URS

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January 22, 2010

Mr. Christopher Meyer
Project Manager
Attn: Docket No. 08-AFC-5
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

Subject: SES Solar Two (08-AFC-5)
Corridor Conflict Analysis
URS Project No. 27657103.00200

Dear Mr. Meyer:

On behalf of SES Solar Two, LLC, URS Corporation Americas (URS) hereby submits the Juan Bautista de Anza National Historic Trail Visual Impact Analysis (VIA).

I certify under penalty of perjury that the foregoing is true, correct, and complete to the best of my knowledge. I also certify that I am authorized to submit on behalf of SES Solar Two, LLC.

Sincerely,

Angela Leiba
Project Manager

AL: ml

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R E P O R T

SES SOLAR TWO - ANZA TRAIL VISUAL IMPACT ANALYSIS

Prepared for

SES Solar Two, LLC
2920 E. Camelback Road, Suite 150
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URS Project No. 27657102.00420

Seth Hopkins
Environmental Planner/Visual Resources Specialist

January 21, 2010

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January 21, 2010

Steven D. Ross, AICP
Outdoor Recreation Planner
Juan Bautista de Anza National Historic Trail
1111 Jackson Street, Suite 700
Oakland, CA 94607

Subject: Project
URS Project No. 27657102.00420

Dear Mr. Ross:

URS Corporation Americas (URS) has been contracted to support a technical study assessing the visual impacts to the Juan Bautista de Anza National Historic Trail for the National Park Service and BLM for the Solar Two Project. URS hereby submits this Visual Impact Analysis (VIA) for the Project.

Sincerely,

URS CORPORATION

Angela Leiba, Vice President
URS Visual Resources Lead

Seth L. Hopkins
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Figures

3D	three-dimensional
ACEC	Area of Critical Environmental Concern
AFC	Application for Certification
BLM	Bureau of Land Management
CADD	computer-aided drafting and design
CEC	California Energy Commission
DEM	Digital Elevation Model
GIS	geographical information system
I-8	Interstate 8
KOP	Key Observation Point
LORS	laws, ordinances, regulations, and standards
NEPA	National Environmental Policy Act
NPS	National Park Service
OHV	Off-highway Vehicle
Project	Solar Two Project
ROW	Right of Way
trail	Current open BLM trail routes
Trail	Historic Juan Bautista de Anza Trail
VRM	Visual Resource Management

SECTION 1 INTRODUCTION

1.1 BACKGROUND

The Juan Bautista de Anza National Historic Trail (Anza Trail or Trail) was designated by Congress in 1990 and is administered by the National Park Service (NPS). The Trail commemorates the story of the 1775-1776 Spanish Expedition whose members experienced this overland route on their trek to northern California. They founded and established the Mission and Presidio of San Francisco, the Mission in Santa Clara and the Pueblo of San José. Most settled in what is today the San Francisco Bay Area.

The Anza Trail approximates the route followed by the Anza expedition of 1775-76 which brought approximately 300 settlers, 1,000 head of livestock and other supplies north from Mexico to the San Francisco Bay Area. The expedition marks a critical early milestone in California's settlement by Europeans of Spanish descent. However, the Anza Trail is made up of routes that the Native peoples of California had been traveling for centuries; and the success of the Spanish expedition was largely due to the local knowledge of these people and the aid they provided to the settlers in their journey north. The Anza Trail Corridor contains many archaeological and cultural sites providing information and insight into the history of the life of these people.

The Spanish expedition to start a mission in San Francisco was led by Captain Juan Bautista de Anza, commander of the presidio at Tubac, Arizona, son of a Sonora presidio commander, who proposed to establish an overland route to the Bay Area. Accompanying him were missionaries Pedro Font and Francisco Garcés. The Trail spans approximately 1,800 miles between Mexico and San Francisco (1,200 miles in the U.S.). Due to the meticulous records kept by Anza, Font, and Garcés the historic campsites and resources along the Trail were recorded and can now be visited for recreation and tourism by following the Anza Trail. The NPS has mapped an Auto Tour Route on highways that generally parallel the Anza Trail Corridor followed by the expedition. In addition, NPS is partnering with agencies throughout the entire trail alignment to map and sign a recreational trail from Nogales, Mexico to San Francisco. With the assistance of the Mexican government, the Trail may eventually also be identified in that country. The signed recreational trail exists in some areas but its completion is a long term project.

The proposed Solar Two Project site is located along a portion of the Anza Trail Corridor and the signed recreational trail, just north of the US/Mexico border. Several historic sites are near the proposed Project site, both to the north and south, and include mainly recorded historic expedition campsites 47 and 48, and cultural sites such as the Yuha Well and Native American archaeological sites.

1.2 PURPOSE AND NEED

Due to the location of the Solar Two Project (or Project) within the historic corridor of the Anza Trail, it is necessary to assess the potential affect of the Project on the visual resources of the Trail and its value as an important historic and recreational resource. To that purpose, this study will assess the existing condition with regards to scenic quality of the segments of the Anza Trail within sight of the Project, its current use as a recreational resource and impacts to the visual resources contained within and along the Trail Corridor.

This study was requested by the NPS to determine potential significant impacts to the visual resources contained within the Trail Corridor near the Project as part of the joint environmental review being conducted by the BLM and California Energy Commission (CEC) concerning the permitting of the Project at its proposed location. The Anza Trail is currently administered by the NPS, however is located on BLM lands in Imperial County. Therefore, the analysis will be rooted in BLM Visual Resource Management (VRM) policy.

Figure 1, Viewshed Map, displays the location of the proposed Project site, the historic Anza Trail Corridor, historic expedition campsites and locations of character photos taken in the area which are provided as a reference for the reader to evaluate the existing condition of visual resources in this area and the likely effect of the Project on those resources.

SECTION 2 EXISTING SETTING

2.1 PROJECT SITE AND REGIONAL LANDSCAPE SETTING

The Solar Two Project site is located within the Imperial County Ocotillo/Nomirage Planning Area and unincorporated areas of western Imperial County, primarily on BLM lands. The maintained and marked portions of the Anza Trail within sight of the Project are located entirely on lands under BLM jurisdiction. Please see Section 5.13, Visual Resources, of the SES Solar Two Project Application for Certification (08-AFC-5) for further detailed description of the existing regional and Project area setting and Project description.

The Project site and the Anza Trail are also located within the BLM's Yuha Desert Management Area. The Yuha Desert Management Plan was developed to manage recreational and other uses in order to provide for adequate protection of wildlife and cultural resources within the designated Yuha Desert Management Area. The Yuha Desert Management Area covers an approximately 68,300-acre area located in southwestern Imperial County between Old Highway 80 (also known as Even Hewes Highway) and the International Border, just east of the community of Ocotillo. Further, the Anza Trail, as it winds through the Yuha Desert Management Area, extends through the Yuha Basin and the Yuha Basin Area of Critical Environmental Concern (ACEC). The ACEC encompasses the area between Interstate 8 (I-8) and State Highway 98 within the Yuha Desert Management Area.

2.2 ANZA TRAIL SIGNIFICANCE AND SETTING

Within the U.S., the Anza Trail is an approximately 1,200-mile historic route from Nogales, Arizona to San Francisco, California. In 1774, a native Indian guide, Sebastian Taraval, led Captain Juan Bautista de Anza and a small party of men to the Yuha Well. Anza was scouting trade routes from Tubac, Sonora (now Arizona) to northern California, and eventually reached Monterey, California. The following year, Anza again visited the well with his colonizing expedition of approximately 300 soldiers and colonists and 1,000 head of cattle on their route to San Francisco. Various other historic expeditions traversed the area from the southeast to the northwest but were not as well documented.

Within Imperial County and the Project area, the Anza Trail Auto Tour Route extends west from Arizona (largely along I-8 and State Highway 98) to Calexico, where it then turns northward and extends through El Centro to Brawley, before continuing westward along State Route 78 (the historic trail corridor is located south of the Mexican Border between Yuma, Arizona, and Mt. Signal). The portion of the Trail that would have views of the Project is largely between State Highway 98 to the south and north about five miles from Evan Hewes Highway. Within this area, there are two known historic campsites. These campsites are designated as Historic Campsites 47 and 48. Historic Campsite 47 corresponds to the Yuha Well, which is located within the Yuha Basin. The well is clearly marked and is a point of interest along the marked route through the Yuha Desert Management Area.

To the south of the Project site, the Anza Trail is visited by approximately 3,000 hikers, campers and off-highway vehicle (OHV) recreational area users each year. This estimate is derived from vehicle counts supplied by BLM statistics which show 2,641 vehicles at Route 247 and 1,963 vehicles at Route 308, which correspond to vehicle counters at the open marked recreational trail locations. The estimated

number of users is higher than the vehicle counts in order to account for additional passengers and/or hikers. To the north of the Project site, the level of use of the Anza Trail is more difficult to estimate since the vehicle counter is placed at the entrance to the Plaster City Open (OHV) Area. The vehicle counter shows 23,702 vehicles per year at that location. This corresponds to OHV use for various staged races and club events, as well as general OHV use and camping within the Plaster City Open Area. Many of these users may or may not be utilizing the trail and Trail Corridor. However it is assumed that a higher number of recreational area users visit the area to the north of the Project site.

Current recreational trail (or trail) routes differ slightly from the Anza Historic Trail route and both were surveyed for potential visual effects resulting from the proposed Project. For this reason the current open recreational trail route is the focus of the visual analysis. Figure 1, Viewshed Map, shows both the historic Anza Trail route and the current recreational trail route that is maintained and marked by the BLM. This figure identifies several Character Photos which depict the current visual character of the trail and its surroundings as well as the two historic expedition campsites within the viewshed (numbered 47 and 48). The location of the Yuha Well (Historic Campsite 47), is labeled as Character Photo 1, which depicts the current state of the well. Open camping is not currently allowed at this location. Additionally, open camping is not allowed at the historic expedition campsite 48 which is difficult to access and is not located along the current recreational trail route. Character Photo 2 corresponds to a portion of the trail to the south of the Project site. Character Photo 3 corresponds to the furthest approximate distance from the Project of all the photographic depictions and is the only background photograph included in this report. Character Photo 4 shows the condition of the trail to the north of the Project site. There are several open and marked campsites along the recreational trail route which were not used by the Anza expedition, but which provide recreationalists the opportunity for camping. These open camping areas often have views of the Project site, and were surveyed for potential visual effects caused by the Project. It was determined that the current open recreational trail route is most susceptible to views of the Project due to location and elevation, as well as frequency of use.

2.2.1 Existing Setting and Viewshed

Overall, the Solar Two Project site is visible from many locations along the open trail route within the foreground to middleground (within 0 to 5 miles). Several areas of the trail are at lower elevations and are not exposed to views of the Project at all, and views diminish in direct relation to distance from the site as there are no extreme elevations that would render the site more clearly visible at a greater distance. During the visual survey conducted for this study the trail was traversed from south to north. Therefore, the existing setting is described from south to north below.

