- **Policy COS-12.2: Development Location on Ridges.** Require development to preserve the physical features by being located down and away from ridgelines so that structures are not silhouetted against the sky.
- **Policy COS-13.1: Restrict Light and Glare.** Restrict outdoor light and glare from development projects in Semi-Rural and Rural Lands and designated rural communities to retain the quality of night skies by minimizing light pollution.
- **Policy COS-13.2: Palomar and Mount Laguna.** Minimize, to the maximum extent feasible, the impact of development on the dark skies surrounding Palomar and Mount Laguna observatories to maintain dark skies which are vital to these two world-class observatories by restricting exterior light sources within the impact areas of the observatories.

In addition to goals and policies, the General Plan Conservation and Open Space Element establishes a County Scenic Highway System that is composed of scenic corridors that includes County roads, state routes, and interstate freeways. Within the Project area, I-8 and Old Highway 80 are included in the County Scenic Highway System (County of San Diego 2011a).

### Mountain Empire Subregional Plan

The Project site is located within the Mountain Empire Subregion of San Diego County. The Mountain Empire Subregional Plan contains policies applicable to visual resources, and thus are applicable to the Proposed Project. The following goals, policies, and recommendations established in the Subregional Plan are relevant to the Proposed Project (County of San Diego 2016b):

- **Land Use – General Goal (Policy and Recommendation 1):** The landforms of the Subregion are an important environmental resource that should be respected in new development. Hillside grading shall be minimized and designed to blend in with the existing natural contours.
- **Conservation – Environmental Resources (Policy and Recommendation 4):** The dark night sky is a significant resource for the Subregion and appropriate steps shall be taken to preserve it.
- **Conservation – Environmental Resources (Policy and Recommendation 6):** Development shall not adversely affect the habitat of sensitive plant and wildlife species or those areas of significant scenic value.
- **Scenic Highways Goal:** Establish a network of scenic highway corridors within which scenic, historical and recreational resources are protected and enhanced.

## Jacumba Subregional Group Area

Although a community plan has not been prepared for Jacumba Hot Springs, the community has developed a Vision Statement that includes “beautiful scenery” as a community “want” (County of San Diego 2011d). In regards to new development, the Vision Statement includes the following:

The community supports new development that is compatible with, and preserves the natural and historical environment, including water resources, and protects existing neighborhoods, manages growth to reinforce the rural small town character of the area, which includes agriculture, open space, and trails as important elements of the community.

The Vision Statement does not include a list of goals or policies.

## San Diego County Zoning Ordinance – Section 6322 Outdoor Lighting and Section 6324 Lighting Permitted in Required Yards

These sections of the County Zoning Ordinance establish regulations to control excessive or unnecessary outdoor light emissions that produce unwanted illumination of adjacent premises within the unincorporated area of the County. In addition to the prohibition of certain lighting sources, including searchlights, lighting for advertisements and lighting for recreational facilities (see Section 6322), requirements for yard lighting are established in Section 6324.

## *San Diego County Zoning Ordinance – Section 6954 Solar Energy Systems*

Section 6954 of the County Zoning Ordinance regulates Solar Energy Systems. Section 6954(b)(2) specifies that a PV solar energy system for off-site uses with a project area greater than 10 acres is considered a Major Impact Service and Utility within all zones and requires a Major Use Permit. In addition, Section 6954(b)(3) specifically relates to visual resources and requires that the following measures be implemented to minimize the visual impacts of a project:

- Removal of existing vegetation shall be minimized.
- Internal roads shall be graded for minimal size and disruption.
- Any accessory buildings shall be painted or otherwise visually treated to blend with the surroundings.
- A structure shall be non-reflective in all areas possible to blend with the surroundings.

## San Diego Light Pollution Code

The Light Pollution Code was developed by the County of San Diego Department of Planning & Development Services and Department of Public Works in cooperation with lighting engineers, astronomers, and land use planners from SDG&E and the Palomar and Mount Laguna Observatories. In addition, local planning and sponsor groups from the County aided in the development of the Light Pollution Code that is intended to address and minimize the impact of new sources of light pollution on nighttime views.

For purposes of establishing lighting regulations, the Light Pollution Code separates the unincorporated portion of San Diego County into Zone A and Zone B. Zone A includes all unincorporated lands located within a 15-mile radius of the Palomar or Mount Laguna Observatories, and Zone B includes all areas outside of Zone A. Section 59.105 includes general lighting requirements applicable to all unincorporated lands in San Diego County, and Section 59.106 includes shielding requirements per fixture by lighting type (i.e., outdoor lighting used for outdoor sales, eating areas, or advertisements [Class I]; security lighting [Class II]; and decorative lighting [Class III]) and according to location (Zone A or B). Because the Mount Laguna Observatory is located greater than 15 miles from the Project site, the Proposed Project is in Zone B (San Diego County Code of Regulatory Ordinances, Title 5, Chapter 2, Light Pollution).

### 2.1.3 Analysis of Project Effects and Determination as to Significance

Impacts to visual resources are evaluated based on specified thresholds identified in the County of San Diego's Guidelines for Determining Significance: Visual Resources (County of San Diego 2007) and Dark Skies and Glare (County of San Diego 2009).

For the purposes of this analysis, the switchyard is a component of the Proposed Project and has been analyzed as part of the whole of the action. However, the EIR highlights the specific analysis of the switchyard under each threshold of significance in the event that responsible agencies have California Environmental Quality Act (CEQA) obligations related to the switchyard.

#### Methodology and Assumptions

Baseline information pertaining to aesthetics was obtained through a site visit and a review of the Final EIR for the Jacumba Solar Energy Project (County of San Diego 2016a). The following discussion summarizes the methodology and assumptions pertaining to the analysis.

Locations in the Proposed Project viewshed from which views of the Proposed Project would be available were identified on a satellite and aerial photography program (i.e., Google Earth) prior to the initial site visit. Site visits were conducted in fall 2018, winter 2018, and winter and spring 2019. Winds were mild, and local conditions were generally sunny and clear, except for the site



visit conducted in February 2019 during which local conditions were mostly cloudy. Digital photographs of the Project site and surrounding area were taken with a location-services-enabled iPhone 6s to document the characteristics of the Project site and surrounding area. Photographs were also taken to capture views from public vantage points to the Project site and for baseline images for Proposed Project visual simulations. Photographs were taken from multiple locations on the Project site, public roads in the surrounding area, Jacumba Community Park, an undeveloped residential lot west of the Project site, State Park lands west of the Project site, the mesa below Table Mountain, and Airport Mesa.

Nine key views were selected from which to evaluate effects to existing views and visual change resulting from implementation of the Proposed Project. The locations of selected key views are shown in Figure 2.1-8A, Key Views. The key views are representative of views to the Project site available from public roads, residential areas, and recreational lands in the Project area. Further and consistent with County requirements, the key view locations were selected because these would clearly display the visual effects of the Proposed Project.

Except for Key View 6, key views were not established on private property (neither CEQA nor County Guidelines specifically protect private views). However, the selected key views are representative of the viewing angles and distances available to viewer groups in the Jacumba area, including residents.

### Visual Simulations

Photographs of the Project site taken from the key views were used to create 3D simulations of the Proposed Project. True-scale 3D models were rendered onto the photographs that were taken during the fall and winter 2018, and winter 2019 site visits from the key view locations.

Visual simulations were created to illustrate the anticipated visual change and characteristics associated with development and buildout of the Proposed Project. Using available topography maps or digital elevation maps, a 3D surface was created for the existing terrain and then imported into 3D Studio Max. This 3D surface was used to camera-match the background photos to the terrain model. 3D models were created for all proposed facilities that are visible from the selected key views. These 3D models were then merged into the 3D scene at their finished grade elevations. Lighting was added to the scene to match the time of day the photos were taken and to cast realistic shadows. Each view was rendered to a high-resolution image. The final product depicts a photorealistic before-and-after simulation. Upon completion of the visual simulations, the existing setting photographs were compared to the Proposed Project conditions to outline the potential impacts of the Proposed Project and determine the significance of anticipated visual change. Figure 2.1-8B shows the Conceptual Landscape Plan. Existing photographs and visual simulations from the identified Key Views are provided in Figures 2.1-9 through 2.1-17.

### ***2.1.3.1 Visual Character or Quality***

#### **Guidelines for the Determination of Significance**

For the purpose of this EIR, the County's Guidelines for Determining Significance, Report Format and Content Requirements – Visual Resources (County of San Diego 2007) was used to establish significance thresholds. As stated in the County guidelines, a significant impact to existing visual character or quality would occur if (i.e., Threshold 1):

- The project would introduce features that would detract from or contrast with the existing visual character and/or quality of a neighborhood, community, or localized area by conflicting with important visual elements or the quality of the area (such as theme, style, setbacks, density, size, massing, coverage, scale, color, architecture, building materials, etc.) or by being inconsistent with applicable design guidelines.

#### **Analysis**

##### **Proposed Project**

According to the Mountain Empire Subregional Plan, the Jacumba Subregional Group Area is unique both in natural and created settings, which includes hot springs and a desert environment (County of San Diego 2016b). Although the existing character of the Project site and surrounding area is largely defined by undeveloped desert landscape, including flat valley terrain, rugged and rocky mountains, rolling hills, and scrub vegetation, the surrounding area also includes the community of Jacumba Hot Springs, I-8, Old Highway 80 and local roads, high-voltage transmission lines, and commercial development at I-8. More specifically, high-voltage transmission lines traverse the Project site from east to west and are a constant presence in existing views from I-8, Carrizo Gorge, and Old Highway 80. Residential development and limited commercial development is located to the immediate west of the Project site within Jacumba Hot Springs. A few single-family homes are also scattered to the east along Old Highway 80. Two gas stations are located adjacent to the Project site and I-8.

Of the visual elements included in Threshold 1, theme, style, size, massing, scale, color building materials, and setbacks are particularly relevant to the solar facility and substation. Density, coverage, and architecture are not particularly applicable to the Project site or the primary visual impacts associated with the Proposed Project. In addition, the Mountain Empire Subregional Plan does not include design guidelines, and therefore, consistency with design guidelines is not included below.

## Theme and Style

Construction and operation of the solar energy generation and storage facility and associated access roads would occur on approximately 643 acres within the 1,357-acre Project site. The solar facility components would include 300,000 PV modules mounted on support structures (single-axis solar trackers). The solar panels would be approximately 12 feet high each as measured from the upper panel edge to the adjacent ground level. Other components would include an underground collection line system, 25 inverter/transformer platforms, an on-site collector substation, a switchyard, and two 138 kV overhead gen-tie lines. The Proposed Project would also include a 90 MW battery energy storage system. The battery storage system would include 75 steel containers (approximately 55 feet long by 10 feet high by 19 feet wide) installed next to the inverter/transformer platforms at 25 locations within the solar facility.

The theme and style of the visual character of the Project area, including the Project site, is defined by a largely undeveloped desert landscape marked by sandy to rocky hills, low-lying rugged shrubs, and rugged mountains. Landforms on the Project site range from mountain terrain (i.e., Round Mountain; outside of the impact area) and east-facing slopes, to vegetated floodplains, low rolling hills in the northern portion, and a wide hill in the eastern portion. In addition, the traditional pattern of development in the larger area is characterized by single-family residences within the center of Jacumba and slightly larger lots and scattered structures on the periphery of the community. High-voltage transmission lines traverse the Project site and adjacent properties to the east and west.

The solar facility and substation would not replicate the traditional theme and style of the Jacumba area characterized by single-family residences, large and small ranches, and natural topography and terrain. The introduction of the solar facility adjacent to a small rural town would result in a noticeable change in the visual character of the community. The anticipated visual effects associated with Proposed Project construction is discussed in Section 2.1.3.2, Valued Visual Character or Image of Neighborhood or Community. In addition, the anticipated effects of the Proposed Project are shown in visual simulations from Key Views 1 through 9 as depicted in Figures 2.1-9 through 2.1-17. Although existing high voltage transmission lines and distant wind development in Mexico are currently visible, the solar facility and substation would contrast strongly with the existing theme and style of the landscape and predominant development (i.e., residential) in the Jacumba area. In addition, development of the Project site as proposed would result in a permanent and prominent change in the visual theme and style of the community. Impacts to theme and style would be adverse.

## Size, Scale, and Massing

The proposed solar panels would feature a maximum panel edge height of approximately 12 feet above ground surface. Although the height of the panels would be less than the typical height of a single-family residence in the Jacumba community, additional Proposed Project components, including the collector substation, 138 kV overhead slack span transmission line, and 138 kV loop-in gen-tie lines, would exceed the vertical scale of nearby residential development. For example, tall components associated with the collector substation, including a 138 kV dead-end structure and switching gear, and support poles for the slack span transmission line, would be 65 feet high (approximately). These components would be distant but visible from I-8 near the Carrizo Gorge Road exit. In addition, up to five 70- to 115-foot-high (approximately) steel poles would be installed to support the proposed 138 kV loop-in gen-tie lines and would be visible to motorists on Carrizo Gorge Road. For a brief duration, these elements would also be visible to I-8 motorists. Although the taller components of the Proposed Project would have limited visibility from residences in Jacumba Hot Springs (the proposed facilities and lines would be located more than 1 mile northeast of Laguna Street and nearby residences), the size and scale of taller Proposed Project components would be dissimilar to that of Jacumba area residential development and predominantly low vegetation across the Project site.

Although existing transmission line infrastructure displays comparable vertical size, scale, and massing as taller Proposed Project components, the wide distribution of solar panels across the Project site would strongly contrast with the size and scale of existing nearby development. More specifically, repeating rows and racks of proposed solar panels would be distributed across a large, 643-acre area that previously supported dairy farming and ranching uses. The broad distribution of proposed solar panels would be particularly noticeable in available views from I-8 at Key View 1 (Figure 2.1-9) and from elevated vantage points on State Park lands to the immediate west of the Project site (Key View 7 [Figure 2.1-15]), Airport Mesa (see Key View 8 [Figure 2.1-16]), and from the mesa south of Table Mountain (see Key View 9 [Figure 2.1-17]). Traditional development patterns associated with the community of Jacumba Hot Springs are also visible from State Park Lands (see Key View 7 [Figure 2.1-15]).

As viewed from Old Highway 80, the upper portion of the solar panels would be visible above the slatted fencing which would be installed to screen the solar facility (see Key View 3 [Figure 2.1-11] and Key View 5 [Figure 2.1-13]). These key views also show the landscaping that would be installed as screening along the Project site frontage of Old Highway 80. Landscaping and slatted fencing would also be implemented along the western Project site boundary that adjoins Jacumba Community Park and residential properties (see Key View 4 [Figure 2.1-12] and Key View 6 [Figure 2.1-14]).

On its western boundary, a portion of the Project site is located adjacent to small-lot residential properties featuring modest, single-family residences and mobile homes. With the exception of scattered residences south of Old Highway 80 and east of the Project site, the majority of development in Jacumba Hot Springs is concentrated on a less than 100-acre area located north of Old Highway 80, east of Railroad Street, and west of Laguna Street. The existing Jacumba Solar facility is located to the east; however, this facility is blocked from view of the community and has limited visibility from Old Highway 80. As such, the horizontal scale and massing of the Proposed Project would conflict with the established scale and massing of existing development in the Jacumba Hot Springs community.

### Color and Building Materials

Earth-tone colors are prevalent on the Project site and consist of green to greyish grasses, dark green to grey shrubs, and light tans displayed by access roads, hills, drainages, and patches of exposed soils. The abandoned ranch structures are typically white or metallic grey. Vegetation on nearby rural residential properties tends to display a similar earth-tone palette, but these areas may include larger expanses of lightly colored tones due to vegetation clearance near structures. Colors displayed by existing on-site elements, including terrain and vegetation, are illustrated in the photographs of existing conditions from Key Views 1 through 9 (see Figures 2.1-9 through 2.1-17).

Proposed solar panels would be uniformly dark in color. As demonstrated in the visual simulations prepared for the Proposed Project, the dark color of solar panels would be visible to varying degrees from public vantage points in the surrounding areas (see Key Views 1 through 9 [Figures 2.1-9 through 2.1-17]). Other proposed components on the Project site would include the on-site substation, gen-tie lines supported by 70- to 115-foot-high poles, an overhead slack line supported by 65-foot-high poles, inverters and a battery energy storage system composed of 75 steel containers (55 feet long by 10 feet high by 19 feet wide each). In general, these facilities would be metallic grey in color and would be constructed of steel.

Although dark grasses and shrubs are seasonally present throughout the Project site, the introduction of up to 300,000 uniformly dark solar panels would create strong color contrast with the general earth tones displayed by vegetation on the Project site and in the surrounding area. Further, the wide distribution of dark tones of proposed solar panels would conflict with the typically white or off-white color of residential and commercial buildings in Jacumba Hot Springs, and with abandoned structures on the Project site. Also, unlike the on-site substation that would be distant from public viewing locations, inverters and battery energy storage system containers would be scattered between rows of solar panels, including along the perimeter of solar development. If these components are painted with light colors, they would contrast with dark solar panels. Due to the wide distribution of dark solar panels across the site and the colors expressed by prominent perimeter screening elements and other potential color contrasts described

above, Proposed Project components would conflict with the dominant colors displayed by terrain and vegetation in the landscape and by existing residential and commercial development in Jacumba Hot Springs.

### Setbacks

Due to the proximity of rural residences and public roads and the visual prominence of Proposed Project components, substantial contrasts with existing visual character would occur. Along the western Proposed Project boundary, solar panels are proposed near occupied rural residences.