The Project is not visible from the Trailhead located along State Highway 98. Views of the Project site begin near the Yuha Basin overlook. There is an open campground at this location which would be a likely staging point for hikers or OHV users in the Yuha Desert. Clear, slightly elevated, direct line of sight views to the Project site are available as the trail crests the upper elevations of the Yuha Desert near the Anza Monument site and overlook at the Yuha Geoglyphs. The trail has few intermittent and sporadic views of the Project site as it winds through washes along the northern fringe of the Yuha Basin to the east of the Geoglyphs. These views diminish and become non-existent further south into the Yuha Basin, unless one is standing atop a hillcrest. The Project site is not visible from Yuha Well due to its lower elevation. The trail traverses the desert to the northeast from the Yuha Well and the Project is not visible

for some time before the trail becomes elevated again further north. Character Photo 2 (see Figure 2, Character Photos 1 and 2) represents an area along the trail with views of the site. Views of the Project site are clear and direct at each of the available open camping areas near Dunaway Road which are depicted by Key Observation Point #1 (KOP #1) (see Figure 4, Existing View from KOP#1). On the northern side of the Project site, across Evan Hewes Highway, the Trailhead is marked again just north of Plaster City. Views of the Project site are partially obstructed by the US Gypsum facility at Plaster City but open up as one travels away from this visually dominant feature. The trail follows the Plaster City Railway and remains approximately at the same elevation as the Project site, except for a few wash areas where elevation drops slightly and views of the Project site become unavailable. In general however, views of the Project site are only diminished by distance from the site in the northern direction.

Recreational use of the trail occurs to the north and south of the Project site. Traffic counts at the nearby open space and OHV area, named Plaster City Open Area, adjacent north of the Project site, are approximately 23,700 vehicles per year. This is a good representation of the level of recreational use in these areas. Views to the site from within the OHV area are direct and immediate except where topography of washes obscures horizon line views. Also, the OHV Area is an open space sensitive resource area and considered to have potential for passive recreation activities (see Figure 3, Character Photos 3 and 4). No formal camping has been established in this area but users are known to camp near the Project site, just north of the Evan Hewes Highway immediately east of the Trail Corridor.

The Viewshed for the Anza Trail (see Figure 1, Viewshed Map) represents the area within which the Project could be seen and potentially result in significant effects to visual resources within the Viewshed of the Anza Trail Corridor. The furthest distance at which potentially significant visual effects could occur was identified as approximately five miles. The distance zones used in the analysis were determined by traveling the trail to the north and south of the Project to determine the visibility at varying distances. The methodology for determining the zones was based primarily on BLM VRM system guidelines for distance zones, and the Project description regarding the potential visibility of major Project components (e.g., structures within the Main Services Complex as well as the boundary of the Solar Two Project) from sensitive viewing areas (see Section 3.0 of the Project AFC, Project Description and Location, for a general layout of Project components and for site elevations). The Solar Two Project was reviewed for sensitive resources within the view ranges noted below.

- **Foreground:** 0 to 2 miles from the observer's position. At this distance, the observer can view details of trees, shrubs, wildflowers, and animals and would experience project features as visually dominant features of the visual environment.
- **Middleground:** 2 to 5 miles from the observer's position. At this distance, the observer can see forest stands, natural openings, masses of shrubs, and rock outcrops. The Project features are still dominant but intervening scenery detracts from the attention given to project features.
- **Background:** 5-10 miles from the observer's position. At this distance the texture and form of plants are no longer apparent to the observer, and the observer may or may not notice project features. Intervening topography and vegetation make views to the project less likely.
- **Seldom Seen:** 10 miles to the horizon from the observers' position. At this distance, the observer can view mountain peaks, ridgelines, and patterns of forest stands and openings.

A buffer is applied to the Viewshed Map to allow the reader to see the extent of the foreground and middleground views at the five-mile limit. The Viewshed model was refined to account for local viewing conditions, primarily topographic and vegetative screening. Computer Viewshed analyses were conducted (using 30-meter-grid cell resolution, generated from 1:24,000 Digital Elevation Model [DEM] data from the United States Geological Survey) to map the Viewshed. United States Geological Survey DEM files were imported into an ArcView 9.2-based geographical information system (GIS) using the spatial analysis extension. The combined DEM was used to run Viewshed analyses in Universal Transverse Mercator, Zone 10, North American Datum 83.

For the Solar Two Project, the centroid of the approximately 6,500-acre site was used (at 25 feet above existing grade) to run an existing Viewshed map. Next, a centroid of the Project's tallest structure, the SunCatcher assembly facility at a height of 78 feet, as well as the perimeter/fence line for the entire site, was input and the Viewshed model was rerun. The results represent a "typical" Viewshed for the Project area.

Beyond the mapped Viewshed, the Solar Two Project would be either not visible due to topography/screening, or of such a small size in the background field of view that significant effects would not be expected.

The Viewshed also takes into account the visibility of all proposed industrial development, substation and large transmission lines, as well as the visibility of the Solar Two Project (e.g., the most visible components). Other variables affecting potential visibility of the Project include: orientation of the viewer, duration of view, atmospheric conditions, lighting (daylight versus nighttime), and visual absorption capability (defined as the extent to which the complexity of the landscape can absorb new elements without changing the overall visual character of the area).

The Viewshed was mapped to identify the maximum potential area for significant effects of the Solar Two Project in views from visually sensitive areas. Within the Viewshed, varying levels of Project visibility have been identified. The highest level of Project visibility exists when the viewer is adjacent to the proposed Solar Two Project site, the viewer is permanent and stationary, and there is no screening. Conversely, the lowest level of visibility exists, for example, when the viewer is located at greater distances from the site, traveling at a high rate of speed, and in partially to fully screened conditions.

Character photos of the areas surrounding the proposed Project site (see Figures 2 and 3, Character Photos) depict the existing visual environment of the viewing areas and sensitive visual resources within areas surrounding the Project. Some of these character photos may not have views to the Project; however, they have been included to help describe the visual resources within the region. These photos also help the reader understand the general visual character of the surrounding area and the land uses, as well as historic resources within the Trail Corridor. The results of the Viewshed analysis and the field photo survey indicated that most sensitive viewing areas within the Viewshed were from those areas of the trail immediately adjacent to the proposed Solar Two Project site (foreground viewers), the trail as it nears the southern boundary of the Project and open camping areas to the south of I-8, and to the north of the Project at the Plaster City Open Area.

SECTION 3 SCENIC ASSESSMENT

3.1 BLM SIGNIFICANCE CRITERIA AND IMPACT ASSESSMENT METHODOLOGY

The Anza Trail is administered by the NPS on BLM lands and the Project is located primarily on BLM lands. Therefore, consideration of the Project's potential significant visual impacts to the Anza Trail is based solely on the requirements of the National Environmental Policy Act (NEPA). BLM VRM guidelines were used for this analysis. For a complete explanation of BLM VRM regulations and methodology, please see Section 5.13, Visual Resources, of the Project AFC. Some important points related to this supplementary analysis are discussed further below.

This report includes the assessment of impacts on scenic quality and sensitive viewing areas along the recreational trail or within the historic corridor of the Juan Bautista de Anza National Historic Trail. Visual effects likely to cause significant impacts to the visual environment of the Anza Trail are related to the construction, operation, maintenance, and long-term presence of the Project. Therefore, the methodology used takes into account that the proposed Project would cause long term visual effects to visual resources within the Viewshed of the Anza Trail. The assessment of change to the visual environment and contrast ratings were analyzed accordingly.

3.1.1 BLM Visual Resources Management Classifications for the Anza Trail

The BLM establishes VRM Classifications (Class I, II, III, or IV) to establish visual "values" for BLM managed lands and establish visual resource baseline conditions. VRM is a system designed to minimize the visual impacts of surface-disturbing activities and maintain scenic values of BLM managed lands for the future. The objectives of the management classes are important because the contrast of a project with the existing setting is compared with the management objectives to determine significant effects (see Table 1, Significance Criteria). Individual management classifications are established with the following objectives:

- Class I Objective: To preserve the existing character of the landscape. The level of change to the characteristic landscape should be very low and must not attract attention.
- Class II Objective: To retain the existing character of the landscape. The level of change to the characteristic landscape should be low.
- Class III Objective: To partially retain the existing character of the landscape. The level of change to the characteristic landscape should be moderate.
- Class IV Objective: To provide for management activities which require major modification of the existing character of the landscape. The level of change to the characteristic landscape can be high.

In addition to VRM Classifications, the BLM also establishes scenic quality ratings. Scenic Quality is defined as "a measure of the visual appeal of a tract of land" (BLM, 1986). Scenic quality can be used to describe the existing conditions, the standard for management, or the desired future conditions. The highest scenic quality ratings are assigned to landscapes that have the most variety and most harmonious

composition in relation to the natural landscape. Scenic Quality Ratings are intended to provide a standardized method of developing the intrinsic quality of existing visual resources, as defined below:

- Class A: Areas have outstanding diversity or interest; characteristic features of landform, water, and vegetation are distinctive or unique in relation to the surrounding region. These areas contain considerable variety in form, line, color, and texture.
- Class B: Areas have above-average diversity or interest, providing some variety in form, line, color, and texture. The natural features are not considered rare in the surrounding region but provide adequate visual diversity to be considered valuable.
- Class C: Areas have minimal diversity or interest; representative natural features have limited variation in form, line, color, or texture in the context of the surrounding region. Discordant cultural modifications (*e.g.*, substations, transmission lines, and other cultural modifications) can be highly noticeable, which can reduce the inherent value of the natural setting.

According to the Yuha Desert Management Plan, the Yuha Basin has an established BLM VRM Classification of Class II and a Scenic Quality rating of Class B; and the remainder of the Study area has been assigned to VRM Class III and a Scenic Quality rating of Class C.

3.1.2 BLM Visual Resources Contrast Rating Methodology

The BLM contrast rating system is used to determine potential visual impacts of the proposed Project on the Anza Trail. The BLM has developed the VRM Methodology to identify and quantify scenic values, and to analyze the impacts of proposed landscape modifications. This methodology is used to establish the scenic quality of an area and then to evaluate the degree of contrast between the existing landscape and the proposed action.

The BLM contrast rating process provides a systematic process to analyze the potential visual impact of the Project to the visual setting of the Anza Trail Corridor. A Visual Contrast Rating was performed to systematically analyze potential visual impacts of the proposed Project on the Trail Corridor. In general, the degree to which a project would affect the visual quality of the landscape depends on the visual contrast created between a project and the existing landscape. The contrast can be measured by comparing Project features that would be visible along the Anza Trail Corridor with the features that are currently visible within the landscape. Form, line, color, and texture are used to make this comparison and to describe the visual contrast created by the Project.

Contrast ratings were performed for each of the three KOPs described in Section 4, Impact Analysis, of this report. Section 3.2.3, Key Observation Points, defines and describes the KOPs selected for this analysis. The scenic quality of the existing landscape is characterized according to the VRM Classification provided in the Yuha Desert Management Plan for the area through which the Trail Corridor passes. The post-construction changes to land/water, vegetation, and structures resulting from Project actions are described in terms of form, line, color, and texture, in this report. Figures 4 through 9 depicting existing and simulated views were used to visually display the implementation of the Project and to inform and contribute to the field investigation and the contrast ratings to determine level of significance of impacts to visual resources within the Anza Trail Viewshed.

A tabulation of the average contrast ratings identified on BLM Form 8400-4 (1985) for each of the representative KOPs are presented in abbreviated tables in Section 4, Impact Analysis. The actual forms are included in Appendix A, Visual Contrast Ratings, of this report. Impacts to visual resources are analyzed in Section 4, Impact Analysis, of this report according to the level of contrast likely to occur relative to the Project and VRM Policy for the management of the Anza Trail.

Impacts to visual resources for each KOP are determined by comparing the contrast rating with the established VRM objectives for the Project area. If the Project would not meet the established VRM objectives, then a significant impact to visual resources was identified.

Table 1
Significance Criteria

Visual Resource Contrast Rating				
VRM CLASS	None	Weak	Moderate	Strong
I	None	Significant	Significant	Significant
II	None	Less than Significant	Significant	Significant
III	None	Less than Significant	Less than Significant	Significant
IV	None	None	None	Less than Significant

Source: URS Corporation, 2010.

3.2 VIEWER SENSITIVITY AND SENSITIVE VIEWING AREAS

3.2.1 Viewer Sensitivity

While conducting this study, no attempt was made to model for varying levels of viewer concern with change in their landscape. Because of the difficulty in accounting for every individual's sensitivity level, it was determined that all viewers along the trail would have a high level of concern related to changes occurring in landscapes within the Viewshed. Generally, a viewer's concern level is associated with, but not limited to, the following factors:

- viewing location, orientation of view, and duration of view,
- activity in which the viewer may be engaged (e.g., driving, recreation activities, or bird watching),
- visual acuity related to the intensity of visual detail within a landscape setting,
- state of mind or attitude,
- preconceived expectations related to scenic quality, and
- inherent values related to scenic quality and familiarity within specific landscape settings.

3.2.2 Sensitive Viewing Areas

After discussions with NPS and BLM visual staff, and a review of surrounding land uses, it was determined that sensitive viewing areas within the Viewshed occurred along the Anza Trail and at open campsites supporting recreational uses. The Anza Trail is located north and south of the proposed Project site. Foreground, middleground and background views of the Project would be available to users of the trail, however the Project would not be visible from all parts of the trail within each of these viewing distances and available views to the Project diminish with increasing distance.

Evan Hewes Highway is adjacent to the north of the Project site, and separates the Project site from the Anza Trail to the north, while I-8 separates the Project from the Anza Trail to the south. The Trail passes through the Plaster City OHV area to the north and the Yuha ACEC to the south. Foreground views to the Project site from the trail are direct and immediate. These recreational areas through which the trail passes are utilized by OHV users, campers, and a few avid hikers. Due to the flatness of the desert topography, potential recreational users within these areas and along the trail have open, expansive views of the Project site. While views to the site from these locations during OHV activities will most likely be intermittent since wash areas and other areas of lower elevation have obscured views, views from the OHV recreational areas are considered to include foreground, middle ground and background views.

3.2.3 Key Observation Points

Three KOPs were identified as representative of viewers who would be most susceptible to visual effects within the Trail Corridor as a result of the Solar Two Project. The KOPs, along with the Character Photographs provided in this report serve to provide a representative sample of the existing landscape settings contained within the Viewshed.

KOPs are key viewing locations chosen to be representative of the most visually sensitive areas that would view the Project (see Figures 4 through 9). The KOPs presented below were reviewed and approved by Steven Ross, of the National Park Service, and John Johnson of the BLM. There are other views of the Project site that were considered for KOPs; however, after agency consultation, the KOPs presented below were selected to best represent views from the most sensitive areas, while depicting the Project form varying distances and elevations along the Trail Corridor. Alternative views of the Project site are presented in the Character Photos 1 through 4 (see Figures 2 and 3). The Character Photos provide additional reference points describing the visibility of the Project site from the Trail Corridor. However simulated views were not created and contrast ratings do not specifically correlate to the Character Photos.

The analysis of KOPs included three components: (1) identification and photo-documentation of viewing areas and KOPs; (2) description of Solar Two Project visibility and from KOPs; and (3) Visual Resource Contrast Ratings of Project features on visual resources of each KOP. KOPs were identified based on review of available land use data, field inspection, and discussion with NPS and BLM staff responsible for the evaluation of visual resources.

The main visual interest and/or draw for the area is essentially created by the open expanses of land and the panoramic view of desert and mountains; however, a persistent dust haze, characteristic of the air quality in the area, impairs clarity in distant views on windy days. Viewer sensitivity was considered

high at all KOP locations since all viewers are likely to be engaged in recreational activities and would have a high expectation of visual quality. High-sensitivity viewpoints identified in the study area include identified KOPs as well as any existing camping sites, trail areas and OHV recreational areas with views of the Project area.

Viewer sensitivity is likely to diminish in direct relation to distance from the Project site. Mountain area and other more distant open space/recreational users would experience moderate-to-low sensitivity due to the distance from the Project site of the Peninsular Mountain Ranges and the type of activities carried out in these more distant open space areas. Low-sensitivity viewers include industrial areas and are not evaluated in detail for this study because these areas are considered to be a compatible use with the Project and, therefore, would not result in significant visual effects. Industrial facilities in the area include Plaster City (also known as the U.S. Gypsum plant), which is located on the northern boundary of the Project site.

KOP #1 – Open Campsite along Anza Trail

This image was taken from an existing open camping area located along the Anza Trail approximately 1.15 miles to the south of the Project site (see Figure 1, Viewshed Map, and Figure 4, Existing View from KOP #1). Since KOP #1 has unobscured views to the Solar Two Project site, it was chosen as a representative KOP. The existing visual environment contains foreground views of I-8 and open desert. Middle ground views to the north include various man-made developments; Plaster City, Imperial Lakes SPA, and agricultural development to the east. Middleground views to the west and south include the Yuha Desert, and background Viewshed elements include the Peninsular Mountain Range.

This view represents one of the "worst case" recreational user views from the south. Views of the Project from KOP #1 are proximate foreground views. The Project would be in a direct line of sight of potential viewers with a small amount of topographical interference and the I-8 separating the viewer from the Project site. There is very little vegetation in the intervening distance between KOP #1 and the Project and atmospheric conditions on most occasions would render the Project in full view. Furthermore there is very little spatial contrast or visually dominant landscape features that would detract from the Project within this view. The Project would be highly visible because of the flat, open viewing conditions.

This view is typical of the visual environment in an expansive desert wilderness with some manmade elements. The existing Viewshed has been modified with the presence of existing transmission and telephone lines/poles, on the Solar Two Project site, Plaster City, and the nearby I-8. However, this viewing area is generally characterized by a flat desert form with very little diversity. There is little texture and color variation (mainly from patches of sparse low-lying vegetation), and low contrast of generally mute desert tones. Tertiary gray, tan and brown are the most prevalent hues with light color values and dull chroma. The horizon line is composed of a digitate edge of distant mountains while the I-8 forms a band in the intervening landscape between KOP #1 and the Project. Other line elements include existing transmission lines. Movement occurring in this view is related to traffic on the I-8.

The existing scenery is rated by the BLM as having "poor" Class C scenery. The VRM Class for this area is assigned to VRM Class III.

KOP #2 – Anza Monument and Geoglyphs

The visual environment contains distant views of the mountains and open desert expanses. Background views include Plaster City. In the foreground Yuha Basin appears as a complex group of ravines and washes.

This image was taken from the Anza Monument overlook and Geoglyphs located along the Anza Trail approximately 2.5 miles to the south of the Project site (see Figure 1, Viewshed Map, and Figure 6, Existing View from KOP #2). KOP #2 has partially obscured views to the Solar Two Project site due to topography which descends to the north between this location and I-8. I-8 is not visible within the view and the Project site is partially occluded by intervening topography. This view represents a "worst case" recreational user view from the middleground to the south. The Project would be in a semi-direct line of sight of potential viewers with a small amount of topographical and vegetative interference separating the viewer from the Project site. Atmospheric conditions on most occasions would render the visible Project features in full view. There is some degree of spatial contrast and visually dominant landscape features in the foreground views available at this location that would detract from the attention given to the Project within this view. Visually dominant features at this location include the Geoglyphs, the Anza Monument and the overview of the Yuha Basin. The Project would not be highly visible, however because of the flat, open viewing conditions, viewers might notice the presence of Project features due to the size and scale of the development.

This view is typical of the visual environment in an expansive desert wilderness with some manmade elements. The existing Viewshed has been modified with the presence of existing transmission and telephone lines/poles and Plaster City. However, this viewing area is generally characterized by the more scenic areas of the Yuha Desert form with diversity in landform created by the Yuha Basin which provides complex topographical relief. There is little texture and color variation (mainly from patches of sparse low-lying vegetation). The desert rock and sand provide a medium and relatively uniform rough texture and low contrast of generally mute desert tones. Tertiary gray, tan and brown are the most prevalent hues with light color values and dull chroma. The horizon line is composed of a digitate edge of distant mountains. Other line elements include existing transmission lines. There is very little movement occurring in this view.

The existing scenery is rated by the BLM as having "good" Class B scenery. The Yuha Basin has been assigned to VRM Class II.

KOP #3 – Anza Trail Looking South Towards Project

This image was taken from a location to the north of the Project along the trail approximately 1.0 miles to the north of the Project site (see Figure 1, Viewshed Map, and Figure 8, Existing View from KOP #3). KOP #3 has a slightly obscured view of the Project since Plaster City is located between this site and the Project. However, KOP #3 has mostly unobscured views to the Solar Two Project site and is representative of views available along the trail to the north. The Project would be highly visible because of the flat, open viewing conditions. This view represents one of the "worst case" recreational user views from the north. Views of the Project from KOP #3 are proximate foreground views. The Project would be in a direct line of sight of potential viewers with a small amount of topographical interference separating

the viewer from the Project site. Obstructing features include the structures of Plaster City, and the line feature of Evan Hewes Highway. There is very little vegetation in the intervening distance between KOP #3 and the Project and atmospheric conditions on most occasions would render the Project in partial view. Furthermore there is very little spatial contrast or visually dominant landscape features that would detract from the Project within this view. The Plaster City railroad is one line feature that may visually distract from views of the Project.