At the closest location (i.e., near the driveway to be constructed off Carrizo Gorge Road to provide access to panels located west of the road), proposed solar panels would be set back approximately 60 feet from the Carrizo Gorge Road ROW. At this location, solar panels would be located beyond a perimeter fence and a 24-foot-wide site perimeter access road. East of the road, the nearest solar panels within an isolated T-shaped tract of the Proposed Project would be similarly set back approximately 67 feet from the Carrizo Gorge Road ROW.

As shown in Figure 1-2, Project Components, in Chapter 1 of this EIR, and Figure 2.1-8B, the Project site parallels Old Highway 80 to the south and north generally from Carrizo Gorge Road west to the community of Jacumba Hot Springs. Solar panel set backs from the highway ROW would vary, ranging from a shorter distance of approximately 45 feet from the southerly ROW on the south to a longer distance of approximately 85 feet from the northerly ROW.

The western Project site boundary parallels residential property lines for approximately 0.25 miles north of Old Highway 80. The nearest solar panels would be set back approximately 75 feet from the closest residential property line.

Lastly, the western Project site boundary parallels Jacumba Community Park for approximately 0.18 miles south of Old Highway 80. The setback of the solar panels from the park property line would vary, ranging from approximately 48 feet to 65 feet.

### *Threshold 1 – Assessment Summary*

As detailed above, the height of the proposed panels (up to 12 feet high) would be consistent with the scale of the typical residential development in the adjacent community of Jacumba. In addition, the proposed scale of prominent collector substation components (including the 138 kV dead end structure that is approximately 65 feet high), and switchyard loop-in gen-tie line poles (approximately 70 to 115 feet high each) would be consistent with or shorter than existing electrical transmission poles and towers in the landscape. However, the wide distribution of repeating rows of solar panels on the approximately 643-acre site would create noticeable horizontal scale and massing contrasts with adjacent areas of residential development. In addition,

installation of thousands of uniformly dark solar panels in an area that consists mostly of earth tones, modest and lightly colored residential structures, and undeveloped lands would strongly contrast with the established theme and style of the Jacumba area. While not visually prominent in comparison to solar panels, inverters, battery energy, and gen-tie lines may also create noticeable color contrasts when viewed against the background of thousands of uniformly dark solar panels. Thus, the color of proposed solar panels would not be consistent with the predominant colors displayed by features in the existing landscape and internal color contrasts would further degrade the existing visual environment. Although the existing Jacumba Solar development is located further to the east of the Project site, this facility is located outside of the rural village boundary and is fully screened by intervening terrain from viewers in Jacumba Hot Springs. Unlike the Proposed Project, the Jacumba Solar facility also has limited visibility from Old Highway 80. Therefore, the characteristics of the Proposed Project would conflict and be inconsistent with the undeveloped, desert landscape and small town character of Jacumba, and impacts would be **potentially significant (Impact AE-1)**.

### *Switchyard*

The switchyard would be constructed on undeveloped desert land in the northeastern portion of the Project site. The proposed switchyard would be sited adjacent to the proposed substation and would be bordered by undeveloped, previously disturbed land to the east, north, and west. A visually prominent hill is located south of the switchyard site. The nearest developed uses consist of two gas stations off Carrizo Gorge Road that are approximately 1 mile north. Scattered rural residences are located within 1 mile of the switchyard site, but views to the site from these areas are blocked by a hill. Residences in Jacumba Hot Springs are located more than 1.5 miles southwest, and due to distance, the switchyard would not be particularly visible.

The switchyard would not represent the traditional development theme and style of the Jacumba area. Although views of the switchyard and gen-tie lines from I-8 and Carrizo Gorge Road would be brief and visual contrasts would be muted by distance (see Key View 1[Figure 2.1-9]), both the nature of the development and the scale and massing of the approximately 140,000-square-foot facility would create moderately strong contrasts in the landscape. Although the existing 138 kV transmission line, Southwest Powerlink, and Sunrise Powerlink are adjacent to the switchyard, these transmission lines and the proposed switchyard would not replicate the traditional predominant theme and style of the Jacumba area.

Regarding color, the proposed switchyard and loop-in components would generally display a consistent metallic grey color and would be constructed of steel or similar metal. Switchyard and gen-tie line components would display colors consistent with those displayed by electrical and substation infrastructure in the immediate area. Still, metallic tones would contrast with the drab tones of vegetation and tans of desert terrain, and the concentration of these metallic components would be dissimilar to the linear distribution of nearby transmission lines.

In addition, the height of prominent switchyard components and gen-tie line structure would not be consistent with the scale of the typical residential and nearby gas station development in the Jacumba area. The proposed scale of prominent switchyard components (bus work, switches, and controls) and switchyard loop-in gen-tie line poles (approximately 70 to 115 feet high each) would be consistent with or shorter than existing electrical transmission poles and towers in the immediate area. Despite these consistencies with existing electrical infrastructure, the character of the proposed switchyard would detract from the character of the larger Jacumba area and would conflict with the established theme and style of the area that is predominantly associated with an undeveloped desert landscape, including flat valley terrain, rugged and rocky mountains, rolling hills, and scrub vegetation. Therefore, impacts would be **potentially significant (Impact AE-1)**.

### ***2.1.3.2 Valued Visual Character or Image of Neighborhood or Community***

#### **Guidelines for the Determination of Significance**

For the purpose of this EIR, the County's Guidelines for Determining Significance, Report Format and Content Requirements – Visual Resources (County of San Diego 2007) was used to establish significance thresholds. As stated in the County guidelines, a significant impact would result if:

- The project would result in the removal or substantial adverse change of one or more features that contribute to the valued visual character or image of the neighborhood, community, or localized area, including but not limited to landmarks (designated), trees, and rock outcroppings.

#### **Proposed Project**

There are no designated landmarks or historic resources present on the Project site. Further, the proposed impact area generally consists of flat terrain that was previously disturbed by agricultural operations. Prominent rock outcroppings are not present on the proposed development footprint. Trees are present on the Project site and are grouped in orderly east/west and north/south lines near the center of the Project site. Although these features are visible from Old Highway 80, they are proportionately minor features within the context of the 643-acre Project site. Although specific landmarks, historic resources, and rock outcroppings are not present on the Project site and trees are limited, the Project site does feature an undeveloped desert environment, with open views of the Jacumba Valley and surrounding mountainous areas.

The existing scenery of the Jacumba area would be substantially altered and affected during construction. Construction activities and the installation of fencing around the perimeter of the development footprint would result in the removal of 643 acres of currently vacant and primarily undeveloped lands from the local area. The construction phase of the Proposed Project would last approximately 13 months, and a workforce of up to 500 employees per day may be required during peak activities.



The physical effects of construction activities would alter the existing open character of the Project site. Roads and other previous disturbances have created visible lines and gaps across the Project site, but proposed grading and vegetation removal would create precise and geometric forms and lines. These new forms and lines would be noticeable and would contrast with adjacent areas of undisturbed vegetation. Following the clearance of vegetation and grading of the site, underground trenching work and installation of the proposed solar panels would occur. During this period, the Project site would begin to display an orderly appearance. Although order created by repeating rows of support racks and panels and straight roads would be somewhat compatible with the grid-like pattern of residential development in Jacumba, the Project site would contrast with the dynamic, open appearance of the existing site and of undeveloped terrain and native vegetation in the surrounding area.

Similarly, clearing, grading, and construction of the on-site collector substation would introduce straight and rectangular building pads and geometric vertical forms where none currently occurs on site. Available views to these facilities would generally be limited to motorists on I-8 and Carrizo Gorge Road. One 220-foot-long 138 kV overhead slack span transmission line (supported by poles approximately 65 feet high) is proposed and would connect the collector substation to the switchyard. The proposed overhead slack span transmission line would be located more than 0.50 miles away but would be visible to eastbound and westbound I-8 motorists over distances of approximately 0.25 miles and 0.21 miles, respectively. From Carrizo Gorge Road, the proposed slack span transmission line would be more than 0.25 miles away, but would be visible to southbound Carrizo Gorge Road motorists over an approximate distance of 0.52 miles. At 65 feet tall, proposed slack span transmission line poles would be substantially shorter than steel poles and towers of the existing 500 kV Southwest Powerlink, 500 kV Sunrise Powerlink, and 138 kV East County Substation transmission line (approximately 150 feet tall). These transmission lines traverse the Project site immediately north of the proposed switchyard.

Proposed solar panels would be visually prominent and experienced as the dominant features of the Proposed Project. Landscaping and slatted fencing would partially screen solar panels from view of motorists along Old Highway 80, Jacumba Community Park users, and nearby residents (see Key Views 3, 4, 5, and 6 [Figures 2.1-11 through 2.1-14]); however, the Proposed Project would substantially alter the currently open and unimpeded character of views across the Project site from these areas.

The existing undeveloped character of the Project site would also be altered by construction of less-prominent Proposed Project components. The inverter/transformer platforms and battery energy storage containers would generally be screened from public view. Grading and trenching associated with the underground electrical collection system would result in similar lines as the proposed internal access road (lines would be installed beneath roads). Inverter/transformer platforms and up to three storage containers (55 feet long by 10 feet high by 19 feet wide) would

be installed at 25 locations throughout the proposed solar facility site (total of 75 battery storage containers). Despite the height of the storage containers, these components would generally be set back from the perimeter of the solar facility and visually screened by solar panels located closer to viewers. For example, the nearest storage containers would be located approximately 410 feet from Carrizo Gorge Road, and rows of solar panels, a 24-foot-wide access road, and perimeter fencing would be installed between the storage containers and motorists. Storage containers would be located approximately 750 feet from Old Highway 80.

As proposed, the Proposed Project would result in an adverse visual change to the existing small-town character of the area and open characteristics of the site. Although agricultural operations on the Project site have not been active for years, the site is primarily undeveloped and displays open and unimpeded characteristics. Installation of the solar facility would substantially change existing visual quality and result in the adverse alteration of the open and unencumbered qualities of the Project site. As experienced from I-8, the proposed solar facility would substantially interrupt the existing open and unencumbered views across the Project site. For example, see the visual simulations prepared from Key View 1 (Figure 2.1-9), Key View 3 (Figure 2.1-11), and Key View 5 (Figure 2.1-13).

Visual simulations prepared from Key View 3 (Figure 2.1-11), Key View 4 (Figure 2.1-12), and Key View 5 (Figure 2.1-13) show the visibility of the Proposed Project along Old Highway 80 and from Jacumba Community Park. The visual simulation from Key View 6 (Figure 17) shows the visibility of the Proposed Project from adjacent residential properties in Jacumba Hot Springs. Under existing conditions, clear and open views across the Project site are available from Old Highway 80, the community park, and adjacent residential properties. With implementation of the Proposed Project, the currently unimpeded views would be substantially altered and shortened. As such, views of the Proposed Project by Old Highway 80 motorists, Jacumba Community Park users, and Jacumba Hot Springs residential properties adjacent to the Project site, would be substantially altered and the length of available views would be shortened.

The introduction of visually prominent Proposed Project components, including 300,000 PV modules, would substantially change the quality of existing views across the site. Further, the proposed solar facility development would conflict with the small-town character of the Jacumba area and the existing open and unencumbered visual characteristics of the Project site that are important elements. As such, Proposed Project's impacts would be **potentially significant (Impact AE-2)**.

### *Switchyard*

The proposed switchyard site encompasses undeveloped yet previously disturbed lands located approximately 0.60 miles south of I-8 and 0.25 miles west of Carrizo Gorge Road. On-site terrain gradually slopes from east to west, but the site is generally flat and is covered with tan-colored soils and scrubby shrubs. The site is also crossed by several dirt access roads. The site does not

contain landmarks, trees, or prominent rock outcroppings. Although development of the switchyard and gen-tie line would alter the existing character of the previously developed site, it is situated near the base of a prominent hill and visually screened from most public vantage points in the area, including Old Highway 80 and the Jacumba residential area. In addition, the proposed switchyard would not substantially shorten available views across Jacumba Valley. Still, the construction and operation of an approximately 140,000-square-foot switchyard surrounded by security fencing and housing a 138 kV insulated electrical bus, steel support structures and foundations, and a concentration of additional electrical equipment would adversely alter the valued open and unencumbered characteristics of the Jacumba area. Therefore, impacts would be **potentially significant (Impact AE-2)**.

### ***2.1.3.3 Focal or Panoramic Vistas***

#### **Guidelines for the Determination of Significance**

For the purpose of this EIR, the County's Guidelines for Determining Significance, Report Format and Content Requirements – Visual Resources (County of San Diego 2007) was used to establish significance thresholds. As stated in the County guidelines, a significant scenic vista impact would occur if:

- The project would substantially obstruct, interrupt, or detract from a valued focal and/or panoramic vista from:
  - a public road,
  - a trail within an adopted County or State trail system,
  - a scenic vista or highway, or
  - a recreational area.

Also, pursuant to Appendix G of the CEQA Guidelines:

In non-urbanized area, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point).

## Proposed Project

### *Public Roads*

#### *Interstate 8*

As discussed in Section 2.1.1.1, Project Site and Surrounding Area, views of the Project site are intermittently available from I-8 for approximately 1.2 miles. From eastbound I-8, the duration of available views to the Project site is brief, lasting less than 30 seconds as I-8 passes a low hill that blocks southward views and approaches the Carrizo Gorge Road off-ramp. The duration of available views to the Project site available to westbound I-8 motorists is longer, but views are non-continuous and are routinely interrupted by intervening median elements, including elevated road cut terrain, boulders, and vegetation.

Although the southward views offered to I-8 eastbound and westbound motorists near the Project site are occasionally broad and stretch to mountainous terrain in Mexico (see Key View 1, Figure 2.1-9), existing elements detectable in south-oriented views include the 500 kV Southwest Powerlink, 500 kV Sunrise Powerlink, and 138 kV transmission line. As shown in the existing conditions photograph from Key View 1 (see Figure 2.1-9), these facilities traverse the Project site and are visible from I-8. In addition to transmission facilities, southward views offered to eastbound motorists near the Project site include scattered development (i.e., gas station development and signage) and remnants of a quarried hill in the foreground (see Figure 2.1-9).

Despite the brief and intermittent nature of the views from I-8 and the present disturbance of the viewshed by existing electrical transmission infrastructure, the installation of the Proposed Project, including the introduction of up to 300,000 solar panels across the Project site would interrupt existing southward views across the Jacumba Valley landscape and alter the mostly undeveloped and open character of the site (see Key View 1 [Figure 2.1-9]). The visual effects of vegetation removal and the introduction of thousands of dark solar panels across approximately 643 acres of mostly undeveloped, flat terrain would be stark and would attract attention. As previously stated, I-8 is an eligible state scenic highway (and included on the County Scenic Highway System), which implies a heightened sensitivity to modifications along the corridor. As demonstrated in visual simulation from Key View 1 (see Figure 2.1-9), development of the Project site as a solar energy park would substantially detract from the available long view from I-8. As such, impacts would be **potentially significant (Impact AE-3)**.

#### *Old Highway 80*

Old Highway 80 transects the Project site from approximately Laguna Street to the Jacumba Airport driveway (0.95 miles). Along this segment of the highway, existing southward and northward views offered to motorists (and occupants) are unimpeded except for regularly spaced

wooden poles that support local electrical distribution lines. More specifically, southward views extend across the flat grass and scattered shrub-covered terrain to the international border fence and a rugged ridgeline in Mexico (see Key View 3 [Figure 2.1-11]). Northward views spread across the Project site and extend to local hills traversed by electrical transmission lines (and associated access roads) and mountain terrain, including Round Mountain and Mount Tule (see Key View 5 existing conditions [Figure 2.1-13]).

From eastbound Old Highway, Project site views are available over approximately 0.95 miles, which is the approximate length that the highway parallels the Project site boundary. From westbound Old Highway 80, view duration to the Project site is longer. In addition to the segment paralleling the Project site, views to portions of the northern and/or southern Project site are available starting approximately 0.8 miles east of Carrizo Gorge Road. From this segment of westbound Old Highway 80, views to the Project site are partially screened by vegetation adjacent to the highway and by the large hill situated west of the Carrizo Gorge Road/Old Highway 80 intersection and east of the Project site. In total, the Project site is visible to westbound motorists on Old Highway 80 for a discontinuous 2.25 miles. According to the San Diego Association of Governments, average daily traffic on Old Highway 80 near the Project site is approximately 500 vehicles (SANDAG 2019). Lastly, Old Highway 80 is included on the County's Scenic Highway System.

As shown from Key View 3 (see Figure 2.1-11), southeasterly views from eastbound Old Highway 80 are drawn to the rugged ridgeline of mountain terrain beyond the international border fence. Except for the border fence that is constant in the Old Highway 80 landscape, existing views across the Project site are open and unencumbered. The Proposed Project would include installation of solar panels and other solar facility components, and perimeter fencing south of Old Highway 80 for a distance of approximately 0.83 miles. As shown in the visual simulation from Key View 3 (see Figure 2.1-11), the solar panel setbacks from the highway ROW would vary, ranging from a shorter distance of approximately 45 feet from the southerly ROW on the south to a longer distance of approximately 85 feet from the northerly ROW.