This view is typical of the visual environment in an expansive desert wilderness with some manmade elements. The existing Viewshed has been modified with the presence of existing transmission and telephone lines/poles traversing the desert to the north, on the Solar Two Project site, Plaster City, and the nearby Evan Hewes Highway. However, this viewing area is generally characterized by a flat desert form with very little diversity. There is little texture and color variation (mainly from patches of sparse low-lying vegetation), and low contrast of generally mute desert tones. Tertiary gray, tan and brown are the most prevalent hues with light color values and dull chroma. The horizon line is composed of a digitate edge of distant mountains while the I-8 forms a band in the intervening landscape between KOP #3 and the Project. Other line elements include existing transmission lines. Movement occurring in this view is related to traffic on the I-8.

The existing scenery is rated by the BLM as having "poor" Class C scenery and this area is assigned to VRM Class III.

3.2.4 Visual Simulations

A comparison of existing views with visual simulations, depicted in Figures 4 through 9 aided in verifying Project-related effects. The simulations served to present an illustration of how the Solar Two Project may look from specific key viewing locations.

To ensure a high degree of visual accuracy in the visual simulations, computer-aided drafting and design (CADD) equipment, GIS, and the use of a global positioning system allow for life-size modeling within the computer. This translates to using real-world scale and coordinates to locate Project facilities, other site data, and the camera locations corresponding to three-dimensional (3D) simulation viewpoints.

A GIS site map is imported as a background reference. CADD drawings of proposed Project facilities are placed on top of the Project site map in GIS. Locations of sensitive viewing areas are also input into GIS. The camera positioning information is then referenced to the 3D data set. The 3D massing models of both the proposed Project (including ancillary facilities) are generated in real-world coordinates, scaled, and input into GIS.

An electronic camera lens matches the camera lens that was actually used in the field. A Nikon 6.1 megapixels digital camera set to take a 19.2-millimeter lens image was used consistently throughout the process. This lens setting selection allows for viewing of the computer-generated model in the same way that the Solar Two Project would be viewed in the field.

Next, the photograph is imported into the 3D database and loaded as an environment within which the view of the 3D model is generated. To generate the correct view relative to the actual photograph, the electronic camera is placed at a location (within the computer) from where the photograph was taken.

From there, the 3D wire frame model is displayed on top of the existing photo so that proper alignment, scale, angle, and distance can be verified. When all lines of the wire frame model exactly match the photograph, the camera target position is confirmed.

It should be noted that final simulations were created using CADD files obtained from the Project engineer to remain consistent with general Solar Two Project development engineering. Once field KOP location photos and coordinates for photo locations were gathered, these were incorporated into the final simulation production. The processes described above relate to general simulation construction and are included for reader understanding of the procedures.

The visual simulations developed for the Solar Two Project have been designed to be viewed 10 inches from the viewer's eye. This distance will portray the most realistic life-size image from the location of the sensitive viewing area.

3.3 VISUAL EFFECTS OF PROPOSED SOLAR TWO PROJECT

This section discusses the affected visual resources for the Solar Two Project. A description of the potential effects on scenic attractiveness and on sensitive viewers is provided. A detailed description of the Solar Two Project is in Section 3.0, Project Description and Location, of the Project AFC. Table 5.14-4 in the Project AFC describes Major Components, Structures, and Equipment, including design characteristics of some of the more prominent Project features (due to height/size) related to the visual effect assessment.

Visual effects to the surrounding areas are a direct result of the size and scale of the Project. The development will be a newly introduced, highly dominant feature of the landscape. The current open and expansive views existing in the area will be partially occluded by the presence of the Solar Two Project, and existing integrity and continuity of views will be newly defined for many miles of the landscape. Visual Quality is currently moderate to low and the presence of the solar dishes will not diminish visual quality as much as they will affect the character of the visual environment in this area. The new visual environment will no longer evoke the desolate open space that it has historically, but a modern center for the production of renewable energy. Significant impacts to the visual resources within the Viewshed of the Anza Trail are anticipated.

The Project is expected to significantly alter the existing character of the Project site creating significant effects to the general scenic character and quality of the Viewshed area as a whole including views from the Anza Trail. The Solar Two Project would be highly visible from many areas of the trail adjacent to the Project site and for many miles to the north and south. Given the large scale of the Project (approximately 6,500 acres), the lack of significant topographic features and the limited degree of existing landscape modification (e.g., I-8, Plaster City, a substation, transmission lines, and adjacent residences) and/or vegetation within the Viewshed, significant adverse effects on scenic quality are expected; however, landscapes inventoried within the Viewshed are classified as retaining primarily moderate to low visual quality and VRM Classes for areas that would have direct views of the Project site are determined to be VRM Class II and III.

Activities at the Solar Two Project site would occur in areas previously disturbed due to OHV use and limited recreational activities and within areas classified as retaining moderate to low distinctive or

diverse natural amenities or lacking substantial positive cultural modifications. Therefore, significant effects would occur relative to existing scenic quality.

The 100-acre main construction laydown area to the east of Dunaway Road will include construction laydown for the Project site, staff parking, equipment storage, a fueling station, a 25-acre staging area, and construction offices. Construction access to the Solar Two Project site will be from access roads joining Dunaway Road on the east and Evan Hewes Highway on the northwest.

The construction period is expected to last 40 months. The workforce is expected to average roughly 360 construction workers, with 731 workers in the peak month. The workforce is expected to come mainly from the Imperial County area (see Section 5.10, Socioeconomics, of the Project AFC). For a more detailed description of potential sources of visual impacts please see Section 5.13, Visual Resources, of the Project AFC.

Important Project details taken into account as part of the visual effect assessment are listed below.

- Site access would be provided from Dunaway Road and Evan Hewes Highway via new access roads and restrictive gates.
- A security fence (a minimum 10-foot high chain link fence with three strands of barbwire on top) will enclose the entire approximately 6,500-acre Project site.
- The property is largely vacant and undisturbed except for unpaved OHV paths. No structures currently exist on-site.
- The Project would require necessary transmission lines to interconnect to the Imperial Valley Substation. See Section 3.0, Project Description and Location, of the Project AFC.
- Surrounding site development includes Plaster City, property fencing, various farming/residential properties, a large transmission line corridor, an existing substation, a school, and I-8.
- The property is relatively flat, sloping gently down to the southeast but with a small drop off to the west which partially obscures the Project site from residences on the western edge.
- Due to the existing grade of the site, site preparation earthwork includes surface grading to create terracing across the Project site.
- Selected areas would be covered with appropriate material, as conditions require (e.g., asphalt concrete or a soil binder for arterial road paving, and gravel and/or soil binders for other surfaces.

3.3.1.1 Lighting

Lighting will be required for safe and efficient operation of the Solar Two Project. Lighting design for the Solar Two Project would be consistent with CEC lighting requirements and local laws, ordinances, regulations, and standards (LORS). See Section 3.0, Project Description and Location, of the Project AFC for a further description of lighting fixtures.

Currently, the most significant source of nighttime lighting in the area originates from Plaster City. This is a significant source of nighttime lighting; however, it is several miles form some parts of the Project site and the Anza Trail which are currently very dark. Other light sources within the viewshed (the I-8

and external lighting of few residences in the area) contribute little nighttime lighting. The Solar Two Project would add to existing lighting over the Project area which extends to the east, west and south of Plaster City.

It is likely that the Project would significantly increase the existing night lighting in the Project area relative to existing nighttime lighting experienced by Anza Trail users. Overall, the addition of the Solar Two Project is anticipated to create significant night lighting effects from backscatter light and/or night lighting a nearby viewer may experience when looking toward the site from the trail.

3.3.1.2 Glint and Glare

As described in Section 3.0, Project Description and Location, of the Project AFC, SunCatchers focus the sun's rays on a receiver of the Solar Two Project system, which is an insulated cavity used to produce energy, located approximately 12 feet above the reflectors for a maximum height of 45 feet. The SunCatchers are designed so that sun rays from the mirrors would be reflected directly at the receiver and not at surrounding viewers or overhead. Flat glass is attached to corrugated steel backing sheet that is supported by a weldment structure with the desired curvature.

The sun's position in the sky is dependent on the time of day as well as time of year. Because of the way SunCatchers are oriented within the solar field, the amount of rotation during operation each day is minimal, ranging through the course of the year from starting position to noon and then back to starting position. The SunCatchers do not track the sun in the east/west direction, but track based on sun angle above the horizon that varies with the season (higher in summer, lower in winter).

Potential glint and glare effects to viewers along the Anza Trail are anticipated to be infrequent based on the position and orientation of the mirrors on-site. During final design, if design analysis indicates that significant glint and glare effects would occur, potential mitigation should be proposed.

3.3.1.3 Landscaping

Landscaping is included as part of the Solar Two Project; however, a landscaping/screening plan has not been prepared and the extent and location of proposed landscaping is not known at this time. A Landscape/Screening Plan will be prepared during final Project design that may reduce potential visual effects.

SECTION 4 IMPACT ANALYSIS

This Visual Resources Study includes the assessment of impacts on Visual Resources within the Anza Trail Corridor that would arise as a result of the construction, operation, maintenance, and long-term presence of the Solar Two Project.

The severity of the impact was assigned according to the Visual Resource Contrast Ratings at each of the KOPs when compared to the VRM Class for that particular area. This means that the level of impact is proportionate to the amount of anticipated change to the landscape created within a specific viewshed as a function of the management policy assigned for that area. The primary criteria for the contrast caused by Project effects include:

- Visual Resource Elements (e.g., form, line, color, and texture),
- Visual Resource Features (Land/Water Body, Vegetation, Structures
- Spatial and Scale Dominance.

Tables 2 through 4, Visual Contrast Ratings Results, describe the visual resource contrast ratings, designated to each variable above as they relate to the degree of visual effect severity anticipated on representative sensitive viewing areas.

The final evaluation conducted in the impact assessment was the assignment of potential impact levels on representative sensitive viewing areas by combining effect severity levels at key and characteristic viewing locations and VRM Classification objectives according to BLM VRM policy.

4.1 VISUAL IMPACT ASSESSMENT ON SENSITIVE VIEWING AREAS AND VISUAL RESOURCE CONTRAST RATINGS AT KOPS

Figures 4 through 9, depicting existing and simulated views from each selected KOP, aided in verifying Solar Two Project-related effects to visual resources within the Viewshed of the Anza Trail. These three KOPs were identified as representative of viewers who would be most susceptible to visual effects within the Viewshed of the Anza Trail as a result of the Project. The simulations served to present a representative sample of the existing landscape settings contained within the Viewshed, as well as an illustration of how the Project may look from specific key viewing locations. They also aided in assessing the visual contrast rating and establishing impact significance. Table 5, Summary of Impacts, indicates the results of contrast ratings compared with the VRM Class objectives, the anticipated severity of the impact, and resultant significance of the impact, respectively.

The Project has the potential to cause significant visual effects, especially as proximity to the Project increases. Significant visual impacts are anticipated for KOPs #1 and #2 depicted in this report as well as to trail users and other recreationalists on elevated areas to the north and south of the Project site. However, there may be less than significant effects at areas which have partially obscured or nonexistent views of the Project site. These areas exist mainly to the south, since the landscape to the north has much less vertical relief. Both areas have some direct line of sight views of the Project site and the proposed transmission line. The spatial dominance and uncharacteristic nature of the structures and equipment set

the Project in stark contrast to the existing setting. The Project represents a high degree of change to the setting and visual contrast will be obvious.

A description of potential effects for the three KOPs are described below.

KOP #1

KOP #1 will have unobstructed direct views to the Solar Two Project and its structures (see Figures 4 and 5). The Solar Two Project would be highly visible because of the flat, open viewing conditions. Project facilities would alter foreground views from this location by altering form, line, texture and color elements through the introduction of structural features. While the Viewshed has already been modified with the presence of existing transmission lines, the I-8 corridor, industrial development, and property fencing in the immediate vicinity, the Project would represent a spatially dominant element that would be out of character in both size and scale.

Structural form alterations would result from the dimensional mass of the introduced structures, namely the Suncatchers. The shape of Project features make them obvious and will likely demand attention from viewers at this location. The texture at the Project site will become coarse and there will be a sharp edge between the natural desert form and the Suncatchers. The distance to industrial elements will decrease. The color contrast will be less noticeable due to the washed out color of the mirrors which tend to reflect the color of the sky. In general, the Project will create a new wide band line element which stretches almost entirely across the northern boundary of this view. Landform will appear different because vegetation will be removed and the site would be covered by the Suncatcher units.

Persons utilizing wilderness areas generally have an expectation of a high quality visual environment. In addition, potential recreational users at this location are at an elevated foreground viewing position, and would have a direct line-of-site to the Project. This view is consistent with a moderate to high degree of severity for a number of reasons: the number and type of potential viewers (recreational) increases viewer exposure and sensitivity; the distance to the site is small;, and the presence of other industrial features that could distract from views of the Project area is minimal with the I-8 being the primary intervening man-made element. Plaster City is also a prominent manmade feature within this view; however, it will be partially obscured as a result of Project development. As shown in Figure 5, Simulated View from KOP #1, proposed structures would extend across existing horizon lines created by distant mountains and would obscure and/or block panoramic views.

Visual Contrast at this location is characterized as strong (see Table 2, KOP#1 Visual Contrast Rating Results, and Appendix A, Visual Contrast Ratings). The VRM Classification III objectives would not be met and the impact to visual resources at this location is classified as significant (see Table 5, Summary of Impacts).

Table 2
KOP #1 Visual Contrast Rating Results

DEGREE OF CONTRAST		Features											
		Land/Water Body				Vegetation				Structures			
ELEMENTS		Strong	Moderate	Weak	None	Strong	Moderate	Weak	None	Strong	Moderate	Weak	None
	FORM	X				X				X			
	LINE	X				X				X			
	COLOR		X			X				X			
	TEXTURE	X				X				X			

Source: URS Corporation, 2010.

KOP #2

This KOP will have slightly obscured middleground line of sight views to the Solar Two Project and its structures. The Solar Two Project would be partially visible because of the flat, open viewing conditions, however, intervening topography partially occludes the development as it extends east (see Figures 6 and 7). The Project would create a moderate visual contrast to the existing setting and would alter middle ground views by introducing a band of Suncatchers between this location and Plaster City. However, the Project would not obscure distant/panoramic views of the mountains from this KOP (see Figure 7, Simulated View from KOP #2).

Returning recreational area users are generally highly aware of changes to their immediate visual environment. Visible structural form alterations would result from the dimensional mass of the introduced structures, namely the Suncatchers. The shape of Suncatchers and other Project features make them obvious, however due to the distance of this KOP location from the Project site, they are not likely to dominate the attention of viewers, but may attract attention. The texture of the view towards the Project site will not change significantly, however there will be a definable edge between the natural desert form and the band of Suncatchers. The distance to industrial elements will decrease. The color contrast will be less noticeable because the mirrors tend to reflect the color of the sky. In general, the Project will create a new silhouette line element which stretches across a portion of the northern boundary of this view. Desert vegetation would also be removed from view at the Project site.

Persons utilizing the Yuha Desert wilderness at this location will have an expectation of a high quality visual environment. In addition, potential recreational users at this location are at an elevated viewing position, and would have a line-of-site to the Project site. This view is consistent with a moderate degree of severity for a number of reasons: the distance to the site diminishes the level of contrast, other industrial features that could distract from views of the Project area already exist, and the relative size and scale of the development would not dominate the overall visual character. Plaster City is an existing

prominent manmade feature within this view; however, it will be partially obscured as a result of Project development. As shown in Figure 7, Simulated View from KOP #2, proposed structures would extend across existing horizon lines created by distant mountains and would obscure and/or block panoramic views.

The landscape surrounding this KOP is classified as retaining "good" visual quality Class B landscapes and is classified as VRM Class II. It is expected that some direct effects would result from Project development. The Visual Contrast Rating generated by the Project at this location is considered moderate to weak (see Table 3, KOP#2 Visual Contrast Rating Results, and Appendix A, Visual Contrast Ratings). The objective for this VRM Class is to retain the existing character of the landscape. It appears that the contrast rises just to the level of significance, and it could be argued that the impact is less than significant. However, as a viewer travels northeast from this area towards KOP #1, the Project would become more dominant. Thereby, impacts to visual resources from this location are classified as significant (see Table 5, Summary of Impacts).

Table 3
KOP #2 Visual Contrast Rating Results

DEGREE OF CONTRAST		Features											
		Land/Water Body				Vegetation				Structures			
ELEMENTS		Strong	Moderate	Weak	None	Strong	Moderate	Weak	None	Strong	Moderate	Weak	None
	FORM		X					X			X		
	LINE		X				X				X		
	COLOR			X			X					X	
	TEXTURE		X				X				X		

Source: URS Corporation, 2010.

KOP #3

KOP #3 will have semi obstructed foreground views to the Solar Two Project and its structures (see Figures 8 and 9). The Solar Two Project would be highly visible because of the flat, open viewing conditions. Project facilities would alter foreground views from this location by altering form, line, texture and color elements through the introduction of structural features. While the Viewshed has already been modified with the presence of existing transmission lines, Evan Hewes Highway, Plaster City, a railroad, and property fencing in the immediate vicinity, the Project would represent a spatially dominant element that would expand the industrial character of the area in both size and scale.

Structural form alterations would result from the dimensional mass of the introduced structures, namely the Suncatchers. The shape of Project features make them obvious and will likely demand attention from

viewers at this location. The texture at the Project site will become coarser, yet even and ordered due to the rows of Suncatchers, and there will be a sharp edge between the natural desert form and the Suncatchers. The distance to industrial elements is approximately one mile and individual features will be apparent. The color contrast will be less noticeable due to the washed out color of the mirrors which tend to reflect the color of the sky. In general, the Project will create a new wide band line element which stretches almost entirely across the southern boundary of this view. Landform will appear different because vegetation will be removed and the site would be covered by the Suncatcher units.

Potential recreational users at this location are at a level viewing position, and would have direct line-of-site to the Project. Persons utilizing this area are most likely engaged in OHV activities as it is between two designated OHV areas. While park users generally have an expectation of a high quality visual environment, those engaged in these activities may have a shorter duration of view and may not be focused on the Project site.

This view is consistent with a moderate to strong degree of severity because the number and type of potential viewers (recreational) increases viewer exposure and sensitivity and the distance to the site is small. However, the presence of major manmade components of the visual environment such as the railroad, Evan Hewes Highway and Plaster City in the intervening foreground would distract from the features of the Project. As shown in Figure 9, Simulated View from KOP #3, proposed structures would extend across existing horizon lines created by distant mountains but would not overtly obscure and/or block panoramic views.

Visual Contrast at this location is characterized as moderate to strong (see Table 4, KOP#3 Visual Contrast Rating Results, and Appendix A, Visual Contrast Ratings). The VRM Classification III objectives would not be met and the impact to visual resources at this location is classified as significant (see Table 5, Summary of Impacts).

Table 4
KOP #3 Visual Contrast Rating Results

DEGREE OF CONTRAST		Features											
		Land/Water Body				Vegetation				Structures			
ELEMENTS		Strong	Moderate	Weak	None	Strong	Moderate	Weak	None	Strong	Moderate	Weak	None
	FORM		X			X				X			
	LINE		X				X				X		
	COLOR		X				X				X		
	TEXTURE		X			X				X			

Source: URS Corporation, 2010.

4.2 SUMMARY OF SIGNIFICANT IMPACTS TO VISUAL RESOURCES

Overall it is anticipated that the Project would cause significant impacts to the visual resources available to Anza Trail users and the views from the recreational trail and associated recreational areas within the Trail Corridor. The primary cause of visual impacts is the introduction of a spatially dominant, large scale industrial development within the Viewshed of much of the Anza Trail and corridor within a five mile radius of the Project site. Although there are many areas with limited views of surrounding areas due to intervening topography, a major portion of the trail which traverses the Yuha Desert Management Area from the Anza Monument to Dunaway Road, has a clear and direct line of sight view of large portions of the Project area. Impacts do not necessarily affect Class B landscapes, however views of the Project are available from area overlooks and sites within these quality scenic landscapes. According to the BLM VRM Management Class the objectives are to either maintain or to partially maintain the existing character of the landscape. The character of the landscape at several locations located in VRM Class III areas would attract the attention of and may visually dominate the view of the casual observer. The changes do not repeat the basic elements found in the predominant natural features of the characteristic landscape. The Project can also be seen from VRM Class II areas. The VRM objective for these areas is to maintain a low level of change to the characteristic landscape. The Project does not repeat basic elements of the existing landscape and could draw and in some areas dominated the attention of an observer.

In general, through this study, it was determined that the Project would be highly visible and contrast with the existing visual character of the rural desert area in foreground views. Middleground views would be less affected and the Project may or may not cause significant visual impacts depending on the elevation and activity in which the viewer is engaged. The most adverse effects would occur along the trail as it skirts the northern portions of the Yuha Basin to the south of the Project, and for viewers who are stationary at the overlooks or campsites along the trail. In addition the proposed Project would contribute significantly to nighttime lighting effects which could be distracting to campers. The presence of the Project could adversely affect viewers' experience of the existing desolate desert environment and historic nature of the Anza Trail as it currently exists. Therefore, it is determined that the Project would have significant impacts to visual resources within the Viewshed of the Anza Trail Corridor.