As shown from Key View 3 (see Figure 2.1-11), the Proposed Project would alter the existing quality of views from eastbound Old Highway 80 across the Project site. Although the dark, rugged ridgelines of distant topography would remain visible, the continuity of views to these prominent landscape elements would be severed by Proposed Project components introduced to the foreground of Old Highway 80. For example, currently open views to the south and southeast would be replaced with routinely broken and intermittently blocked views. Although not depicted in Figure 2.1-11, northerly views from eastbound Old Highway 80 across the Project site and toward I-8 and prominent topography, including Gray Mountain (located approximately 2.1 miles away), would similarly be altered by implementation of the Proposed Project.

For westbound motorists (and occupants), views in the foreground would be interrupted by Proposed Project components as shown in the visual simulation from Key View 5 (see Figure 2.1-13). Existing views are occasionally long, stretching to Mount Tule (approximately 6.5 miles away). Solar panels would be set back approximately 59 feet to 85 feet from the highway ROW adjacent to the westbound travel lane. North of the highway, the Proposed Project components would parallel the westbound travel lane for approximately 0.80 miles.

Due to their interesting form and vertical prominence, Round Mountain, Mount Tule, and Gray Mountain are focal features in northward views along the Proposed Project frontage of Old Highway 80. Both Mount Tule and Round Mountain are visible from the westbound travel lane of Old Highway 80. Although views of Round Mountain and other higher terrain would be visible above the tops of the solar panels and the fencing that would be installed along the perimeter of the solar facility, implementation of the Proposed Project, and specifically the introduction of thousands of solar panels, would substantially alter the existing character of the view across the Project site.

As described above, solar panels would parallel Old Highway 80 and would substantially alter the existing quality of views available to highway motorists and passengers. Numerous racks of solar panels would be aligned perpendicular to Old Highway 80, and although solar panels would be set back at least 75 feet from the paved extents of the highway, their wide distribution across relatively flat and open desert terrain would reduce existing visual quality and create strong contrast with existing conditions. Therefore, due to the wide distribution of solar panels across the site and related alteration of existing visual quality as experienced from eastbound and westbound Old Highway 80, including occasionally obscured views to mountainous terrain in the area, the Proposed Project would substantially obstruct, interrupt, or detract from a valued focal and/or panoramic vista. Impacts would be **potentially significant (Impact AE-4)**.

### *Carrizo Gorge Road*

In 2015, daily traffic volumes on Carrizo Gorge Road between Old Highway 80 and I-8 was approximately 300 vehicles (SANDAG 2019). Because the Project site abuts Carrizo Gorge Road, views to the Project site are available to motorists. Carrizo Gorge Road is a two-lane, light collector, paved and dirt road that generally provides local access between Old Highway 80 and I-8. A segment of Carrizo Gorge Road also extends to the northwest from the Carrizo Gorge Road/I-8 on-ramps intersection near the existing gas stations. From this location, the road is maintained by the County generally to the I-8 crossing. North of I-8, Carrizo Gorge Road becomes a privately maintained road and provides access to the private De Anza Springs Resort located north of I-8. Carrizo Gorge Road parallels the Project site for approximately 1.8 miles; however, development areas do not encompass the entirety of the Project site. As such, views to areas proposed for solar facility development are available over a discontinuous, approximately 1.25-mile segment of the road.

A representative view to the Project site from Carrizo Gorge Road was established at Key View 2 (Figure 2.1-10). Key View 2 is located on a segment of Carrizo Gorge Road that does not parallel the Project site and is located approximately 0.4 miles south of the nearest area proposed for solar development. From Key View 2 (see Figure 2.1-10), solar panels of the Proposed Project would be located approximately 0.4 miles away, and the hard line displayed by dark solar panels would stand out when experienced alongside the local terrain and vegetation. The Key View 2 landscape contains scenic features (i.e., tan and boulder covered Gray Mountain north of I-8 and darker Mount Tule to the northwest); however, the low angle of the view, presence of a prominent hill to the west (not visible in Figure 2.1-10), and visible mountains limits the panoramic qualities of the view. The solar panels would display a rectangular and relatively low-profile form, and although the dark color of these elements would create noticeable visual contrast, the quality of existing views to Gray Mountain and Mount Tule would be weakly affected at Key View 2. In addition, Proposed Project components would not block views or substantially interrupt views to prominent topographical features.

Where the solar facility would parallel Carrizo Gorge Road, existing views of the Project site would be altered by the Proposed Project components. However, motorists would experience these immediate foreground views over a distance of approximately 600 feet. Despite the proximity of Proposed Project components to the road (proposed solar panels would be set back approximately 75 feet from the paved extents of Carrizo Gorge Road), Gray Mountain and Mount Tule would remain visible. In addition, Carrizo Gorge Road is not included in the County Scenic Highway System and is not designated scenic by the state. Focal views to scenic features from Carrizo Gorge Road would not be substantially blocked, interrupted, or otherwise degraded by implementation of the Proposed Project. Therefore, due to the short distance over which solar development areas would parallel Carrizo Gorge Road, the brief duration of views to solar development within the foreground, the low number of daily vehicles on Carrizo Gorge Road, and the lack of scenic designation, impacts to focal or panoramic vistas would be **less than significant**.

## Trails

As discussed in Section 2.1.1, Existing Conditions, there are no segments of an adopted County or state trail system in the Jacumba area. Further, no segments of trails within the Boulevard Community Trails and Pathways Plan (County of San Diego 2005) offer views to the Project site or the Jacumba Valley area, and the community of Jacumba does not have a Community Trails and Pathways Plan. Since views to the Proposed Project would not be available to users of an adopted County or state trail system, **no impacts** to a valued focal and/or panoramic vista from a trail within an adopted County or state trail system would occur.

## Scenic Highways

There are no official state designated highways in the viewshed of the Proposed Project. One eligible state scenic highway, I-8 (also included in the County Scenic Highway System), is located in the Project area (Caltrans 2017). In addition, Old Highway 80, a two-lane road included in the County Scenic Highway System, bisects the Project site (County of San Diego 2011c).

Impacts to focal and panoramic vistas from I-8 and Old Highway 80, both included in the County Scenic Highway System, are described under the Public Roads heading, above.

## Recreation Areas

Recreation areas within the Proposed Project viewshed include local, state, and federal lands. Specifically these include Jacumba Community Park, which is located immediately adjacent to the southern portion of the Project site. State lands include Anza Borrego Desert SP, which is located to the west and northwest of the Project site. Federal lands include BLM-managed lands encompassing the summit of Round Mountain (and its west- and south-facing slopes), Airport Mesa RMZ, Table Mountain RMZ, and the Jacumba Mountain Wilderness. Both the Airport Mesa RMZ and Jacumba Mountain Wilderness are located east of the Project site, and the Table Mountain RMZ is located to the northeast.

### *Location/County Recreational Areas*

#### ***Jacumba Community Park***

Jacumba Community Park is located south of Old Highway 80 and immediately west of the southern portion of the Project site. As shown in the existing conditions photograph from Key View 4 (see Figure 2.1-12), the existing eastward view from the park looks across the undeveloped and open views in the southern portion of the Project site. With implementation of the Proposed Project, solar panels would be installed south of Old Highway 80 and east of the community park. Solar panels would be set back approximately 40 feet from the eastern boundary of the park property, and although active recreational facilities (i.e., basketball court and baseball/diamond) are located in the center and southwestern corner of the park property, solar panels would be visible from locations throughout Jacumba Community Park. Specifically, the dark, rectangular form and horizontal line of proposed solar panels would be visible and would stretch over the Project site and toward the Jacumba Airport and Airport Mesa, as shown in the visual simulation from Key View 4 (see Figure 2.1-12). Implementation of the Proposed Project would substantially alter the existing open character of the Proposed Project and the unimpeded quality and intactness of the existing view. Therefore, impacts to focal or panoramic vistas from Jacumba Community Park would be **potentially significant (Impact AE-5)**.



## *State Recreational Areas*

### *Anza-Borrego Desert State Park Lands*

Although most of the Anza-Borrego Desert SP land in the surrounding area is located north of I-8, discontinuous tracts of State Parks land are included within the current boundary of the State Park northwest of the Project site. In addition, lands recently acquired by the state for inclusion in the State Park are located west of the Project site from generally the base of Round Mountain south to the San Diego and Arizona Eastern Railway alignment. As shown in Figure 2.1-7, north of I-8 the Proposed Project viewshed extends to sections of the Jacumba Mountain Wilderness Area within the Anza-Borrego Desert SP. No designated trails, points of interest, or campgrounds are currently located on the State Parks lands nearest to the Project site. As such, these remote areas are assumed to currently receive very little public recreation use. In regards to the State Park lands located to the immediate west of the Project site, proposed solar panels would be relatively close (i.e., within 0.30 miles), and the lack of intervening topography creates opportunities for clear and unimpeded views to the central and south portions of the Project site. In addition, most State Parks lands would be located more than 1 mile from solar panels on the Project site, and due to intervening mountainous terrain, the partially blocked views to the Project site would not substantially obstruct or interrupt a valued focal or panoramic.

Key View 7 (see Figure 2.1-15) shows existing views from the mesa encompassing Anza-Borrego Desert SP lands to the immediate west of the Project site. From the eastern edge of these lands, the central and southern portions the Project site are visible and display an open, undeveloped character. With implementation of the Proposed Project, contrasts would be visually prominent and strong as shown in the visual simulation from Key View 7 (see Figure 2.1-15). The installation of repeating rows of dark, rectangular solar panels would create form and color contrast across the visible extent of the Project site. Further, the installation of thousands of solar panels would produce a repetitive, orderly quality that is not currently present on the open and undeveloped Project site. Although the State Parks lands to the west are located 200 feet or greater in elevation than the Project site, and Proposed Project components would not substantially block or shorten the available long view, the Proposed Project would display a large horizontal scale and footprint that would cover a wide area of visible valley floor as shown from Key View 7 (see Figure 2.1-15). In addition, solar panels and other visible Proposed Project components would substantially interrupt and detract from existing views. As such, impacts to panoramic vistas available from State Parks lands west of the Project site would be **potentially significant (Impact AE-6)**.

## *Federal Recreational Areas*

### *Round Mountain*

The western portion of Round Mountain is located on BLM-managed lands. Round Mountain is assumed to receive sporadic use by individual hikers and small, informal hiking groups.

Due to its elevated vantage points and the general lack of intervening topography, the entirety of the solar facility would be visible from the summit of Round Mountain. Ground disturbance and activities during construction would be apparent, and once constructed, the distribution of thousands of solar panels and the grid-like layout of access roads and panels would be clear and prominent across the flat valley floor. As previously stated, views from the summit and southern slope of Round Mountain are long and broad, stretching to the Jacumba Mountains to the east and the southerly extension of this range into Mexico.

The proximity of the Project site and visibility of the entire development footprint would substantially interrupt the long view available from Round Mountain. The solar facility would be a focal point in the landscape and would detract from the available expansive view to the southeast and south. As such, impacts would be **potentially significant (Impact AE-7)**.

### *Airport Mesa RMZ*

Airport Mesa is managed by BLM for its rural recreational qualities, but the lone access road to the summit is managed by U.S. Customs and Border Protection. In addition, the access road and summit are regularly used by U.S. Customs and Border Protection agents to conduct patrols of the area. No staging or parking areas for hikers or other trail-based recreationists are provided near the Airport Mesa landform, and no visible trails were identified on the east-, north-, or west-facing slopes. Therefore, limited recreational use of Airport Mesa occurs. However, because Airport Mesa provides opportunities for long views and has not formally been closed by the BLM for recreational use, effects to existing views from Airport Mesa are considered in this report.

As shown in the existing conditions photograph from Key View 8 (see Figure 2.1-16), Airport Mesa offers a westward view toward the Jacumba Valley and community of Jacumba Hot Springs. As shown in Figure 2.1-16, the existing westward view is long and includes mesas and several hills and valleys west of Jacumba, and the generally horizontal horizon of the Tecate Divide. With implementation of the Proposed Project, contrasts in color and line would be strong as viewed from Key View 8, and the current character of the Project site would be fundamentally altered by the solar facility. Although the view would remain long and broad, and surrounding hills and mountains would remain unaltered, development of the solar facility would interrupt and detract from the available view. The Proposed Project would display flat forms somewhat consistent with the flat valley floor, but the existing visual pattern of flat, undeveloped valley terrain and

mountains would be visibly altered by dark rectangular forms separated by the thin, tan lines displayed by access roads. With maximum exposure to the Proposed Project components from the elevated vantage point at Key View 8, the large horizontal scale and footprint of the Proposed Project would be visible and would substantially interrupt and detract from the available long view. As such, impacts to a focal or panoramic vista from Airport Mesa would be **potentially significant (Impact AE-8)**.

#### *Table Mountain RMZ*

As depicted in Figure 2.1-7, the viewshed of the Proposed Project would extend to portions of Table Mountain and the more accessible mesa to the south. Both areas are located on BLM-administered lands and are accessible via narrow trails. Also, both receive limited use from the local Jacumba Hikers and Walkers group, and sporadic use from individual hikers and small hiking groups.

Key View 9 was established on the mesa located south of Table Mountain and offers southwestward views toward the Jacumba Valley. In addition to the mesa, Key View 9 is representative of the available view from the summit of Table Mountain. As shown in the existing conditions photograph taken from Key View 9 (see Figure 2.1-17), the Project site is visible from the mesa south of Table Mountain, and therefore, views to the Proposed Project components would be available to an assumed limited number of hikers accessing the elevated vantage point. The nearest solar panels on the Project site would be located more than 1.5 miles away from viewers at Key View 9, and except for locations in the north and south, the majority of proposed solar panels installed across the Project site would be visible. From the mesa, the Proposed Project would primarily be viewed as a flat and geometric expanse of dark color on the valley floor. Although the details of proposed solar panels and the grid-like layout of the Proposed Project would be indistinct or difficult to detect, and Proposed Project components would not block visually prominent terrain from view, the concentration of dark color and geometric form of the developed Project site would interrupt the available open, unencumbered view to the southwest, and would detract from the panoramic vista. Therefore, impacts would be **potentially significant (Impact AE-9)**.

#### *Jacumba Wilderness*

Accessible trails offering westward views to the Jacumba Valley and Project site are located more than 3 miles to the east. Apart from peaks and west-facing slopes, the occurrence of available westward views to the Project site is irregular, and motorists must typically perform some overland scrambling to access these views. Given these factors and the remote location of the Jacumba Wilderness and its associated network of roads, the number of users of the Jacumba Wilderness as a recreational resource is very low.

Where long westward views are available, the southern portion of the Project site is entirely blocked from view by Airport Mesa. This elevated landform is situated between the Jacumba Wilderness and the Project site and is a limiting factor in views. In addition, a portion of the Project site is blocked from view by the prominent hill located west of the Old Highway 80/Carrizo Gorge Road intersection. As viewed from the Jacumba Wilderness, the details of components on the Project site (primarily solar panels) would be indistinct, yet color contrast would be detectable. Still, this contrast would appear low in the landscape and would be generally viewed as a thin, horizontal feature. Visible yet distant Proposed Project components would not result in view blockage, and due to distance and the partially blocked view to the Project site, detectable contrast would neither substantially interrupt nor detract from the available view. Therefore, as viewed from the BLM-administered Jacumba Wilderness, impacts to focal or panoramic vistas would be **less than significant**.

### *Switchyard*

#### *Public Roads*

#### *Interstate 8*

The proposed switchyard site is located approximately 0.6 miles from the eastbound I-8, and once constructed, the facility would be visible to interstate motorists. As with the other elements of the Proposed Project, views to the switchyard site offered to eastbound I-8 motorists would be brief, lasting approximately seconds as the interstate passes a low hill that blocks southward views and approaches the Carrizo Gorge Road off-ramp. Duration view exposure to westbound I-8 motorists would be longer, and the proposed switchyard would be in the foreground for approximately 13 seconds. A photosimulation of the Proposed Project as experienced from I-8 near the Carrizo Gorge Road exit is included as Key View 1 (see Figure 2.1-9). Although less noticeable than proposed solar panels and ground disturbance within the Proposed Project fence line, ancillary Proposed Project components, including the switchyard, would be visible from the elevated vantage point. As shown in Figure 2.1-9, vertical racks and bays, and up to five 70- to 115-foot-high support poles of the short gen-tie lines, would be distant but detectable in southerly views from I-8 near Carrizo Gorge Road. In addition to distance, the presence of a hill to the immediate south of the switchyard would reduce the visual prominence of the switchyard as viewed from I-8. Similarly, the presence of the hill and comparatively low vertical profile of switchyard components would avoid the potential for the facility to be silhouetted against the sky. From I-8, the visual effects of the switchyard would be visually subordinate to those of the Proposed Project and may be overlooked by interstate motorists. Due to distance between viewers and components, and the location of the facility in the landscape as viewed from I-8, the proposed switchyard would result in **less than significant impacts** to a focal or panoramic vista from I-8.

### *Old Highway 80*

The switchyard site is located approximately 0.7 miles from Old Highway 80. From westbound Old Highway 80, views to the switchyard site are generally blocked from view by terrain, including the mounded hill located west of Carrizo Gorge Road and north of the highway. As westbound highway motorists approach Carrizo Gorge Road, views toward the site narrow and view blockage associated with the hill increases. At Carrizo Gorge Road, northwestward views offered to westbound Old Highway 80 motorists are limited to a foreground distance due to the rising terrain of the hill.

East of Laguna Street, northeasterly views across the Project site available to eastbound Old Highway 80 motorists are generally unimpeded. Specifically, motorists are offered views that generally stretch to the switchyard site. However, upon implementation of the Proposed Project, the majority of equipment installed at or associated with the proposed switchyard would be screened from view by the slatted perimeter fencing and landscape screens that would be installed during construction of the Proposed Project and maintained during Proposed Project operations. Motorists would be offered partially obstructed views to 70- to 115-foot-high gen-tie line support poles; however, these new poles would be located more than 1 mile away and viewed in combination with visually prominent poles and towers of the Southwest Powerlink and Sunrise Powerlink transmission lines. Due to the prominence of other intervening Proposed Project components, distance, and the presence of visually prominent transmission line towers and poles, the proposed switchyard would not substantially obstruct, interrupt, or detract from existing views from Old Highway 80. As such, impacts would be **less than significant**.

### *Carrizo Gorge Road*

Northbound motorists on Carrizo Gorge Road would have limited view exposure to the proposed switchyard. Due to intervening terrain generally located west of the Old Highway 80/Carrizo Gorge Road intersection, views to the switchyard would not be available to northbound Carrizo Gorge Road motorists. From southbound Carrizo Gorge Road, construction and operation of the switchyard would be partially blocked by intervening desert shrubs and occasional trees, and would be somewhat obscured by proposed perimeter fencing. Where visible, the switchyard would be experienced in concert with existing towers and poles of regional electrical lines, and would be revealed to motorists after passing proposed solar panels that would be in the foreground of Carrizo Gorge Road. Although the switchyard would be more visually distinct from Carrizo Gorge Road as compared to from I-8, the facility would remain visually subordinate to the proposed PV modules. In addition, existing views across the JVR Energy Park site from southbound Carrizo Gorge Road that would include the switchyard are not particularly panoramic due to the presence of prominent hills. Further, as viewed from Carrizo Gorge Road, the proposed switchyard would not block a focal feature from view and would not substantially interrupt or detract from a view to

a prominent focal feature. As such, the proposed switchyard would not obstruct or substantially interrupt or detract from a valued focal vista from Carrizo Gorge Road, and impacts would be **less than significant**.

### County or State Trail System

There are no segments of an adopted County or state trail system in the Jacumba area, and no segments of trails within the Boulevard Community Trails and Pathways Plan that offer views to the switchyard site (County of San Diego 2005). In addition, the community of Jacumba does not have a Community Trails and Pathways Plan. Since views to the switchyard site would not be available to users of an adopted County or state trail system, **no impacts** to a valued focal and/or panoramic vista from a trail within an adopted County or state trail system would occur.

### Recreation Areas

#### *Local/County Recreational Areas*

##### *Jacumba Community Park*

Except for 70- to 115-foot-high gen-tie line poles, the proposed switchyard would be blocked from view of Jacumba Community Park users. Proposed gen-tie line poles may be visible from the park, but poles would be located more than 1.25 miles away and would appear relatively low in the landscape. In addition, the proposed poles would be viewed in context of existing 150-foot-tall steel lattice towers and tubular steel poles that support the Southwest Powerlink and Sunrise Powerlink (both 500 kV transmission lines), and the East County Substation 138 kV transmission line. Due to distance and because switchyard components would generally be blocked from view and would not substantially interrupt or detract from the available views, impacts to focal or panoramic vistas from Jacumba Community Park would be **less than significant**.

#### *State Recreation Areas*

##### *Anza-Borrego Desert State Park*

The proposed switchyard and associated support poles would be visible from nearby state recreational areas, including State Parks lands adjacent to the Project site that are within the Anza-Borrego Desert SP. State recreational areas and their proximity to the Project site (the switchyard and gen-tie line poles are located within the Proposed Project boundary) are depicted in Figure 2.1-7. As stated above for the JVR Energy Park Project, no trails, points of interest, or campgrounds are located on Anza-Borrego Desert SP lands nearest to the switchyard site, and as such, nearby Anza-Borrego Desert SP lands are assumed to receive relatively low use by the public.

The proposed switchyard and support poles would be visible from prominent locations in the southern area of Anza-Borrego Desert SP, such as mountainous terrain east of Goat Canyon. In addition, the switchyard and gen-tie line poles would be visible from elevated vantage points on State Park lands to the immediate west of the Project site and State Parks lands located north of I-8. However, the proposed switchyard (approximately 3.2 acres) and gen-tie line poles would be located more than 3 miles away from Anza-Borrego Desert SP locations within the Proposed Project viewshed. Due to distance, the footprint and apparent scale of the switchyard would be substantially reduced when viewed from Anza-Borrego Desert SP lands, and the proposed switchyard and features would not be visually prominent or substantially detract from existing views. In addition, the proposed switchyard and gen-tie line poles would be located on lower-elevation lands, and as viewed from elevated vantage points located approximately 3 miles from Anza-Borrego Desert SP, the new facilities would not result in view blockage or substantial view interruption. Therefore, construction and operation of the proposed switchyard and associated gen-tie line poles would not substantially obstruct, interrupt, or detract from an existing focal or panoramic vista available from Anza-Borrego Desert SP, which are assumed to receive limited annual usage. Impacts would be **less than significant**.

### *Federal Recreation Areas*

#### *Round Mountain*

As viewed from the summit and south- and east-facing slopes of Round Mountain, the switchyard and gen-tie line poles (approximately 70 to 115 feet high) would be located approximately 1.15 miles away within the Project site boundary. Although visible to the limited number of annual hikers on Round Mountain, these elements would be located approximately 560 feet lower in elevation and near the base of a prominent hill. Due to distance and the difference in elevation, the proposed switchyard and gen-tie line poles would not result in view blockage from Round Mountain. Although the graded and leveled surface of the approximately 3.2-acre switchyard footprint, and metallic, horizontal, and vertical components within its fenced boundary would contrast with nearby hills covered with low desert shrubs, the switchyard site has been previously disturbed. In addition, the proposed switchyard would occupy a small portion of the available view from Round Mountain. As such, development of the previously disturbed site to a switchyard facility would not substantially detract from the views available from Round Mountain. Up to five 70- to 115-foot-tall poles for the 1,860-foot-long 138 kV gen-tie line would be introduced to the landscape; however, because these poles would be viewed alongside existing poles and towers traversing the area, and would be viewed against a backdrop of hilly terrain and brown-grey-colored vegetation, they would not substantially interrupt or detract from the available view. Therefore, impacts to focal or panoramic vistas from Round Mountain associated with the proposed switchyard would be **less than significant**.

### *Airport Mesa RMZ*

Although partially visible, the proposed switchyard would not be prominent or particularly distinct in northwestward or northward views from Airport Mesa. Where visible and not blocked by intervening terrain, the thin, grey lines of switchyard components and the gravel surface of the site would create color and line contrast. However, the assumed limited annual number of viewers at Airport Mesa would be focused on the wide distribution, color, and lines create of hundreds of thousands of solar panels (and horizontal access roads) across the 643-acre development footprint (see Figure 2.1-16). In addition, visible components of the proposed switchyard would be low in the landscape and would not block a particularly scenic feature from view. Lastly, the approximately 3.2-acre switchyard would occupy a small portion of the visible landscape as viewed from Airport Mesa, and would not substantially affect the panoramic and expansive qualities of the view. Therefore, impacts to focal or panoramic vistas would be **less than significant**.

### *Table Mountain RMZ*

Although visible within the Project site, the switchyard would be located approximately 4 miles away and 1,000 feet lower in elevation than the mesa located south of Table Mountain. When viewed from the elevate vantage point accessed annually by a limited number of hikers accessing the mesa, proposed grading and surfacing of the switchyard would create detectable color and line contrast. Further, the installation of hardware and equipment would introduce metallic grey color to a previously disturbed site displaying tan and gold tones. From 4 miles away, proposed gen-tie line poles would be perceived as thin lines in the landscape and would not be visually prominent. From the mesa, neither the switchyard nor 70- to 115-foot-high gen-tie line poles would result in view obstruction. Significant scenic features would not be blocked or obscured. The visible contrast would not create substantial interruption in the available long and expansive views, since hikers would not typically fixate on the relatively small, 3-acre area. Similarly, the switchyard and gen-tie line poles (and associated color and line contrast) would not substantially reduce the existing quality of the southwestward view from the mesa. Therefore, impacts to focal or panoramic vistas from the mesa south of Table Mountain (and from Table Mountain) would be **less than significant**.

### *Jacumba Wilderness*

Relative to the mesa located south of Table Mountain, the switchyard would be located a greater distance from potential viewers within the Jacumba Wilderness. As previously stated and similar to other recreational areas in the Jacumba area, the Jacumba Wilderness is assumed to receive a limited annual number of visitors, including hikers that may seek out opportunities for scenic vistas. The proposed switchyard and gen-tie line poles would be visible from elevated peaks and east-facing slopes in the Jacumba Wilderness. However, due to distance and the small apparent



scale of switchyard and gen-tie line poles relative to the expansive westward view, neither the switchyard nor the gen-tie line poles would substantially interrupt or diminish the quality of the existing views. Lastly, relative to peaks and slopes in the Jacumba Wilderness, the switchyard and gen-tie line poles would be situated low in the landscape and would not obstruct or block scenic from view. Therefore, impacts to focal or panoramic vistas from the Jacumba Wilderness due to the switchyard would be **less than significant**.

#### **2.1.3.4 Plan Compliance**

##### Guidelines for the Determination of Significance

For the purpose of this EIR, the County of San Diego Guidelines for Determining Significance, Report Format and Content Requirements – Visual Resources (County of San Diego 2007) was used to establish significance thresholds. According to the guidelines, a significant impact would result if the Proposed Project would not comply with applicable goals, policies, or requirements of an applicable County community plan, subregional plan, or historic district zoning.

##### Analysis

##### *Proposed Project*

As detailed in Table 2.1-1, Mountain Empire Subregional Plan Consistency Analysis – JVR Energy Park, the solar facility, including the substation, would comply with the relevant aesthetics goals and policies of the Mountain Empire Subregional Plan. Therefore, impacts concerning conflicts with goals and policies of the applicable County Subregional Plan would be **less than significant**.

Since Jacumba Hot Springs does not have an adopted community plan and the Jacumba Vision Statement and Background does not contain goals or policies, only the applicable subregional plan (i.e., Mountain Empire Subregional Plan) is assessed in Table 2.1-1. Lastly, the Project site is not located in a Historic District.

##### Switchyard

The proposed switchyard is a part of the project and thus would also be consistent with relevant goals and policies of the Mountain Empire Subregional Plan as detailed in Table 2.1-1. As with the Proposed Project, the switchyard site and loop-in alignments are not located in a Historic District.

### **2.1.3.5 Light and Glare**

#### **Guidelines for the Determination of Significance**

For the purpose of this EIR, the County of San Diego Guidelines for Determining Significance, Report Format and Content Requirements – Dark Skies and Glare (County of San Diego 2009) was used to establish significance thresholds. According to the dark skies and glare guidelines, a significant impact would result if:

- a. The project will install outdoor light fixtures that do not conform to the lamp type and shielding requirements described in Section 59.105 (Requirements for Lamp Source and Shielding) and are not otherwise exempted pursuant Section 59.108 or Section 59.109 of the San Diego County Light Pollution Code.
- b. The project will operate Class I or Class III outdoor lighting between 11:00 p.m. and sunrise that is not otherwise exempted pursuant Section 59.108 or Section 59.109 of the San Diego County Light Pollution Code.
- c. The project will generate light trespass that exceeds 0.2 foot-candles measured five feet onto the adjacent property.
- d. The project will install highly reflective building materials, including but not limited to reflective glass and high-gloss surface color, that will create daytime glare and be visible from roadways, pedestrian walkways or areas frequently used for outdoor activities on adjacent properties.
- e. The project does not conform to applicable Federal, State or local statute or regulation related to dark skies or glare, including but not limited to the San Diego County Light Pollution Code.

#### **Analysis**

##### **Proposed Project**

##### ***Lighting***

##### ***Construction***

Construction of the Proposed Project is anticipated to last approximately 13 months. Construction activities would generally occur during the County's allowable hours and days of operation, but may involve extended hours, as needed, to complete certain construction activities and/or during emergencies or as approved by the County. For most of the year, nighttime construction lighting would not be required. However, during emergencies, tasks requiring extended hours and during

late fall and winter months, the lack of adequate natural light may dictate that portable lighting sources be used at specific construction sites.

When required, portable construction night lighting would temporarily illuminate and be focused on active areas of construction. All temporary construction lighting would be compliant with the County's Light Pollution Code. Specifically, portable night lighting used during construction would be fully compliant with the lamp type and shielding requirements for Class II lighting as established by Section 51.204 of the County Light Pollution Code. Lighting would be fully shielded and directed downward to minimize opportunities for unnecessary sky glow and light trespass. Due to the anticipated limited frequency of night construction lighting use and through compliance with the lamp type and shielding requirements of the County Light Pollution Code, short-term construction lighting impacts to nighttime views would be **less than significant**.

### *Operation*

*Would the project install outdoor light fixtures that do not conform to the lamp type and shielding requirements described in Section 59.105 (Requirements for Lamp Source and Shielding) and are not otherwise exempted pursuant Section 59.108 or Section 59.109 of the San Diego County Light Pollution Code?*

Because the Proposed Project is subject to compliance with applicable ordinances and regulations of the County, all outdoor light fixture would conform to the lamp type and shielding requirements of the San Diego County Light Pollution Code. Motion-sensored lights would be installed at all site access driveway entrances and would only be used if motion is detected. No other lighting is proposed within the solar facility. The motion-sensored lights would have bulbs that do not exceed 100 watts, and all lights would be shielded and directed downward to minimize potential effects to nighttime views and dark skies in the surrounding area. These efforts would also minimize the potential for light trespass onto adjacent off-site properties. Except for lights installed off Old Highway 80 at the site entrance that would be on after 5:00 p.m., lighting would be used on an as-needed basis and would normally be turned off unless nighttime access to the site is required. Entrance lights would be shielded and would conform to the Light Pollution Code's lamp type requirements. Since maintenance activities are not anticipated to be completed during the evening hours, lights within the interior of the substation site would normally be turned off. Maintenance crews would carry lights when performing maintenance work after 5:00 p.m. As such, the Proposed Project would conform to the lamp type and shielding requirements of the San Diego County Light Pollution Code, and impacts would be **less than significant**.

*Would the project operate Class I or Class III outdoor lighting between 11:00 p.m. and sunrise that is not otherwise exempted pursuant Section 59.108 or Section 59.109 of the San Diego County Light Pollution Code?*

No Class I or Class III outdoor lighting is proposed to be installed on the JVR Energy Park site. As a solar energy park facility, outdoor lighting for an outdoor sales or eating area, vehicle fueling area, assembly or repair area, billboard or other sign, recreational facility, or other similar application (i.e., Class I lighting) would not be required. In addition, outdoor lighting used for decorative effects, such as architectural illumination, flag and monument lighting, and landscape lighting (i.e., Class III lighting), is not proposed to be installed on the site. As such, Class I or Class III lighting would not be installed, and operation of the Proposed Project would not be inconsistent with Section 59.108 or Section 59.109 of the San Diego County Light Pollution Code. **No impacts** would occur.

*Would the project generate light trespass that exceeds 0.2-foot-candles measured five feet onto the adjacent property?*

Under existing conditions, no sources of nighttime lighting operate on the Project site. Upon implementation of the Proposed Project, operational nighttime lighting sources would be introduced to the site, and more specifically, lighting would be provided at the site entrance gates/driveways off Carrizo Gorge Road and Old Highway 80 and within the Project site interior at the on-site substation. The nearest entrance gates off Carrizo Gorge Road would be located approximately 1,000 feet southeast of the Chevron Jacumba gas station. There are no occupied residential properties near the proposed entrance gates, and the area is exposed to nighttime lighting associated with nearby gas station development. Gates would be set back approximately 200 feet or greater from non-Proposed-Project-controlled property north and east of Carrizo Gorge Road, and this property is currently developed as a parking lot and features overhead lighting around the perimeter of the lot. The driveways and entrance gates constructed off Old Highway 80 would be located near an assumed occupied rural residential property that is not included in the Proposed Project boundary.

The driveway entrance to the substation would have motion-sensored lights that would only be used if motion is detected. No other lighting is proposed within the substation. The motion-sensored lighting would have bulbs that do not exceed 100 watts, and all lights would be shielded and directed downward and would comply with the County of San Diego Light Pollution Code, also known as the Dark Sky Ordinance (Section 51.201 et seq.). With these measures, all measurable lighting would be retained at the access driveway and would not trespass onto non-Proposed-Project properties or occupied properties in the surrounding area. Therefore, light trespass impacts would be **less than significant**.

*Would the project install highly reflective building materials, including but not limited to reflective glass and high-gloss surface color that will create daytime glare and be visible from roadways, pedestrian walkways or areas frequently used for outdoor activities on adjacent properties?*

Although the Proposed Project does not propose to install traditional highly reflective building materials, such as glass windows or metallic siding, the Proposed Project would entail the introduction of glass-surfaced solar panels on single-axis racks across an approximate 643-acre fenced site. The proposed solar panels would be uniformly dark in color, non-reflective, and designed to be highly absorptive of all light that strikes their glass surfaces. In addition, Proposed Project components, including the on-site substation, inverters, battery energy storage system containers, and the overhead slack span transmission line, would be constructed of steel and/or other metallic materials and depending on daily atmospheric conditions, may be sources of daytime glare. The Project site is visible from I-8, Carrizo Gorge Road, and Old Highway 80, and the Proposed Project boundary abuts residential properties in Jacumba and the Jacumba Airport. To determine the potential for proposed solar panels to generate distraction glare that could be received by viewers within 1 mile of the Project site on local roads (specifically I-8, Old Highway 80, and Carrizo Gorge Road), at residential properties in Jacumba, or the Jacumba Airport runway approaches (i.e., east and west), Power Engineers Inc. prepared a Glare Study, which is included in the Visual Resources Report (Appendix B).