Table 5
Summary of Impacts

Viewing Area	Contrast Rating	Meet VRM Objectives?	Visual Impact Severity	Visual Impact Significance
Sensitive Viewing Area and KOP No. 1 (Figures 4 and 5; see also Figure 1 for KOP location) – view from open Campground Anza Trail South.	Strong	No	Moderate/High	Significant
Sensitive Viewing Area and KOP No. 2 (Figures 6 and 7; see also Figure 1 for KOP location) – view from Anza Monument and Geoglyphs.	Moderate/Weak	No	Moderate	Significant

Table 5
Summary of Impacts
(Continued)

Viewing Area	Contrast Rating	Meet VRM Objectives?	Visual Impact Severity	Visual Impact Significance
Sensitive Viewing Area and KOP No. 3 (Figures 8 and 9; see also Figure 1 for KOP location) – view from Anza Trail to north of Project.	Moderate/Strong	No	Moderate	Significant

Source: URS Corporation, 2010.

4.3 CUMULATIVE EFFECTS

The areas within the Anza Trail Corridor Viewshed are generally characterized by distant views of mountains and vast open expanses of desert. Development to the east includes small-scale agricultural/dry-farming and livestock activities, supported by small communities and other sparsely populated areas to the west of the Project site. The size and scale of the Project in conjunction with any other projects of its type, size, or scale, could potentially result in cumulative Project effects on the visual environment.

Currently there are applications for ROWs for solar and wind power facilities in the Project vicinity (see Section 5.18, Cumulative Impacts, of the Project AFC). The areas proposed for solar or wind power facility ROWs (see Figure 5.18-2, Pending BLM Applications Near Project Area, in the Project AFC) in the vicinity of the Project represent a vast swath of land running from the eastern base of the Peninsular Mountains to the outskirts of the town of Seeley. Although there are several projects of predominant size and scale proposed within the Project vicinity, there is not enough information available about their visual appearance to determine the extent of any significant cumulative effect that could be created. If the ROW permits are granted and large-scale solar and wind power facilities are built, there is the potential for significant impacts to the visual resources of the area resulting specifically from the cumulative effects of a succession of intensive development in an area that has historically been left to open space and recreation.

Conversely, the potential for positive cumulative impacts related to the development of these areas as a regional and/or national center for alternative renewable energy exists. Positive visual resource effects could draw tourists, students, and researchers to the area, and appeal to residents who are interested in working in the field of renewable energy.

SECTION 5 MITIGATION MEASURES

The Solar Two Project design inherently precludes mitigation measures for the Anza Trail Corridor. For example, one reason the site location was chosen is because of its proximity to the existing Imperial Valley Substation, the existing transmission line system, and an open expanse of area with very little existing development. By locating the Solar Two Project there, it can be tied into the existing grid via a relatively short transmission line which will parallel the existing Southwest Powerlink line, thereby reducing the visual clutter of the area as best as possible. However, this places the Project within an area utilized by recreationalists. A landscaping plan and fence is not recommended to be included in the final design of the Solar Two Project, for the reason that any increased clutter would not necessarily lower effect severity and may in fact increase the overall visual effect of the Project.

A number of Project features have been designed to help minimize visual effects however. These include, but are not limited to, shielding light sources and using non-reflective materials for Project components other than solar reflector mirrors (see Table 5.14-4, Major Components, Structures, and Equipment, in the Project AFC), and painting equipment and structures in tertiary tones. Although the Solar Two Project includes features that reduce visual effects from the construction/operation of the Project, potentially significant visual effects on adjacent sensitive recreational users may still occur. Suggested VRMMs to reduce potentially significant visual effects to less than significant levels are provided in the Project AFC.

Suggested Mitigation Measures

VRMM 1: To mitigate the Project's visual impacts to the Anza Trail, relocate BLM's signed Anza Recreational Trail to the southerly open vehicle travel route (parallel to Route 274, and Route 346) in the wash which passes the Yuha Well. Because that route follows a wash for more of its length it is lower in elevation and views of the Project site would be blocked by the higher surrounding bluffs.

VRMM 2: To mitigate Project nighttime lighting effects, design and install all permanent exterior lighting such that (a) light fixtures do not cause spill light beyond the Project site; (b) lighting does not cause reflected glare; (c) direct lighting does not illuminate the nighttime sky; (d) illumination of the Project and its immediate vicinity is minimized by including use of motion detectors or other controls to have lights turned off unless needed for security or safety; (e) lighting complies with local policies and ordinances; and (f) use lighting that meets International Dark Sky Association standards, when feasible.

SECTION 6 AGENCIES AND AGENCY CONTACTS

Agencies with jurisdiction to enforce LORS related to visual resources are shown in Table 6, Agency Contact List for LORS.

Table 6
Agency Contact List for LORS

No.	Agency	Contact	Address	Telephone
1	Bureau of Land Management El Centro Field Office	John Johnson	1661 South 4th Street El Centro, CA 92243-2811	760-337-4400
2	National Park Service	Steven D. Ross, AICP, Outdoor Recreation Planner Juan Bautista de Anza National Historic Trail	National Park Service 1111 Jackson Street Suite 700 Oakland, CA 94607	510-817-1400

Source: URS Corporation, 2010.

Note:

LORS = laws, ordinances, regulations, and standards

SECTION 7 REFERENCES

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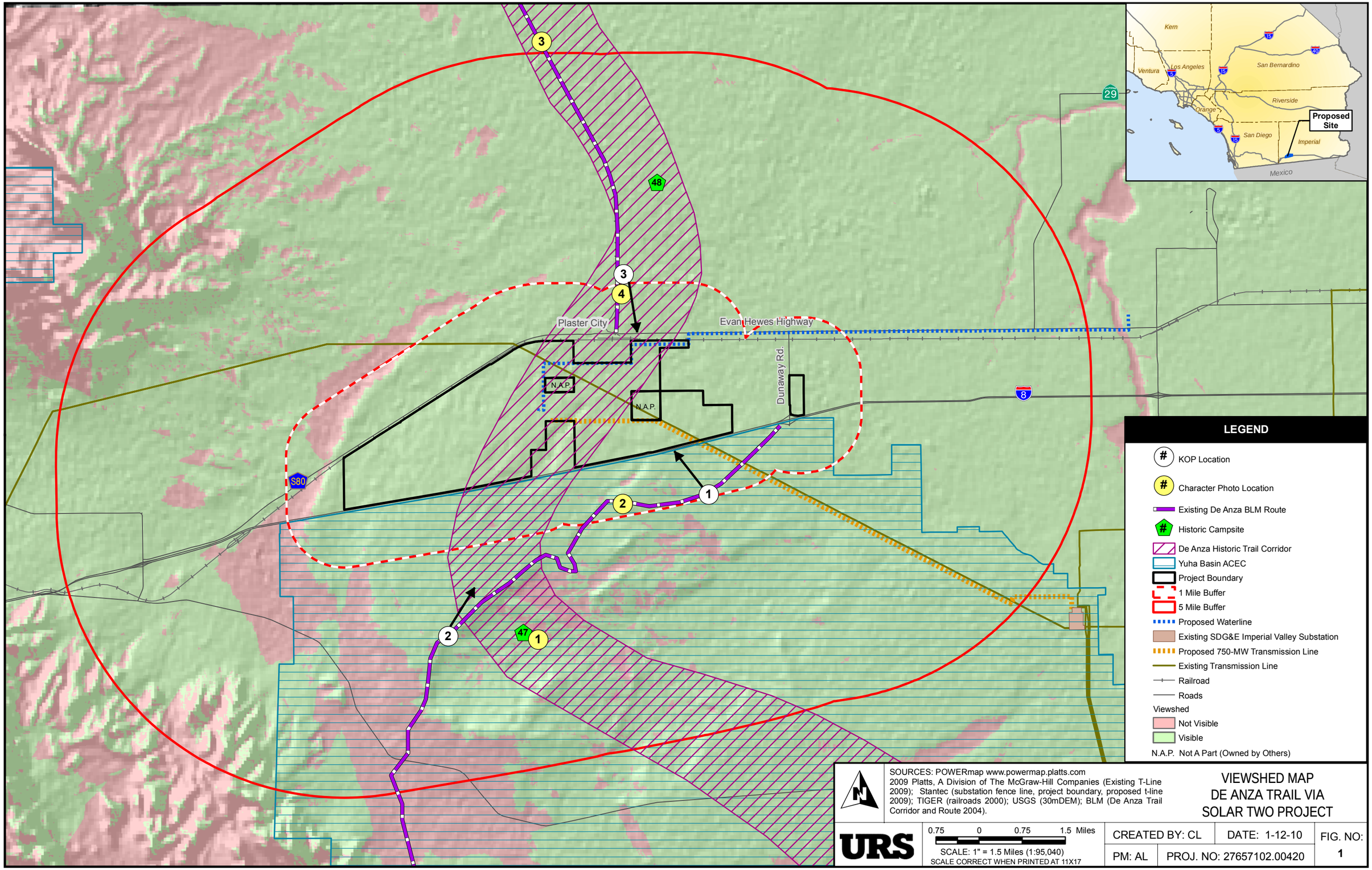


SOURCES: POWERmap www.powermap.platts.com
2009 Platts, A Division of The McGraw-Hill Companies (Existing T-Line 2009); Stantec (substation fence line, project boundary, proposed t-line 2009); TIGER (railroads 2000); USGS (30mDEM); BLM (De Anza Trail Corridor and Route 2004).