The glare study used the Solar Glare Hazard Analysis Tool licensed by GlareGauge, and meets Federal Aviation Administration (FAA) requirements for airport operations. Runway approaches, residential, I-8, Old Highway 80, and Carrizo Gorge Road motorist analysis points within 1 mile of the Project site were identified and assessed by Power Engineers. Details of solar technologies to be constructed at the Project site, including tracking axis orientation (180 degrees due south), maximum tracking angle (55 degrees), wake angle (5 degrees), stow angle (5 degrees), mount height, and application of anti-reflective-coated smooth-surface glass, was provided by BayWa Renewable Energy. The anti-reflective coating is a treatment to solar panel glass designed to reduce reflected light and increase panel efficiencies. Proposed solar operations were analyzed from the perspective and viewpoint of motorists, residents, and pilots. The locations of the points analyzed are shown in Figure 5 of the Glare Study (Appendix A of Appendix B).

For all arrays, the 55-degree array tracker rotational limits combined with the 5-degree wake/stow angle would cause any potential glare to be redirected above and away from analyzed sensitive viewers (i.e., residential locations and motorists on I-8, Old Highway 80, and Carrizo Gorge Road) throughout the day and year. Specifically, no annual glare was calculated to be received at the 14 discrete plotted locations on Carrizo Gorge Road and Old Highway 80 or at the 20 discrete plotted locations on I-8 near the Project site. Regarding analyzed receptor locations, proposed tracker rotational limits, and the presence of slatted fencing and landscaping would result in any potential glare being angled above

these locations. To clarify, Power Engineers determined that local area motorists and residents would receive no glare during Proposed Project operations. As such, the daytime views of these receptors, and outdoor activities on adjacent properties, would not be substantially affected by Proposed-Project-generated glare. Impacts would be **less than significant**.

After review of the GlareGauge analysis, Power Engineers determined that potential glare visible from the proposed solar operations would be limited to the Runway 7 approach (i.e., west approach) during the afternoon hours of the winter months, lasting for less than 1 hour per day. Potential glare reported has a hazard level of “green” (low potential for temporary after-image), which is acceptable by the FAA. During the morning hours, the modified wake angle of arrays south of Old Highway 80 would redirect any potential glare up and out of the view of pilots landing on the Runway 7 approach. Given that the exposure of pilots to Proposed-Project-generated glare would be limited throughout the year and would be within the range deemed acceptable by the FAA, the Proposed Project, and more specifically, Proposed-Project-generated glare, would not substantially affect the daytime views of pilots on the Jacumba Airport Runway 7 approach. Therefore, glare impacts associated with solar panels would be **less than significant**.

As previously stated, in addition to solar panels, the Proposed Project includes other components/facilities that may produce daytime glare due to use of metallic materials. Regarding to the on-site substation, the facility would not be visible from pedestrian walkways or areas on adjacent properties used for outdoor activities. The substation would be visible from I-8 (see Key View 1; Figure 2.1-9) but would be distant from motorist. Due to distance, the on-site substation would tend to blend into background terrain in the views of I-8 motorists. Brief views to the on-site substation would be available from Carrizo Gorge Road; however, potential glare received by motorists would be minor, located in the periphery of views, and would not be expected to create nuisance or distraction that would result in unsafe driving conditions. Components including inverters, battery energy storage system containers, and overhead slack span transmission line would be visible from public roads, including I-8 and Carrizo Gorge Road. In absence of non-reflective or reduce reflectivity design measures, these components may create daytime glare that could be visible from roadways. As such, impacts are considered **potentially significant (Impact AE-10)**.

*Would the project not conform to applicable Federal, State or local statute or regulation related to dark skies or glare, including but not limited to the San Diego County Light Pollution Code?*

For the construction phase, please refer to the construction lighting analysis above, under the “Construction” heading.

Similar to construction lighting, operational lighting would be shielded and directed downward to minimize potential effects to nighttime views and dark skies in the surrounding area. These efforts

would also minimize the potential for light trespass onto adjacent off-site properties. Lighting would be used on an as-needed basis and would typically be turned off unless nighttime access to the Project site is required. In addition, since maintenance activities are not anticipated to be completed during the evening hours, lights within the interior of the substation site would normally be turned off. If nighttime maintenance is required, maintenance crews would carry lights when performing maintenance work after 5:00 p.m. Further, all lighting sources installed at the solar facility would have bulbs that do not exceed 100 watts and would comply with the County of San Diego Light Pollution Code, also known as the Dark Sky Ordinance, Section 59.101 et seq., regarding lamp type and shielding requirements. Lastly, the Proposed Project would be designed in accordance with the San Diego County Zoning Ordinance, Performance Standards, Sections 6322 and 6324, that guide performance standards for control of excessive or unnecessary outdoor light emissions. Due to the limited installation and use of nighttime lighting on site during operations, through compliance with County Light Pollution Code requirements and zoning ordinance standards regarding lighting, and based on the glare analysis presented above, lighting installed at the JVR Energy Park would conform to applicable federal, state, and local statutes and regulations related to dark skies and glare. Impacts would be **less than significant**.

### Switchyard

*Would the project install outdoor light fixtures that do not conform to the lamp type and shielding requirements described in Section 59.105 (Requirements for Lamp Source and Shielding) and are not otherwise exempted pursuant Section 59.108 or Section 59.109 of the San Diego County Light Pollution Code?*

At the switchyard, lighting would be installed primarily for security and safety. Lighting would be placed near major electrical equipment in the switchyard and would be mounted near the entry gate to safely illuminate the switchyard entry. Yard lights would normally be turned off and would only be used during nighttime for security and safety reasons. An entry light to the switchyard facility would be installed and would be left on during nighttime hours to allow the entry to be illuminated if nighttime emergency repair or maintenance are needed. All lighting at the switchyard would be shielded and directed downward to minimize the uplighting and light trespass onto surrounding properties. Further, except for the entry light, lights would typically be off when not in use. Lastly, all lighting sources installed at the solar facility would have bulbs that do not exceed 100 watts, would comply with the County of San Diego Light Pollution Code, and would be designed in accordance with the San Diego County Zoning Ordinance Performance Standards Sections 6322 and 6324. Through compliance with County Light Pollution Code requirements and zoning ordinance standards regarding lighting, lighting installed at the switchyard would conform to applicable federal, state, and local statutes and regulations related to dark skies and glare. Therefore, impacts would be **less than significant**.

*Would the project operate Class I or Class III outdoor lighting between 11:00 p.m. and sunrise that is not otherwise exempted pursuant Section 59.108 or Section 59.109 of the San Diego County Light Pollution Code?*

No Class I or Class III outdoor lighting would be installed at the switchyard. As a switchyard facility, outdoor lighting for outdoor sales or eating area, vehicle fueling area, assembly or repair area, billboard or other sign, recreational facility, or other similar application (i.e., Class I lighting) would not be required. Further, decorative outdoor lighting (i.e., Class III lighting) would not be installed on the switchyard site. Therefore, **no impacts** would occur.

*Would the project generate light trespass that exceeds 0.2-foot-candles measured five feet onto the adjacent property?*

Operational lighting at the switchyard would be shielded and directed downward to minimize potential effects concerning light trespass onto adjacent properties. The proposed switchyard is located approximately 500 feet from the Proposed Project boundary and adjacent to undeveloped property. Through the inclusion of shielded and downward-casting lighting, and due to the distance between the facility and occupied properties outside of the Project site, impacts associated with light trespass generated by entry gate lighting would be **less than significant**.

*Would the project install highly reflective building materials, including but not limited to reflective glass and high-gloss surface color that will create daytime glare and be visible from roadways, pedestrian walkways or areas frequently used for outdoor activities on adjacent properties?*

Highly reflective building materials, such as glass windows and metallic siding, would not be installed at the switchyard. However, the switchyard would include metallic equipment and components constructed of steel and other similar materials. The switchyard would have limited visibility from pedestrian walkways and immediately adjacent properties that are used for outdoor activities. The switchyard would be visible from I-8 and Carrizo Gorge Road. However, metallic components and equipment installed at substations and switchyards, including the existing East County Substation that is visible from I-8, are not particularly reflective and would not be expected to create nuisance or distraction glare that would result in unsafe driving conditions on either I-8 or Carrizo Gorge Road. Regarding the gen-tie line, the materials under consideration for support poles are already used by electrical infrastructure in the existing landscape, and rust-colored steel or galvanized tubular steel are not typically considered to be highly reflective. Therefore, glare impacts would be **less than significant**.



*Would the project not conform to applicable Federal, State or local statute or regulation related to dark skies or glare, including but not limited to the San Diego County Light Pollution Code?*

Please refer to the lighting- and glare-related discussions for the switchyard, above. Lighting controls, including the use of shielded fixtures and downward casting of lighting, would be implemented to minimize opportunities for impacts to dark skies and impacts concerning the creation of new glare conditions. Based on the analysis presented above, impacts related to dark skies and glare would be **less than significant**.

### 2.1.4 Cumulative Impact Analysis

#### Methodology

For most projects, the cumulative study boundary for visual resources encompasses the project viewshed. The character elements of cumulative development occurring within a viewshed contribute to the overall visual character of the viewshed and affect, either negatively or positively, the quality of existing views of the landscape. However, when scenic roads are included in a viewshed, an expanded cumulative study area is warranted. A project and other development occurring or planned within the viewshed of a designated scenic road could combine to permanently alter the visual character of the landscape and diminish the quality of existing views of valued scenic resources. For purposes of this analysis, the “List of Projects” method was used for the cumulative impacts discussion.

#### Cumulative Projects

Cumulative projects considered in this analysis are those in the study area that would produce similar visual effects as the Proposed Project. Therefore, for purposes of this analysis, electric substation, solar energy, wind energy, transmission line, and energy storage projects within the cumulative study area were considered, and they include highly visible and distinct elements (e.g., wind turbines) or would create similar form, line, color, and texture contrasts as the Proposed Project. Table 1-4, Cumulative Projects, describes the cumulative projects considered in this analysis.

The following projects were considered in the cumulative impact analysis provided below.

#### Tule Wind Project (Operational; Phase II Approved)

Phase I of the Tule Wind project consists of 57 wind turbines, an underground electrical collection system linking the wind turbines to the collector substation, a 5-acre collector substation site and adjacent 5-acre operations and maintenance facility site, and meteorological towers. The Tule Wind project is located in the McCain Valley area of Boulevard, approximately 8 miles northwest of the Project site. The Tule Wind project delivers power through a substation via a 138 kV gen-tie line running south to an interconnection with the existing SDG&E rebuilt Boulevard substation.

In October 2016, Avangrid Renewables received approval from the California State Lands Commission to construct Phase II of the Tule Wind project. Phase II would consist of an additional 24 wind turbines constructed in the area that would generate approximate 69 MW. The wind turbines of Phase II would be located atop a ridgeline west of Phase I on both state lands and tribal lands of the Ewiiapaayp Band of Kumeyaay Indians. Seven wind turbines would be sited on lands managed by the California State Lands Commission and 17 turbines would be constructed on tribal lands. Construction of Phase II is likely to take 6 months to 1 year, and would employ between 100 and 200 workers per day during the peak construction period.

#### Kumeyaay Wind Project (Operational)

The existing Kumeyaay Wind project consists of a 25-wind-turbine energy-generation facility on tribal lands of the Campo Band of Diegueño Mission Indians Reservation. Wind turbines are installed atop the Tecate Divide, approximately 9.85 miles northwest of the Project site.

#### Jacumba Solar Energy Project (Operational)

The existing 20 MW, 108-acre solar facility is located 2 miles east of the Project site. The Jacumba Solar Energy project consists of approximately 81,108 PV modules fitted on 2,253 fixed-tilt rack panels.

#### East County Substation Project (Operational)

The East County Substation consists of the construction of a 500/230/138 kV substation on approximately 86 acres, a short loop-in of the existing Southwest Powerlink to the East County Substation, a new overhead 138 kV transmission line that would connect the substation to the Boulevard Substation, and rebuild of the Boulevard Substation to provide 138 kV and 69 kV facilities on a 3.2-acre site. The substation, segments of the 138 kV transmission line (part of the transmission line would be installed within Old Highway 80), and the rebuilt Boulevard Substation are visible from I-8. The East County Substation is located approximately 2 miles east of the Project site, and a segment of the proposed 138 kV transmission line passes through the central portion of the Project site.

#### Energia Sierra Juarez U.S. Transmission Line (approved and constructed as of January 2015)

As approved by the County Board of Supervisors in August 2012, this project would construct approximately 1-mile-long, dual-circuit 230 kV power lines from the U.S./Mexico border north to the East County Substation. The power lines would deliver power generated at the Energia Sierra Juarez wind project located in the town of La Rumorosa in Mexico to the East County Substation. The East County Substation is located approximately 2 miles east of the Project site.

### Rugged Solar Project (proposed modification to approve Major Use Permit in progress)

As proposed, the Rugged Solar Project would include construction and operation of a 74 MW solar energy system in the McCain Valley. In addition to solar panels and inverter and transformer units, the Rugged Solar Project would include an on-site collector substation, a 138 kV overhead and underground transmission line, and an approximately 20 MW battery energy storage system. The Rugged Solar Project is located approximately 4.5 miles northwest of the Project site.

### Torrey Wind Project (currently in planning stages)

The proposed Torrey Wind project would consist of an approximately 126 MW wind energy facility. The project would include approximately 30 new wind turbines (rated up to 4.2 MW each), an underground electrical collection system, a high-voltage substation, a 500 kV switchyard, an operations and maintenance facility and associated parking areas, a temporary staging area, a batch plant, meteorological towers, various access roads, and off-site improvements. The Torrey Wind project site is located approximately 7.6 miles northwest of the Project site.

### Campo Wind Project with Boulder Brush Facilities (currently in planning stages)

The Campo Wind Project proposes a 250 MW wind energy generation facility consisting of 60 wind turbines on approximately 2,200 acres within the Campo Band of Diegueño Mission Indians Reservation (Reservation). In addition to wind turbines, the Campo Wind Project would include a collector substation; operations and maintenance facility; on-Reservation gen-tie line; access roads; and temporary areas, including a laydown yard and concrete batch plant on the Reservation. The Boulder Brush Facilities would include construction of a gen-tie line, high-voltage substation, and switchyard on approximately 200 acres of private lands under the County's jurisdiction. The Campo Wind Project and Boulder Brush Facilities are located approximately 7.6 miles northwest of the Project site.

### Boulevard Solar (currently in planning stages)

Modification to a Major Use Permit is currently proposed for a 60 MW solar energy system on an approximately 420-acre site located north of I-8 and east and west of McCain Valley Road on private land under the County's jurisdiction. The Boulevard Solar project site is located approximately 9 miles from the Project site.

### Boulevard Energy Storage (currently in planning stages)

The Boulevard Energy Storage project would include a 100 MW energy storage facility (2-acre development footprint). The Boulevard Energy Storage Project site is located approximately 4.75 miles northwest of the Project site.

### Cameron Solar (currently in planning stages)

The Cameron Solar project would include a 1.7 MW solar energy storage system consisting of approximately 19 acres on a 164.7-acre parcel. The Cameron Solar Project site is located approximately 18 miles west of the Project site.

### Cumulative Impact Analysis

#### Visual Character and Quality and Valued Visual Character

The Proposed Project would not be consistent with the undeveloped, desert landscape and small town character of Jacumba. Cumulative projects in the area include existing and proposed electric substations, solar energy facilities, wind energy facilities, and transmission projects located within the Proposed Project viewshed and the greater surrounding area. This composite viewshed was determined to be an appropriate cumulative boundary based on the type and geographic extent of the Proposed Project's visual impacts, further described below. In addition, the composite viewshed would encompass projects resulting in similar visually prominent impacts as the Proposed Project, which would have the potential to change the character of the landscape as viewed from the I-8 corridor and other local roads traversing the Jacumba area, including Old Highway 80 and Carrizo Gorge Road.

In addition to existing utility development in the area, including the Tule Wind project, Kumeyaay Wind project, Jacumba Solar, East County Substation, and Energia Sierra Juarez transmission line, implementation of the Proposed Project and other foreseeable projects considered in the cumulative scenario would result in an increasingly modified landscape, diminished day and night views, and reduced visual quality. Contrasts in structure and facility scale, size, massing, color, and materials associated with cumulative projects and less-intensely developed (and undeveloped) lands would be visible to a relatively large volume of viewers within the cumulative study area, including motorists on federal and state highways, local roads (including County-designated scenic corridors), users of County- and state-designated trails, users of recreational lands, and rural and tribal communities. As further described under the "Focal or Panoramic Vista" discussion below, the effects of identified cumulative projects from a given vantage point would ultimately be dependent on the vertical scale of components, proximity of observers to projects, and presence (or lack) of intervening elements (terrain, structures, vegetation) to screen or obstruct specific components from view.

However, the sheer 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 that would be impossible to overlook. Further, the introduction of numerous prominent and

bold structures and facilities would moderately to strongly contrast with the valued visual character of the local communities in the cumulative study area.

Existing development in the cumulative study area primarily has a rural residential and ranching/grazing character. However, the area is also marked by interstate and local road development, regional electrical infrastructure and substations, and utility-scale solar and wind energy development. Regional electrical infrastructure and solar and wind development, including the Tule Wind Project, Kumeyaay Wind Projects, and Jacumba Solar Project, occur along the I-8 corridor. Power lines, including the East County Substation 138 kV transmission line and the 500 kV Southwest Powerlink and Sunrise Powerlink lines, traverse the Jacumba and McCain Valley landscapes. These existing transmission lines also cross the Project site. In addition to the Proposed Project, elements of cumulative projects in the planning stage, including Rugged Solar, Torrey Wind, and Campo Wind, would be visible from the I-8 corridor. As with the Proposed Project, solar and wind projects with visually prominent components and/or large footprints of development would typically result in the removal or substantial adverse change of one or more features that contribute to valued visual character. For example, the Campo Wind and Torrey Wind Projects would result in diminished openness in the landscape and the removal of oak vegetation—elements that are identified in the Boulevard Community Plan as contributing to the valued visual character of the community. Similarly, the Proposed Project would result in the removal of vegetation throughout the site, and would degrade the open, unencumbered characteristic of the Project site.

Except for developed sites supporting wind, electrical transmission, solar energy, or substation facilities, landscapes throughout the cumulative study area generally have moderate to high scenic integrity. In these areas, rural residential, commercial, and public service development and other modifications display relatively unobtrusive characteristics and design features, and a consistency in scale, form, and theme. As a result, these traditional types of existing development are well-integrated into the landscape and tend not to command the attention of receptors in the area.

Implementation of projects considered in the cumulative scenario would result in an increasingly modified landscape, diminished day and night views, and reduced visual quality. For example, development of 30 wind turbines on approximately 2,226 acres proposed by the Torrey Wind project and 2,400 acres of wind development proposed under Campo Wind, in conjunction with the Proposed Project and others in the area, would dominate views in the Project region and result in prominent visual change within the largely undeveloped landscape. Therefore, the Proposed Project would result in a **cumulatively considerable impact (Impact AE-CU-1)** on the existing visual character and valued visual character or image of neighborhoods, communities, and localized areas.

## Focal or Panoramic Vistas

As discussed in Section 2.1.1.1, views to the Project site are available from I-8; Old Highway 80; Carrizo Gorge Road; nearby recreation areas, including Jacumba Community Park and Anza-Borrego Desert SP; and federal recreational areas, including Round Mountain, Airport Mesa, and Table Mountain RMZs and the Jacumba Wilderness. Although proximity to the Proposed Project from these locations and the clarity of Proposed Project components would vary, each of the identified recreation areas are located in the Proposed Project viewshed (see Figure 2.1-7). The existing Jacumba Solar, Energia Sierra Juarez transmission line, and East County Substation are located east of the Project site and visible from similar public roads and scenic corridors, and recreational areas; therefore, cumulative projects outside of the Proposed Project viewshed would also be experienced by similar receptors. For example, the Proposed Project would be visible from I-8, and cumulative wind and solar projects, including the Kumeyaay, Campo, Torrey Wind, and Rugged Solar projects would also be visible from I-8 and would cumulatively affect the quality of the interstate viewshed. However, because the Proposed Project would not result in a significant impact to focal or panoramic vistas from I-8, the Proposed Project would not combine with existing and proposed wind and solar development in the study area to create a cumulative impact on interstate vistas.

Similarly, from Airport Mesa and the mesa south of Table Mountain, existing wind turbines of the Kumeyaay Wind Project atop the Tecate Divide and Tule Wind Project are faint but visible, and proposed wind turbines of the Campo and Torrey Wind Projects would likely be detectable in future views. However, due to distance and the thin, faint lines displayed by tall wind turbines, a cumulative impact to the existing panoramic views from Airport Mesa and the mesa south of Table Mountain would not occur. Views would not be obstructed by components of the Proposed Project or by distant yet visible elements of cumulative projects. However, as viewed from the mesa south of Table Mountain, projects, including the East County Substation, Jacumba Solar, and the Proposed Project, would alter the existing character and quality of the visible landscape. Although components of these projects would not result in substantial view blockage, the large footprints of the development and contrasting forms, lines, and colors are particularly noticeable in the local desert environment and tend to interrupt the panoramic view from the mesa south of Table Mountain. Therefore, combined with the existing East County Substation and Jacumba Solar projects, the Proposed Project would result in a cumulatively considerable impact (**Impact AE-CU-2**) on the panoramic vista available from elevated vantage points in the Airport Mesa and Table Mountain RMZs.

## Community and Subregional Plan Conflicts

As identified in Section 3.1.4, Land Use and Planning, of this EIR, the Proposed Project would be consistent with the Mountain Empire Subregional Plan. Similarly, related projects considered in the cumulative scenario and located on County lands would be required to demonstrate compliance

with the applicable policies and regulations of the Mountain Empire Subregional Plan and/or additional plans, including the Boulevard Community Plan, Campo/Lake Morena Community Plan, and Potrero Community Plan. Public lands projects (i.e., Tule Wind Project) and projects proposed on tribal lands (i.e., Campo Wind Project) would be required to demonstrate compliance with the relevant plans and policies of lead agencies. For all projects considered in the cumulative analysis, project-specific analysis would be required to ensure that projects considered in the cumulative scenario are compatible with applicable plans and policies. Because the Proposed Project would comply with the goals, policies, and requirements of the Mountain Empire Subregional Plan, and because similar development has occurred and is proposed in the subregional plan area, the Proposed Project **would not result in a cumulatively considerable impact** associated with plan conflicts.

### Light and Glare

Similar to the Proposed Project, identified cumulative projects would be evaluated on a project-by-project basis to determine the severity of lighting and glare impacts. Outdoor lighting at the Project site would only contain motion-sensored lights that would be installed at all site access driveway entrances and would only be used if motion is detected. No other lighting would be included in the Proposed Project. The motion-sensored lights would be shielded and directed downward, per the requirements of the County's Light Pollution Code and the San Diego County Zoning Ordinance. Furthermore, all outdoor lighting installed at the Proposed Project would conform to the B lamp type and shielding requirements of the Light Pollution Code. Conformance with the San Diego Light Pollution Code Zone B lamp type and shielding requirements would minimize the potential for light trespass onto adjacent properties and excess illumination of the nighttime sky. All other proposed cumulative solar facilities are anticipated to have similar operational lighting scenarios as the Proposed Project. In addition, all of the proposed cumulative projects located on private lands under County land use jurisdiction would be required to conform to the applicable lighting and shielding requirements of the San Diego Light Pollution Code. Through conformance with existing County regulations, the Proposed Project would not contribute to a potential cumulative lighting effect associated with facility lighting. Since the Proposed Project would not install FAA obstruction lighting, which is required of vertical elements taller than 200 feet above ground plane, operation of the Proposed Project would not generate blinking lighting within the Proposed Project boundary. As such, the Proposed Project would not combine with the existing and proposed wind energy projects in the cumulative scenario to create a cumulative nighttime lighting impact.

As previously discussed, the Project site is visible from I-8, Carrizo Gorge Road, and Old Highway 80, and the Project site abuts residential properties in Jacumba and the Jacumba Airport. Adjacent properties, including Jacumba Community Park, Anza-Borrego Desert SP, and Round Mountain, are also used (albeit infrequently) for outdoor recreation. The Glare Study prepared for the

Proposed Project (see Appendix B) determined that proposed tracker rotational limits and the presence of slatted fencing and landscaping along the property frontage of Old Highway 80 and the eastern Proposed Project boundary would result in any potential glare being angled above these locations and away from potential viewers. Although local area motorists on Old Highway 80, Carrizo Gorge Road, and I-8, and residents of Jacumba, would receive no glare during Proposed Project operations, the conclusions of the Glare Study suggest that Proposed Project glare may be angled such that glare is received at the summit or slopes of Round Mountain and at adjacent State Park lands west of the Project site. However, as detailed in Section 2.1.3, Round Mountain and adjacent State Park lands west of the Project site receive limited use from local hiking groups. As such, potential glare received at Round Mountain and adjacent State Park lands **would not result in a cumulatively considerable impact**.

As discussed in Section 2.1.3.5, potential glare visible from the proposed solar operations would be limited to the Runway 7 approach (i.e., west approach) during the afternoon hours of the winter months lasting for less than 1 hour per day. The glare study indicated that no glare from proposed solar panels would be received by motorists on roadways, walkways, or other areas. Given that the exposure of pilots to Proposed-Project-generated glare would be limited throughout the year and would be within the range deemed acceptable by the FAA, the Proposed Project and more specifically, Proposed-Project-generated glare, would not substantially affect the daytime views of pilots on the Jacumba Airport Runway 7 approach. It is anticipated that all related projects would also be required to analyze and mitigate potential impacts to glare. As such, glare from Proposed Project components would not combine with the anticipated glare effects associated with other solar projects to create a cumulative glare impact to daytime views in the area. Therefore, the Proposed Project **would not result in a cumulatively considerable impact** associated with light and glare.

### 2.1.5 Significance of Impacts Prior to Mitigation

#### Threshold 1

*Would the project introduce features that would detract from or contrast with the existing visual character and/or quality of a neighborhood, community, or localized area by conflicting with important visual elements or the quality of the area (such as theme, style, setbacks, density, size, massing, coverage, scale, color, architecture, building materials, etc.) or by being inconsistent with applicable design guidelines?*

The proposed theme and style of Proposed Project development (i.e., solar energy development) would not be consistent with the undeveloped, desert landscape and small-town character of Jacumba. The height of the proposed panels (approximately 12 feet high) would be consistent with the height of typical single-story residential development in the Jacumba area. Components within



the collector substation, including a 65-foot-high, 138 kV dead-end structure (steel A or H-frame design), and switchyard, including five 70- to 115-foot-tall loop-in support poles, would be consistent with the scale of the existing electrical transmission development in the local landscape. However, the wide distribution of repeating rows of solar panels on the disturbed approximately 643-acre site would create noticeable horizontal scale and massing contrasts with adjacent areas of residential development. In addition, the Proposed Project would install thousands of uniformly dark solar panels (and potentially light-colored inverters, battery energy storage system containers, and reflective transmission line conductor) to an area that consists mostly of earth tones, modest and lightly colored residential structures, and undeveloped lands. Thus, the color of proposed solar panels would not be consistent with the predominant colors displayed by features in the existing landscape. Solar panel contrasts would be further heightened by lightly colored inverters and battery energy storage system containers, and reflective transmission line conductor. Therefore, the characteristics of the Proposed Project would conflict with the established character of the Jacumba community, and would result in a **potentially significant** impact (**Impact AE-1**).

### Switchyard

Similar to the JVR Energy Park Project, the switchyard would not represent the traditional development theme and style of the Jacumba area. Although views of the switchyard and gen-tie line from I-8 and Carrizo Gorge Road would be brief and visual contrasts would be muted by distance, both the nature of the development and the scale and massing of the approximately 140,000-square-foot facility would create moderately strong contrasts in the landscape. Although there are existing transmission lines in the vicinity of the proposed switchyard, like these uses, the proposed switchyard would not replicate the predominant theme and style of the Jacumba area. The character of the proposed switchyard would detract from the established character of the larger Jacumba area and would conflict with the established theme and style of the area that is predominantly associated with an undeveloped desert landscape, including flat valley terrain, rugged and rocky mountains, rolling hills, and scrub vegetation. The impact of the switchyard would be **potentially significant** (**Impact AE-1**).

### Threshold 2

*Would the project result in the removal or substantial adverse change of one or more features that contribute to the valued visual character or image of the neighborhood, community, or localized area, including but not limited to landmarks (designated), historic resources, trees, and rock outcroppings?*

Implementation of the Proposed Project and the transformation of the Project site to a solar energy facility would result in the removal of vegetation throughout the site. The introduction of visually prominent Proposed Project components, including solar panels, would substantially change the

quality of existing views across the site. Further, the proposed solar facility would conflict with the small-town character of Jacumba and open, unencumbered characteristics of the Project site. The Proposed Project's anticipated visual change and effects to existing visual character would result in a **potentially significant impact (Impact AE-2)**.

### Switchyard

The proposed switchyard site encompasses undeveloped yet previously disturbed lands located approximately 0.60 miles south of I-8 and 0.25 miles west of Carrizo Gorge Road. On-site terrain gradually slopes from east to west; however, the site is generally flat and is covered with tan-colored soils and scrubby shrubs. The site is also crossed by several dirt access roads. The site does not contain landmarks, trees, or prominent rock outcroppings. Although development of the switchyard and gen-tie line would alter the existing character of the previously developed site, it is situated near the base of a prominent hill and visually screened from most public vantage points in the area, including Old Highway 80 and the Jacumba residential area. In addition, the proposed switchyard would not shorten available views across the Jacumba Valley. Still, construction and operation of an approximately 140,000-square-foot switchyard surrounded by security fencing and housing a 138 kV insulated electrical bus, steel support structures and foundations, and a concentration of additional electrical equipment would adversely alter the valued open and unencumbered characteristics of the Jacumba area. Therefore, the switchyard impacts would be **potentially significant (Impact AE-2)**.

### Threshold 3

*Would the project substantially obstruct, interrupt, or detract from a valued focal and/or panoramic vista from:*

- *a public road,*
- *a trail within an adopted County or State trail system,*
- *a scenic vista or highway; or*
- *a recreational area?*

The Proposed Project would create visible contrast that would result in reduced visual quality from viewing locations in the surrounding area. In addition to notably reduced visual quality associated with the introduction of solar panels (and other Proposed Project components) as viewed from I-8, implementation of the Proposed Project would substantially obstruct a focal vista, Old Highway 80. Further, the distribution of 300,000 PV modules across the Project site and alteration of the open, primarily undeveloped character of the Project site to a solar facility displaying repeating visual elements would create strong visual contrast. Following implementation of the Proposed Project, reduced intactness and unity (i.e., reduced visual quality) is anticipated in scenic views

available from local recreational areas (e.g., Jacumba Community Park). State Park lands located to the immediate west of the Project site, and federal recreational areas, including Round Mountain and the Airport Mesa and Table Mountain RMZs, experience relatively low annual recreation use by the public (BLM 2020), but the visual change associated with the Proposed Project as experienced from these locations would be pronounced. In addition, the proximity of these recreational lands would heighten perceived form, line, and color contrast, and the Proposed Project would occupy a substantial portion of the visible landscape in available views.

Thus, impacts to focal or panoramic vistas (i.e., Threshold 3) from I-8 (**Impact AE-3**), Old Highway 80 (**Impact AE-4**), Jacumba Community Park (**Impact AE-5**), Anza-Borrego Desert State Park lands (**Impact AE-6**), Round Mountain (**Impact AE-7**), Airport Mesa (**Impact AE-8**), and Table Mountain and the nearby mesa to the south (**Impact AE-9**) would be **potentially significant**.

### Switchyard

The switchyard and associated gen-tie to the existing transmission line would be visible from public roads, including County-designated scenic corridors, Jacumba Community Park, and State Recreational areas (i.e., Anza-Borrego Desert SP lands located to the west, northwest of the switchyard site). In addition, the switchyard site may be visible from federal recreational areas, including Round Mountain, elevated vantage points in the Airport Mesa and Table Mountain RMZs, and Jacumba Wilderness. Although remote, views to the switchyard site may also be available from elevated vantage points in the Carrizo Gorge Wilderness (managed by BLM and located approximately 4 miles northwest of the switchyard site). However, the approximately 3-acre switchyard and gen-tie would be relatively distant from the elevated vantage points provided at these locations, and the new facilities and features would not be visually prominent. The new switchyard facilities would also not result in view blockage from scenic corridors or local state or federal recreational areas. Lastly, because the switchyard and gen-tie would occupy a small area within the visible landscape, the switchyard and associated gen-tie line poles would not substantially obstruct, interrupt, or detract from an existing focal or panoramic vista available on a scenic corridor or at a nearby recreation area. Impacts would be **less than significant**.

### Threshold 4

*Would the project not comply with applicable goals, policies or requirements of an applicable County Community Plan, Subregional Plan, or Historic District's Zoning?*

As shown in Table 2.1-1, the Proposed Project was determined to be consistent with the identified aesthetic and visual policies and goals of the Mountain Empire Subregional Plan. A specific community plan for Jacumba has not been prepared, and the Proposed Project boundary does not overlie a Historic District. Therefore, the Proposed Project would have **less than significant**

impacts related to compliance with applicable goals, policies, or requirements of an applicable County Community Plan, Subregional Plan, or Historic District's zoning.

### Switchyard

The switchyard would be consistent with the visual-resource-related policies of the Mountain Empire Subregional Plan (See Table 2.1-1). As such, impacts would be **less than significant**.