VIEWSHED MAP DE ANZA TRAIL VIA SOLAR TWO PROJECT

URS

0.75 0 0.75 1.5 Miles

SCALE: 1" = 1.5 Miles (1:95,040)
SCALE CORRECT WHEN PRINTED AT 11X17

CREATED BY: CL	DATE: 1-12-10	FIG. NO: 1
PM: AL	PROJ. NO: 27657102.00420	

Path: G:\gis\projects\1577\22238980\mxd\DeAnza_VIA_Viewshe.mxd, 01/12/10, camille_lill

Character Photo 1: Photo of Yuha Well and Historic Campsite #47

Character Photo 2: View of Project site from De Anza Trail to the south

CHARACTER PHOTOS
SOLAR TWO – DE ANZA TRAIL VIA
(FIGURE 1 OF 2)

URS	NO SCALE	CREATED BY: AG	DATE: 01-06-10	FIG. NO: 2
		PM: AL	PROJ. NO: 27657102.00420	

Character Photo 3: View of Project site from De Anza Trail to the north along railway

Character Photo 4: View of Project site from De Anza Trail to the north

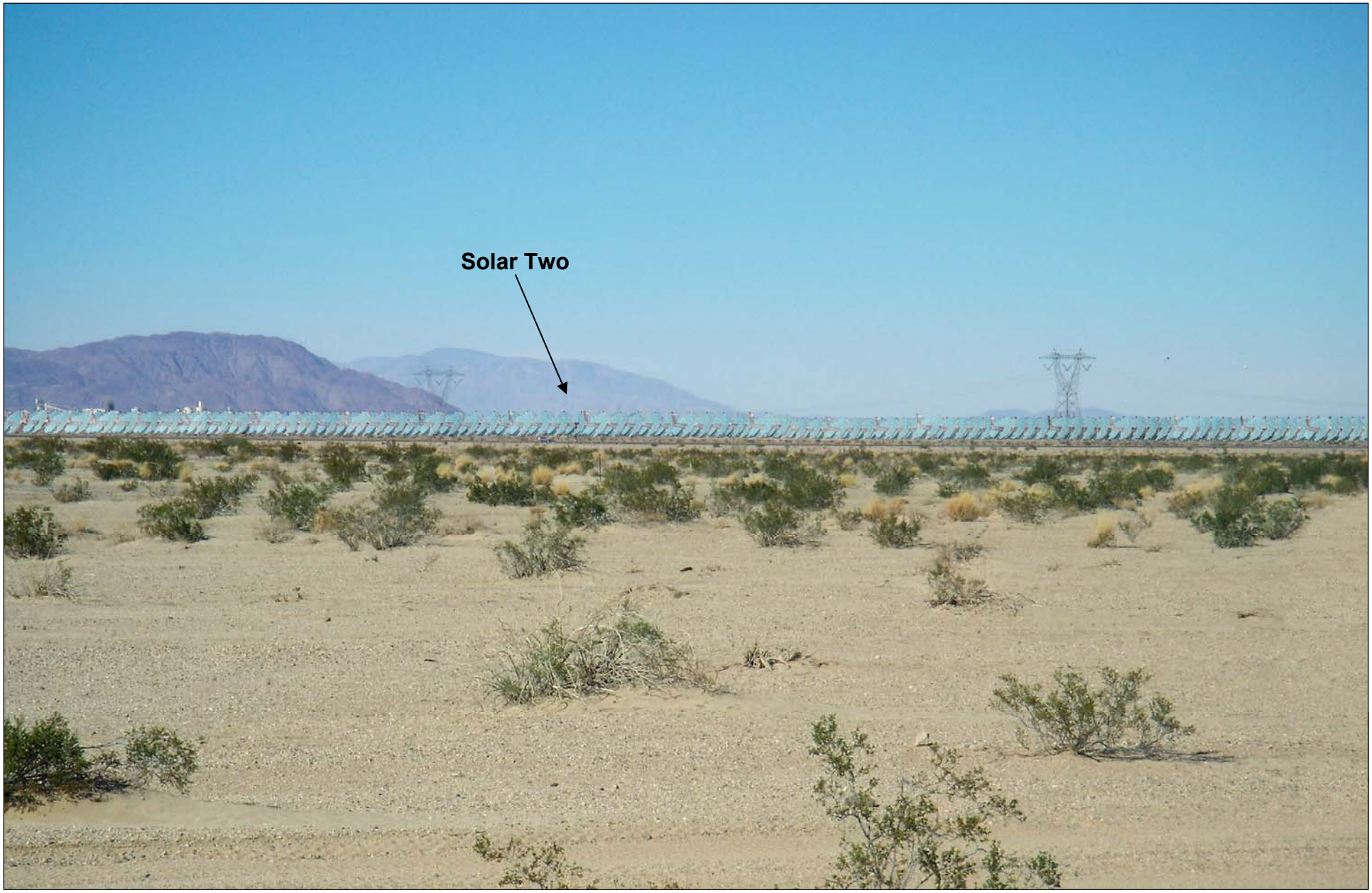
CHARACTER PHOTOS
SOLAR TWO – DE ANZA TRAIL VIA
(FIGURE 2 OF 2)

URS	NO SCALE	CREATED BY: AG	DATE: 01-06-10	FIG. NO: 3
		PM: AL	PROJ. NO: 27657102.00420	

KOP 1: Existing view from BLM designated campsite along De Anza Trail (approximately 1.15 miles south/southeast of Project).

EXISTING VIEW OF PROJECT FROM KOP #1
SOLAR TWO – DE ANZA TRAIL VIA

URS	NO SCALE	CREATED BY: AG	DATE: 01.06.10	FIG. NO: 4
		PM: AL	PROJ. NO: 27657102.00420	



KOP 1: Simulated view from BLM designated campsite along De Anza Trail (approximately 1.15 miles south/southeast of Project). This photo location is meant to represent "worst-case" views from recreational viewers to the south/southeast.

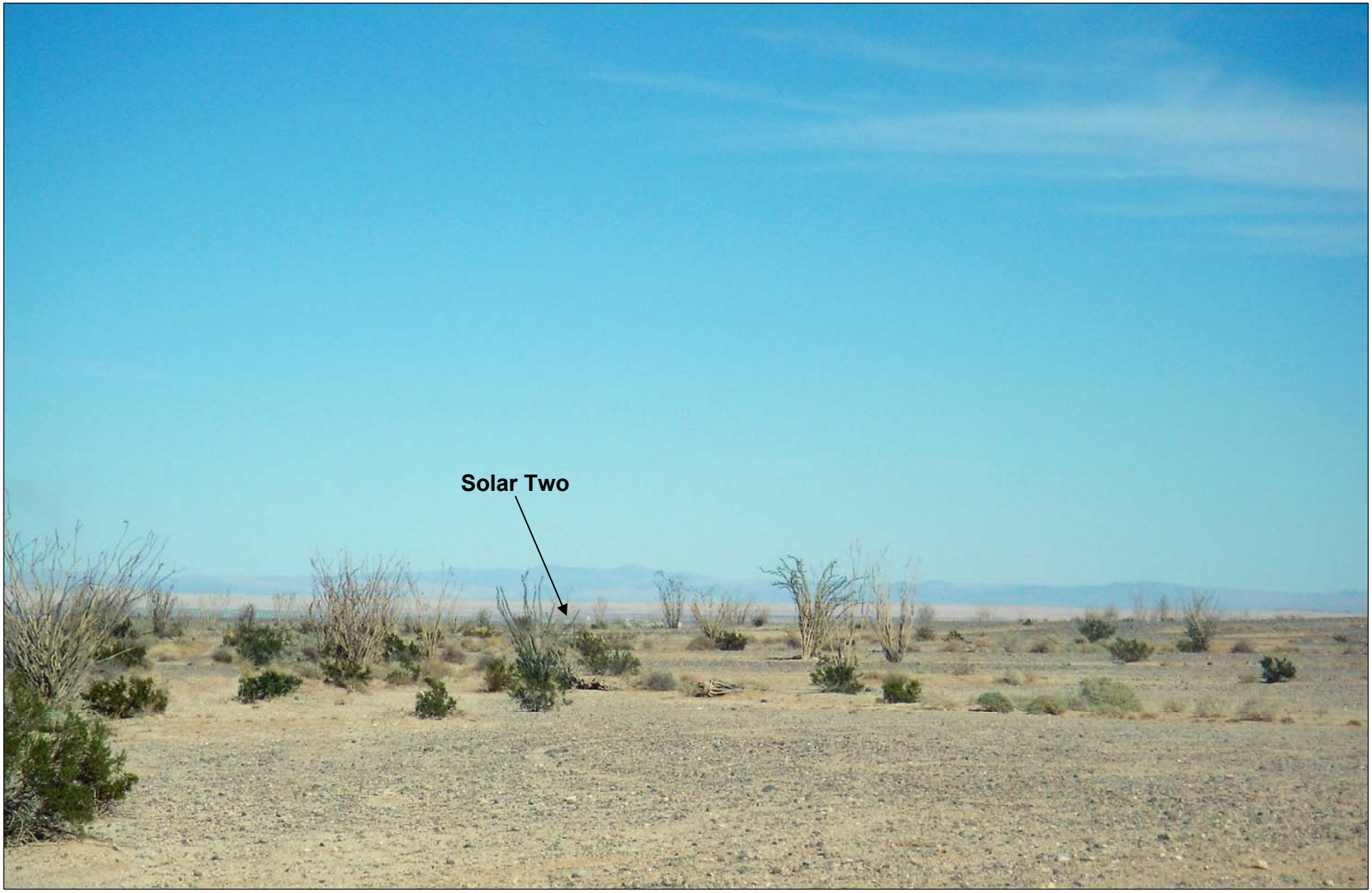
SIMULATED VIEW OF PROJECT FROM KOP #1
SOLAR TWO – DE ANZA TRAIL VIA

URS	NO SCALE	CREATED BY: AG	DATE: 01-06-10	FIG. NO: 5
		PM: AL	PROJ. NO: 27657102.00420	

KOP 2: Existing view from Anza Monument/Geoglyphs along De Anza Trail (approximately 2.5 miles south of Project).

EXISTING VIEW OF PROJECT FROM KOP #2
SOLAR TWO – DE ANZA TRAIL VIA

URS	NO SCALE	CREATED BY: AG	DATE: 01.06.10	FIG. NO: 6
		PM: AL	PROJ. NO: 27657102.00420	



KOP 2: Simulated view from Anza Monument/Geoglyphs along De Anza Trail (approximately 2.5 miles south of Project). This photo location is meant to represent "worst-case" views from recreational viewers to the south.