### Threshold 5

*Would the project install outdoor light fixtures that do not conform to the lamp type and shielding requirements described in Section 59.105 (Requirements for Lamp Source and Shielding) and are not otherwise exempted pursuant Section 59.108 or Section 59.109 of the San Diego County Light Pollution Code?*

*Would the project operate Class I or Class III outdoor lighting between 11:00 p.m. and sunrise that is not otherwise exempted pursuant Section 59.108 or Section 59.109 of the San Diego County Light Pollution Code?*

*Would the project generate light trespass that exceeds 0.2-foot-candles measured five feet onto the adjacent property?*

*Would the project install highly reflective building materials, including but not limited to reflective glass and high-gloss surface color that will create daytime glare and be visible from roadways, pedestrian walkways or areas frequently used for outdoor activities on adjacent properties?*

*Would the project not conform to applicable Federal, State or local statute or regulation related to dark skies or glare, including but not limited to the San Diego County Light Pollution Code?*

Use of nighttime lighting during construction would be irregular (construction would primarily occur during daylight hours), and operational lighting sources would be limited to motion-detected lighting at site entrance gates and at the on-site substation. Construction lighting and permanent operational lighting used and installed at the Project site (i.e., at entrance gates and the on-site collector substation) is required to and would be fully compliant with the County's Light Pollution Code and the San Diego County Zoning Ordinance. Therefore, through compliance with existing County regulations and the installation of shielded and downward-directed outdoor lighting fixtures, construction and operational effects to day and nighttime views in the area would be less than significant. Further, the Proposed Project would be compliant with applicable sections of the County Light Pollution Code related to lamp type and shielding requirements, and operation of

Class I or Class II lighting. In addition, operational lighting is not anticipated to exceed the County's light trespass threshold of 0.2 foot-candles measured 5 feet onto adjacent property.

Although the Proposed Project does not propose to install traditional highly reflective building materials, the proposed solar panels would be uniformly dark in color, non-reflective, and designed to be highly absorptive of all light that strikes their glass surfaces. In addition, Proposed Project components, including the on-site substation, inverters, battery energy storage system containers, and the overhead slack span transmission line, would be constructed of steel and/or other metallic materials and depending on daily atmospheric conditions, may be sources of daytime glare.

According to the Glare Study prepared for the Proposed Project (see Appendix B), the 55-degree array tracker rotational limits combined with the 5-degree wake/stow angle of proposed solar panels would cause any potential glare to be redirected above and away from analyzed residential and motorists locations throughout the day and year. Potential glare visible from the proposed solar operations would be limited to the Jacumba Airport Runway 7 approach (i.e., west approach) during the afternoon hours of the winter months lasting for less than 1 hour per day. During the morning hours, the modified wake angle of arrays south of Old Highway 80 would redirect any potential glare up and out of the view of pilots landing on the Runway 7 approach. The exposure of pilot's Proposed-Project-generated glare on the westbound approach to the Jacumba Airport Runway 7 would be limited throughout the year and would be within the range deemed acceptable by the FAA (i.e., "green" hazard level). As such, the Proposed Project and more specifically, Proposed-Project-generated glare, would not substantially affect the daytime views of pilots on the Jacumba Airport Runway 7 approach. Therefore, Proposed-Project-generated glare impacts would be **less than significant**.

Proposed Project components, including inverters, battery energy storage system containers, and overhead slack span transmission line, would be visible from public roads, including I-8 and Carrizo Gorge Road. These components may create daytime glare that could be visible from roadways. As such, impacts would be **potentially significant (Impact AE-10)**.

### Switchyard

Switchyard motion-detected lighting would be mounted near the entry gate to safely illuminate the switchyard entry. All lighting at the switchyard would be shielded and directed downward to minimize the uplighting and light trespass onto surrounding properties. Lighting installed at the switchyard would be shielded and would be of the minimum intensity necessary to ensure a safe working environment during emergency activities. Therefore, impacts related to lighting and glare would be **less than significant**.

### 2.1.6 Mitigation Measures

- M-AE-1** Inverter enclosures shall be a non-reflective color. If the enclosures are not manufactured as non-reflective, the enclosures shall be painted a non-reflective color.
- M-AE-2** Energy storage containers shall be a non-reflective color. If the containers are not manufactured as non-reflective, the containers shall be painted a non-reflective color.
- M-AE-3** All new transmission line conductors shall be non-reflective in design to reduce conductor visibility and visual contrast.
- M-AE-4:** A minimum set-back of 75 feet from residential property lines to solar panels shall be provided along the western Project boundary. This setback shall be provided where the western Project boundary parallels residential property lines in Jacumba Hot Springs. Setbacks shall be provided pursuant to Section 4800, Setback Regulations, of the County's Zoning Ordinance and shown on Project Plot Plans.
- M-AE-5** Landscaping shall be installed to provide visual screening of the solar facility. The proposed rows of landscaping will be approximately 15 feet wide and will include drought tolerant trees (approximately 18 feet tall 10 years after planting) with native and/or drought tolerant shrubs and ground covers incorporated in between the fence line and the existing road and utility easements. As identified on the Project Conceptual Landscape Plan, landscaping shall be installed and shall run parallel to segments of the Project perimeter fence in the following specified sections: along the north and south sides of Old Highway 80 for entire length of the solar facility; along the east side of Carrizo Gorge Road; and along the southwestern portion of the solar facility adjacent to the community of Jacumba Hot Springs. The applicant shall prepare the Landscape Plans using the Landscape Documentation Package and pay all applicable review fees. Prior to approval of any plan, issuance of any permit, and prior to use of the premises in reliance of this permit, the Landscape Documentation Package shall be prepared and approved. Prior to any occupancy, final grading release, or use of the premises in reliance of this permit, the landscaping shall be installed. The applicant shall submit to the [PDS LA, PCC], a Landscape Certificate of Completion from the project California licensed Landscape Architect, Architect, or Civil Engineer, that all landscaping has been installed as shown on the approved Landscape Documentation Package. The applicant shall prepare the Landscape Certificate of Completion using the Landscape Certificate of Completion Checklist. Landscaping shall be planted and maintained accordingly to ensure continued screening of proposed solar panels by the Applicant and/or Project operator over the operational life of the Project.

**M-AE-6:** As identified on the Project Plot Plans, tan-colored slats shall be installed along specific segments of the Project perimeter fence in the following specified sections: along the north and south sides of Old Highway 80 for entire length of solar facility; east side of Carrizo Gorge Road; and along the southwestern portion of the solar facilities adjacent to the community of Jacumba Hot Springs. Slats shall be maintained accordingly over the operational life of the Project. Slats shall be replaced as needed to ensure a unified and orderly appearance and to provide continued screening of Project components.

### 2.1.7 Conclusion

#### Threshold 1 - Existing Visual Character and/or Quality

The characteristics of the Proposed Project would conflict with the established character of the Jacumba Hot Springs community (**Impact AE-1**). With implementation of mitigation measures **M-AE-1** (non-reflective inverters), **M-AE-2** (nonreflective energy storage containers), **M-AE-3** (nonreflective transmission line), **M-AE-4** (residential properties setback), **M-AE-5** (landscaping), **M-AE-6** (fence slats), impacts would be reduced but not to a less than significant level. . Since feasible mitigation measures have not been identified that would further reduce anticipated theme, style, size, scale, massing, and color contrasts resulting from the Proposed Project, **Impact AE-1** would remain **significant and unavoidable**.

#### Threshold 2 - Valued Visual Character of Community

The introduction of visually prominent Proposed Project components, including approximately 300,000 solar panels, would substantially change the quality of existing views across the site. Further, the proposed solar facility development would conflict with the small-town character of Jacumba Hot Springs and the open, unencumbered characteristics of the Project site (**Impact AE-2**). With implementation of mitigation measures **M-AE-4** (residential properties setback), **M-AE-5** (landscaping), **M-AE-6** (fence slats), impacts would be reduced but not to a less than significant level. Since feasible measures have not been identified to that would further reduce anticipated visual change and effects to existing visual character, **Impact AE-2** would remain **significant and unavoidable**.

#### Threshold 3 - Panoramic or Focal Vistas

Due to the wide distribution of solar panels within the 643-acre solar facility, the Proposed Project would substantially reduce the quality of existing views toward the solar facility from I-8 (**Impact AE-3**), Old Highway 80 (**Impact AE-4**), Jacumba Community Park (**Impact AE-5**), Anza-Borrego Desert State Park (**Impact AE-6**), Round Mountain (**Impact AE-7**), Airport Mesa (**Impact AE-8**), and Table Mountain and the nearby mesa to the south (**Impact AE-9**). With implementation of mitigation measures **M-AE-1** (non-reflective inverters), **M-AE-2** (nonreflective energy storage containers), **M-AE-3** (nonreflective transmission line), **M-AE-4**

(residential properties setback), **M-AE-5** (landscaping), **M-AE-6** (fence slats), impacts would be reduced but not to a less than significant level. Since feasible mitigation measures have not been identified that would further reduce impacts to panoramic or focal vistas, **Impacts AE-2 thru AE-9** would remain **significant and unavoidable**.

#### **Threshold 4 – Applicable Plans and Policies**

The Proposed Project would have **less than significant impacts** related to compliance with applicable goals, policies or requirements of an applicable County Community Plan, Subregional Plan, or Historic District's zoning.

#### **Threshold 5 - Light and Glare**

Lighting and Project-generated glare to the airport would be **less than significant**.

Project components may create daytime glare that could be visible from roadways (**Impact AE-10**). As such, impacts are considered potentially significant. However, with implementation of mitigation measures **M-AE-1** (nonreflective inverters), **M-AE-2** (nonreflective energy storage containers), and **M-AE-3** (nonreflective transmission line), potential glare associated with inverters, battery energy storage system containers, and the overhead slack span transmission line would be reduced to a **less than significant** level.

#### **Cumulative Impacts**

The Proposed Project would result in **cumulatively considerable impact (Impact AE-CU-1)** on the valued visual character or image of neighborhoods, communities, or localized areas. With implementation of mitigation measures **M-AE-1** (non-reflective inverters), **M-AE-2** (nonreflective energy storage containers), **M-AE-3** (nonreflective transmission line), impacts would be reduced but not to a less than significant level. Thus, **Impact AE-CU-1** would remain **significant and unavoidable**.

Combined with the existing East County Substation, and Jacumba Solar projects, the Proposed Project **would contribute to a cumulatively considerable impact (Impact AE CU-2)** to the panoramic vista available from elevated vantage points in the Airport Mesa and Table Mountain RMZs. With implementation of mitigation measures **M-AE-1** (non-reflective inverters), **M-AE-2** (nonreflective energy storage containers), **M-AE-3** (nonreflective transmission line) , impacts would be reduced but not to a less than significant level. Thus, **Impact AE-CU-2** would remain **significant and unavoidable**.

Cumulative impacts to applicable plans and policies, and light and glare would **not be cumulatively considerable**.



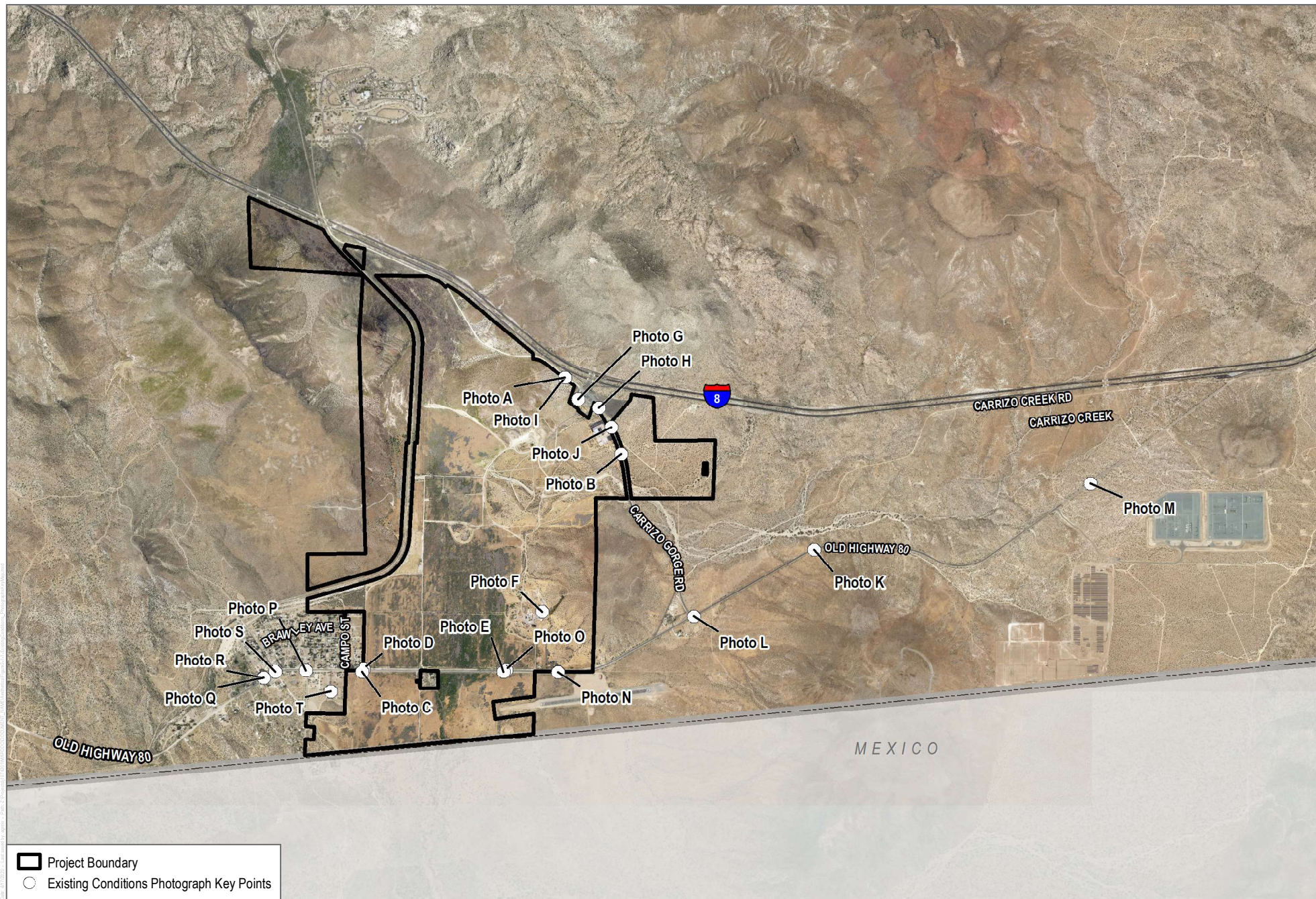
**Table 2.1-1**  
**Mountain Empire Subregional Plan Consistency Analysis – JVR Energy Park**

Policy and Recommendation	Proposed Project Consistency with Policy
<p><b>Land Use – General Goal</b>  <b>(Policy and Recommendation 1)</b>  The landforms of the Subregion are an important environmental resource that should be respected in new development. Hillside grading shall be minimized and designed to blend in with the existing natural contours.</p>	<p><b>Consistent.</b> The solar facility (i.e., all components of the JVR Energy Park Project) would be consistent with this policy. The general topography within the development footprint consists of flat land and gently rolling hills. Grading will be necessary for the construction of access and service roads and the installation of solar arrays; trenching for the underground electrical DC and AC collection system, including the telecommunication lines; and construction of the Proposed Project substation. Major Grading Permits would be required and would be obtained once grading quantities are finalized. Grading is expected to be balanced on site, with approximately 75,000 cubic yards of cut redistributed across the site. Hillside grading would be minimized and designed to conform to the existing contours to the extent feasible.</p>
<p><b>Conservation – Environmental Resources</b>  <b>(Policy and Recommendation 4)</b>  The dark night sky is a significant resource for the Subregion and appropriate steps shall be taken to preserve it.</p>	<p><b>Consistent.</b> The solar facility would be consistent with this policy and. would comply with the County's Light Pollution Code during construction and operations. More specifically, during construction, portable night lighting used during construction would be fully compliant with the lamp type and shielding requirements for Class II lighting as established by Section 51.204 of the County Light Pollution Code and would be fully shielded and directed downward to minimize opportunities for unnecessary sky glow and light trespass. During operations, all lighting for the solar facility would be shielded, directed downward, and would comply with the County of San Diego Light Pollution Code, also known as the Dark Sky Ordinance, Section 59.101 et seq. Lastly, the Proposed Project would comply with the San Diego County Zoning Ordinance, Performance Standards Sections 6320, 6322, and 6324, which guide performance standards for glare, and control excessive, or unnecessary outdoor light emissions.</p>
<p><b>Conservation – Environmental Resources</b>  <b>(Policy and Recommendation 5)</b>  Development shall not adversely affect the habitat of sensitive plant and wildlife species or those areas of significant scenic value.</p>	<p><b>Consistent.</b> As discussed in Section 2.3, Biological Resources, of the EIR, the solar facility would result in impacts to sensitive plant and wildlife species. However, through mitigation, potentially significant impacts would be reduced to less than significant.</p> <p>Although implementation of the Proposed Project was determined to result in significant and unmitigable impacts to focal or panoramic vistas from several locations including Interstate (I) 8 and Old Highway 80, the Proposed Project would not conflict with this policy. Neither the Project site nor the surrounding area has been designated by local, state or federal agencies or organizations as containing or being of "significant" scenic value. Still, the areas identified for solar development encompass flatter terrain and unique or particularly vivid terrain including ridgelines and slopes would not be disturbed by Proposed Project development.</p> <p>Within implementation of landscaping and slatted fencing, solar panels, and other equipment would be screened from public view of motorists on Old Highway 80, users of Jacumba Community Park, and residents in Jacumba Hot Springs to the extent practicable. From elevated vantage points, taller Proposed Project components associated with the collector substation, switchyard, and gen-tie line would be visible but would be added to a viewshed that currently includes tall steel lattice towers and tubular steel poles of the Southwest Powerlink and Sunrise Powerlink. Lastly, the Proposed Project is proposed in the Jacumba area landscape that has been previously altered by the existing transmission lines</p>

**Table 2.1-1**  
**Mountain Empire Subregional Plan Consistency Analysis – JVR Energy Park**

Policy and Recommendation	Proposed Project Consistency with Policy
	<p>Since the Project site has not been designated or described by agencies as containing “significant” scenic value, and in consideration of the factors described above, the Proposed Project would not conflict with this policy.</p>
<p><b>Scenic Highways Goal.</b> Establish a network of scenic highway corridors within which scenic, historical and recreational resources are protected and enhanced.</p>	<p><b>Consistent.</b> Within the Mountain Empire Subregional Plan Area, I-8 from State Route 79 east to the Imperial County Line and Old Highway 80, from the Central Mountain Subregion to I-8 are designated scenic corridors. The solar facility would be visible from portions of I-8 and Old Highway 80.</p> <p>Despite their inclusion in the County’s scenic highway system, there are no current local regulations governing development of lands along I-8 or Old Highway 80. For example, existing energy infrastructure including the East County Substation, Jacumba Solar Project, transmission lines, and the East County Substation 138-kilovolt (kV) line is currently visible from I-8 and Old Highway 80.</p> <p>Near the Project site, both I-8 and Old Highway 80 were identified as providing opportunities for long and/or broad scenic views. However, the duration of available views from I-8 to the Project site is brief (30 seconds or less) and the viewshed currently encompasses gas station development and electrical infrastructure in addition to natural terrain and native desert vegetation. The installation of landscaping and slatted fencing would partially screen solar panels and interior Proposed Project components from view of passing motorists, which would substantially reduce the visibility of solar panels and ancillary facilities from Old Highway 80.</p> <p>Lastly, implementation and operation of the JVR Energy Park Project would not prevent the County from continuing to establish and designate scenic highways and would not inhibit the County from establishing regulations and/or development standards geared toward the protection and enhancement of scenic highways.</p> <p>Due to the inclusion of existing energy infrastructure in the I-8 and Old Highway 80 viewsheds, the brief duration of views to the Project site from I-8, screening of solar panels from view of Old Highway 80 motorists and because the Proposed Project does not inhibit the County from establishing regulations and/or development standards geared toward the protection and enhancement of scenic highways, the JVR Energy Park Project would not be inconsistent with the Scenic Highways Goal of the Mountain Empire Subregional Plan.</p>





**FIGURE 2.1-1**  
**Existing Conditions Photographs Key Map**  
 JVR Energy Park Project EIR



INTENTIONALLY LEFT BLANK



**Photograph A**  
View south from Carrizo Gorge Road (dirt) across Project Site



**Photograph B**  
View east from Carrizo Gorge Road to northeastern portion of Project Site



**Photograph C**  
View southeast from Old Highway 80 across southern portion of Project Site



**Photograph D**  
View northeast from Laguna Street to western boundary of Project Site

SOURCE: Dudek 2018

INTENTIONALLY LEFT BLANK



**Photograph E**  
View north from Old Highway 80 towards ranch property and structures



**Photograph F**  
View east from Project Site towards abandoned ranch structures and residences



**Photograph G**  
View southwest from Jacumba Chevron towards fencing and transmission infrastructure on Project Site

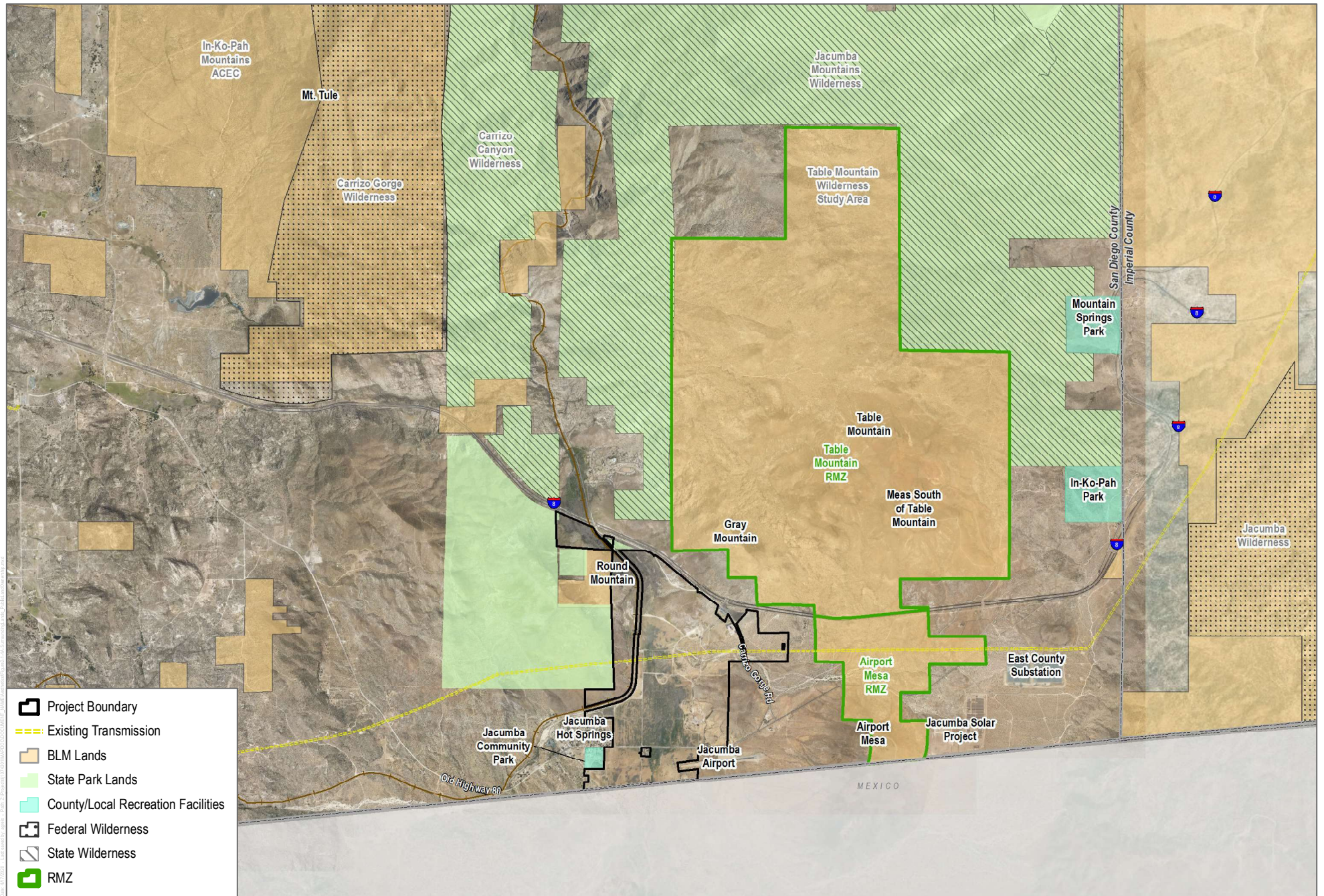


**Photograph H**  
View south from Carrizo Gorge Road to transmission line crossing near Project Site

SOURCE: Dudek 2018

INTENTIONALLY LEFT BLANK





SOURCE: SANGIS 2017, 2020

**DUDEK**



0 1 2 Miles

**FIGURE 2.1-4A**  
Surrounding Lands and Public Lands Ownership in Vicinity

JVR Energy Park Project EIR



INTENTIONALLY LEFT BLANK



**Photograph I**  
View east from Carrizo Gorge Road (dirt) towards gas station development



**Photograph J**  
View north from Carrizo Gorge Road (paved) towards parking lot, I-8 and rocky mountain terrain



**Photograph K**  
View northwest from Old Highway 80 towards Project Site (approx. 0.5 mile away)



**Photograph L**  
View west from Old Highway 80 at Carrizo Gorge Road towards rural residential development

SOURCE: Dudek 2018

INTENTIONALLY LEFT BLANK



**Photograph M**

View southeast from Old Highway 80 towards Jacumba Airport, Airport Mesa, and international border fence



**Photograph N**

View southeast from Old Highway 80 towards East County Substation



**Photograph O**

View northwest from Old Highway 80 across Project Site and towards Round Mountain and mesa landform to the west



**Photograph P**

View east from Old Highway 80 towards residential development north of the highway

SOURCE: Dudek 2015, 2018, 2019

INTENTIONALLY LEFT BLANK





Photograph Q

View south from Old Highway 80 at Jacumba Street towards residential development



Photograph R

View southeast from Old Highway 80 towards active commercial development



Photograph S

View northeast from Old Highway 80 towards vacant commercial structures

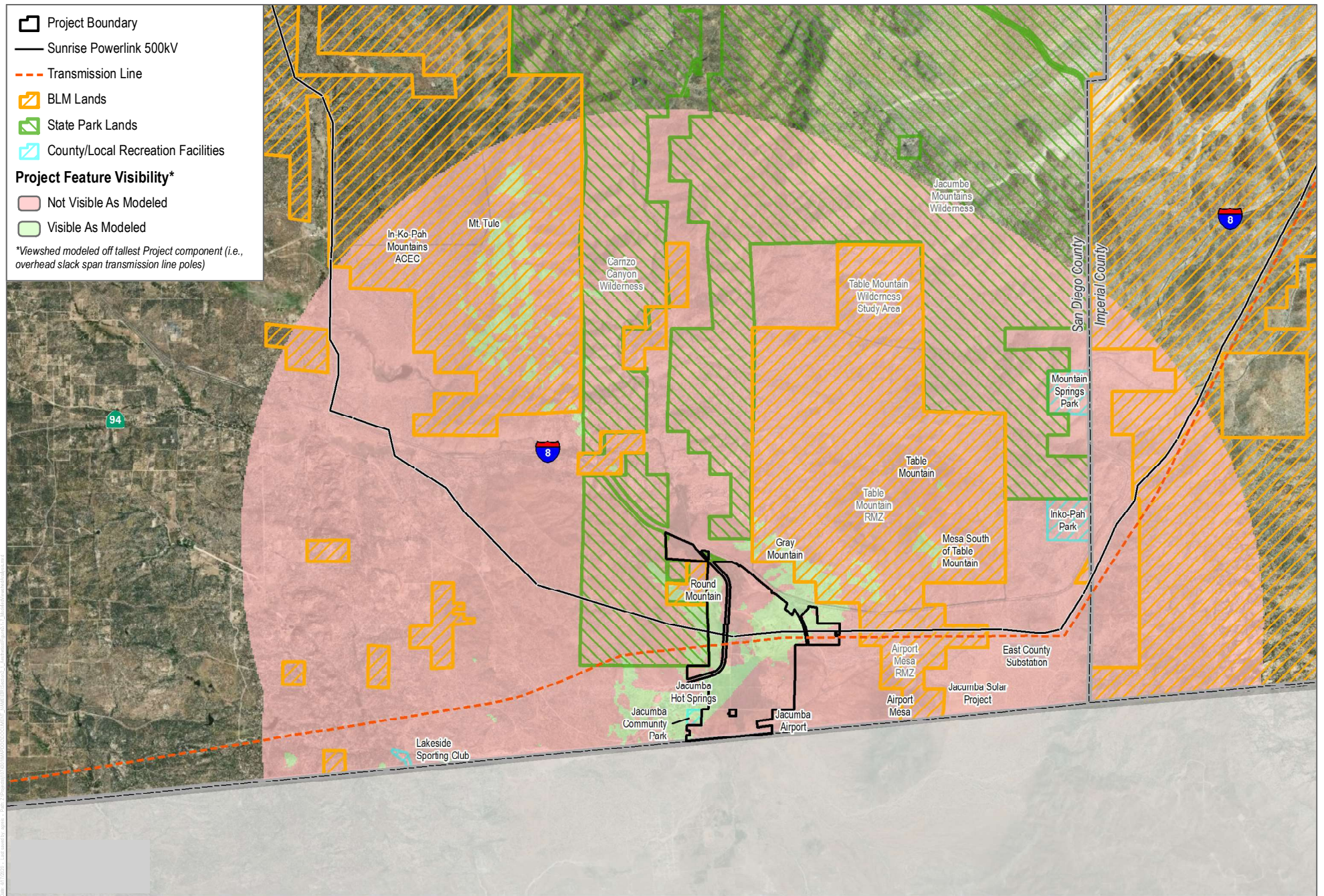


Photograph T

View of recreational facilities offered at Jacumba Community Park

INTENTIONALLY LEFT BLANK





SOURCE: BLM 2019; SANGIS 2017, 2020



INTENTIONALLY LEFT BLANK

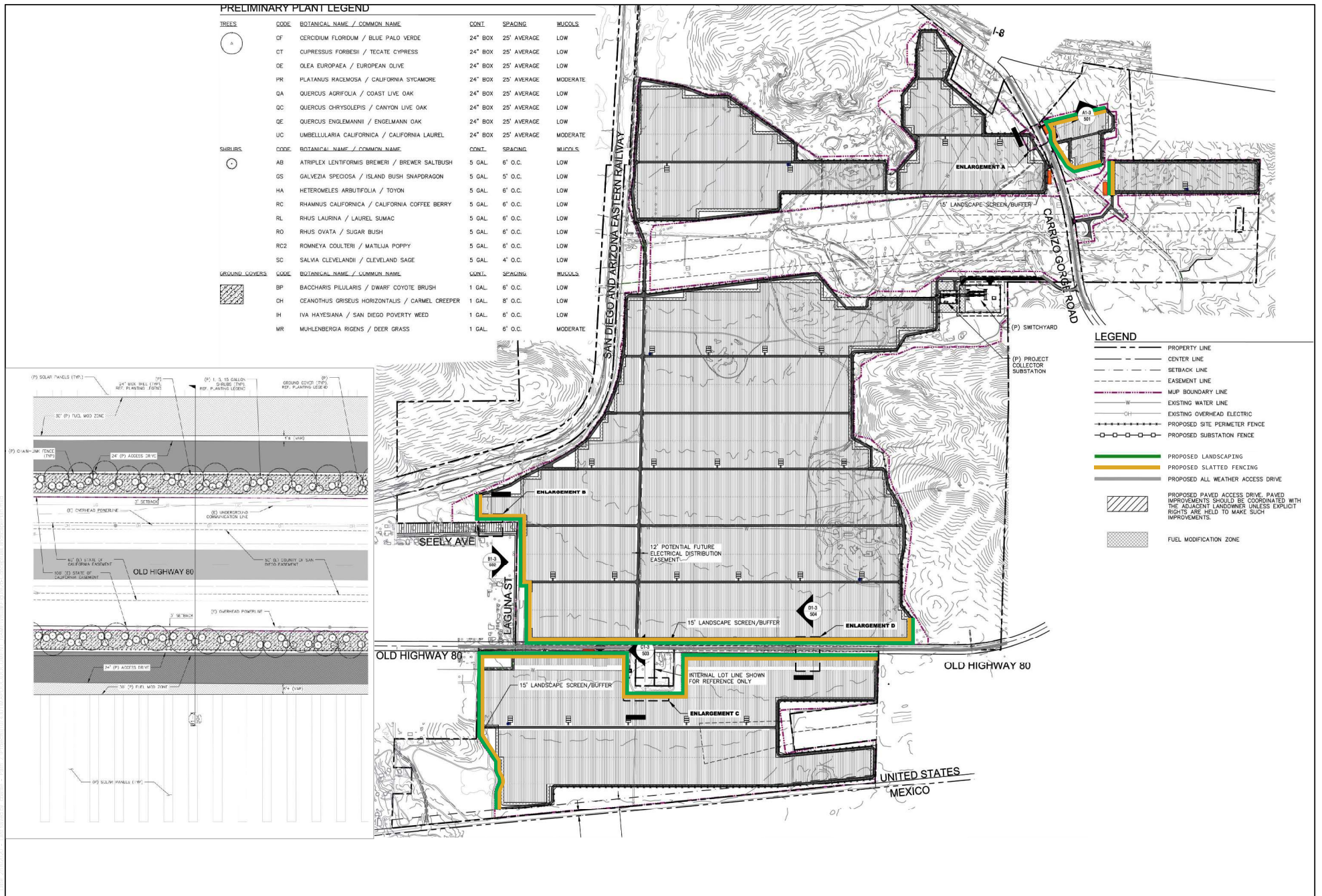
DUDEK



JVR Energy Park Project EIR

INTENTIONALLY LEFT BLANK





SOURCE: BayWa r.e. 2019

INTENTIONALLY LEFT BLANK





Existing View South from Eastbound I-8 at Carrizo Gorge Road Offramp



Visual Simulation of the Project



INTENTIONALLY LEFT BLANK





Existing View North from Carrizo Gorge Road (approx. 0.5 mile North of Old Highway 80)



Visual Simulation of the Project



INTENTIONALLY LEFT BLANK





Existing View Southeast from Old Highway 80 at Laguna Street



Visual Simulation of the Project



INTENTIONALLY LEFT BLANK





Existing View East from Jacumba Valley Park



Visual Simulation of the Project



INTENTIONALLY LEFT BLANK





Existing View Northwest from Old Highway 80



Visual Simulation of the Project



INTENTIONALLY LEFT BLANK





Existing View East from Undeveloped Brawley Avenue Property



Visual Simulation of the Project



INTENTIONALLY LEFT BLANK





Existing View Southeast from State Park Lands Adjacent to Project Site



Visual Simulation of the Project



INTENTIONALLY LEFT BLANK





Existing View West from Airport Mesa



Visual Simulation of the Project



INTENTIONALLY LEFT BLANK





Existing View Southwest from mesa landform south of Table Mountain



Visual Simulation of the Project



INTENTIONALLY LEFT BLANK