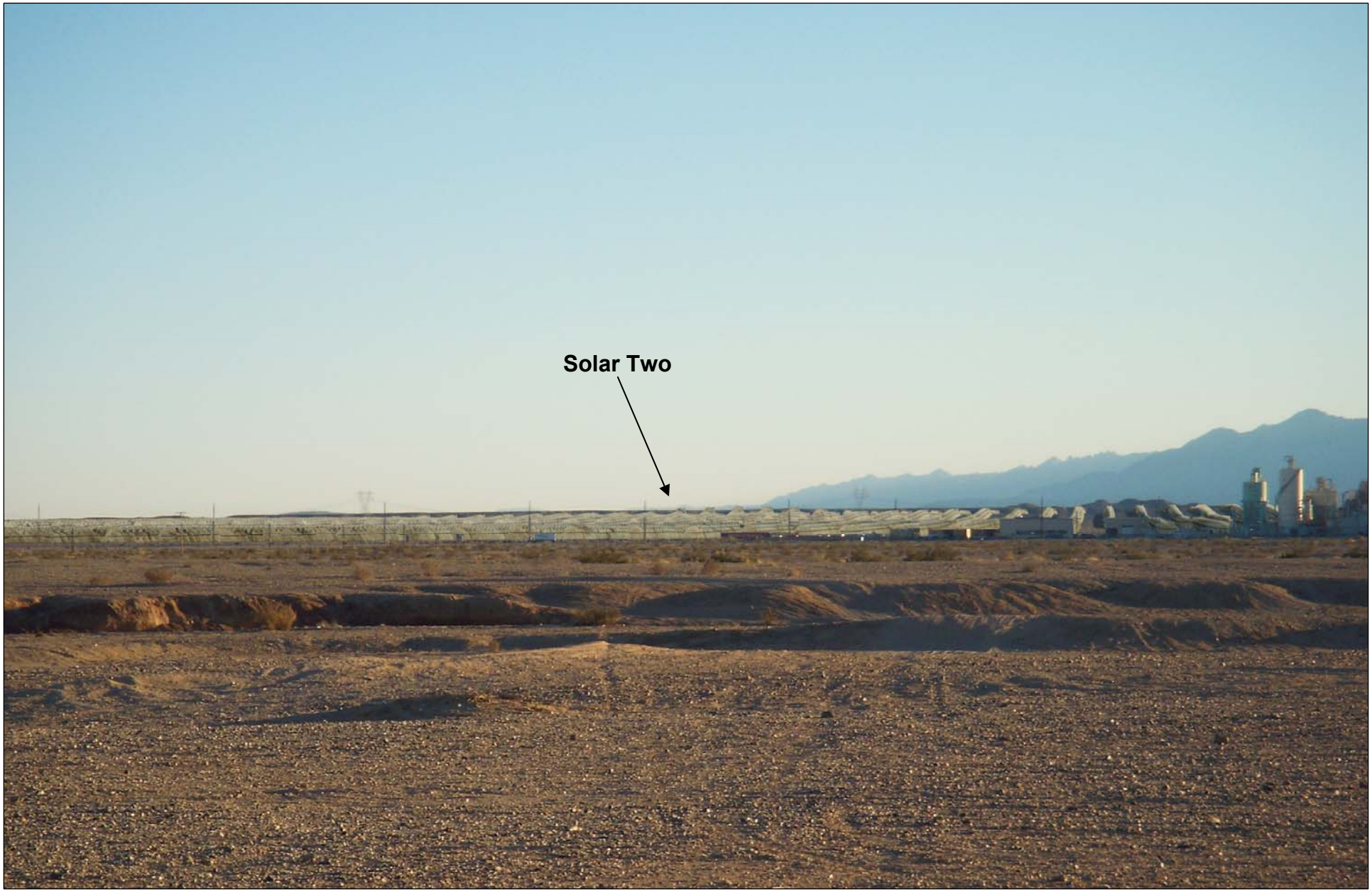
SIMULATED VIEW OF PROJECT FROM KOP #2
SOLAR TWO – DE ANZA TRAIL VIA

URS	NO SCALE	CREATED BY: AG	DATE: 01-06-10	FIG. NO: 7
		PM: AL	PROJ. NO: 27657102.00420	

KOP 3: Existing view from De Anza Trail (approximately 1.0 mile north of Project).

EXISTING VIEW OF PROJECT FROM KOP #3
SOLAR TWO – DE ANZA TRAIL VIA

URS	NO SCALE	CREATED BY: AG	DATE: 01.06.10	FIG. NO: 8
		PM: AL	PROJ. NO: 27657102.00420	



KOP 3: Simulated view from De Anza Trail (approximately 1.0 mile north of Project). This photo location is meant to represent "worst-case" views from recreational viewers to the north.

SIMULATED VIEW OF PROJECT FROM KOP #3
SOLAR TWO – DE ANZA TRAIL VIA

URS	NO SCALE	CREATED BY: AG	DATE: 01-06-10	FIG. NO: 9
		PM: AL	PROJ. NO: 27657102.00420	

Form 8400-4
(September 1985)

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

VISUAL CONTRAST RATING WORKSHEET

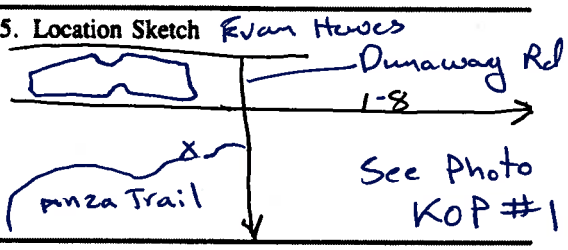
Date: January 5, 2010
District: California Desert / El Centro
Resource Area: Yuha Desert
Activity (program): Solar Energy

SECTION A. PROJECT INFORMATION

1. Project Name: Solar Two
2. Key Observation Point: #1
3. VRM Class: II

4. Location
Township: 16S
Range: 11E
Section: 27

5. Location Sketch (Evan Hewes)



SECTION B. CHARACTERISTIC LANDSCAPE DESCRIPTION

	1. LAND/WATER	2. VEGETATION	3. STRUCTURES
FORM	Flat w/ rutted wash areas	Simple scrub patterns. Patchy.	line form: I-8 Bloch form: Plaster City
LINE	horizontal	weak. Intermittent	horizontal: I-8 Geometric: Plaster City
COLOR	desert tans, browns and greys	light green and Tan	Grey and black Metallic
TEXTURE	Medium. Sand + Rock	Patchy. Medium.	Sparse and Coarse

SECTION C. PROPOSED ACTIVITY DESCRIPTION

	1. LAND/WATER	2. VEGETATION	3. STRUCTURES
FORM	Flat	None	Geometric, Disc, Angular
LINE	horizontal	Edge effect created by Project.	Vertical, horizontal + Angular
COLOR	desert tans, obscured by structures	Tans	Sky color (reflective), metallic or Painted tans
TEXTURE	Coarse	Patchy / None	Coarse

SECTION D. CONTRAST RATING ☐ SHORT TERM ☐ LONG TERM

1. DEGREE OF CONTRAST

ELEMENTS	FEATURES: LAND/WATER BODY (1) Strong	Moderate	Weak	None	VEGETATION (2) Strong	Moderate	Weak	None	STRUCTURES (3) Strong	Moderate	Weak	None
Form	X				X				X			
Line	X				X				X			
Color		X			X				X			
Texture	X				X				X			

2. Does project design meet visual resource management objectives? ☐ Yes ☒ No (Explain on reverse side)

3. Additional mitigating measures recommended ☒ Yes ☐ No (Explain on reverse side)
See Analysis

Evaluator's Names: Amy Gramlich, Seth Hopkins
Date: 1/05/10

Form 8400-4
(September 1985)

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

VISUAL CONTRAST RATING WORKSHEET

Date: January 5, 2010
District: CDCA
Resource Area: Yuha Desert
Activity (program): Solar Energy

SECTION A. PROJECT INFORMATION

1. Project Name: Solar Two
2. Key Observation Point: #2
3. VRM Class: II

4. Location
Township: 16.5S
Range: 10 E
Section: 2

5. Location Sketch: See Figure #1 for location.
See KOP #2 Photo.

SECTION B. CHARACTERISTIC LANDSCAPE DESCRIPTION

	1. LAND/WATER	2. VEGETATION	3. STRUCTURES
FORM	Flat to rolling Basin and wash areas	Simple patchy scrub Patterns	lines: 1-8 Area Monument Geometric/blocky: Plaster City
LINE	horizontal	weak intermittent	horizontal lines and Geometric
COLOR	desert tertiary tan greys, browns	light green / Tan	Grey, metallic
TEXTURE	Medium	Patchy	Sparse + Coarse

SECTION C. PROPOSED ACTIVITY DESCRIPTION

	1. LAND/WATER	2. VEGETATION	3. STRUCTURES
FORM	Flat	None	Geometric, Disc, Angular
LINE	horizontal	edge effect created by clearing / Project	Vertical, horizontal Angular
COLOR	desert colors obscured by structures	Tans	reflective, metallic Painted desert colors
TEXTURE	Coarse	Patchy / None	Coarse

SECTION D. CONTRAST RATING ☐ SHORT TERM ☐ LONG TERM

1. DEGREE OF CONTRAST

ELEMENTS	FEATURES: LAND/WATER BODY (1) Strong	Moderate	Weak	None	VEGETATION (2) Strong	Moderate	Weak	None	STRUCTURES (3) Strong	Moderate	Weak	None
Form		X					X			X		
Line		X				X				X		
Color			X			X					X	
Texture		X				X				X		

2. Does project design meet visual resource management objectives? ☐ Yes ☒ No (Explain on reverse side)

3. Additional mitigating measures recommended ☒ Yes ☐ No (Explain on reverse side)
See Analysis.

Evaluator's Names: Amy Gramlich, Seth Hopkins
Date: 1/5/2010

Form 8400-4
(September 1985)

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

VISUAL CONTRAST RATING WORKSHEET

Date: January 5, 2010
District: CDCA
Resource Area: Yuha Desert
Activity (program): Solar Energy

SECTION A. PROJECT INFORMATION

1. Project Name: Solar Two
2. Key Observation Point: #3
3. VRM Class: III

4. Location
Township: 16S
Range: 11E
Section: 5

5. Location Sketch: See Figure #1 and KOP #3 Photo

SECTION B. CHARACTERISTIC LANDSCAPE DESCRIPTION

	1. LAND/WATER	2. VEGETATION	3. STRUCTURES
FORM	Flat	Scrub patterns	lines: Evan Hewes Highway Geometric / blocky
LINE	horizontal	intermittent pattern	horizontal lines + geometric blocky
COLOR	desert tertiary	light green, brown, tan	Grey, metallic
TEXTURE	Medium	Patchy	Sparse, coarse, edge

SECTION C. PROPOSED ACTIVITY DESCRIPTION

	1. LAND/WATER	2. VEGETATION	3. STRUCTURES
FORM	Flat	None	Geometric, Disc, Angular
LINE	horizontal	edge effect created	vertical, horizontal, Angular
COLOR	desert colors obscured by project	Tans	reflective, metallic, painted desert tones
TEXTURE	Coarse	Patch / None	Coarse

SECTION D. CONTRAST RATING ☐ SHORT TERM ☐ LONG TERM

1. DEGREE OF CONTRAST

ELEMENTS	FEATURES: LAND/WATER BODY (1) Strong	Moderate	Weak	None	VEGETATION (2) Strong	Moderate	Weak	None	STRUCTURES (3) Strong	Moderate	Weak	None
Form		X			X				X			
Line		X				X				X		
Color		X				X				X		
Texture		X			X				X			

2. Does project design meet visual resource management objectives? ☐ Yes ☒ No (Explain on reverse side)

3. Additional mitigating measures recommended ☒ Yes ☐ No (Explain on reverse side)
See Analysis

Evaluator's Names: Amy Gramlich, Seth Hopkins
Date: 1/05/10

BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT COMMISSION OF THE STATE OF CALIFORNIA
1516 NINTH STREET, SACRAMENTO, CA 95814
1-800-822-6228 – WWW.ENERGY.CA.GOV

APPLICATION FOR CERTIFICATION
For the SES SOLAR TWO PROJECT

Docket No. 08-AFC-5

PROOF OF SERVICE
(Revised 8/17/09)

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*indicates change

DECLARATION OF SERVICE

I, Corinne Lytle , declare that on January 22, 2010, I served and filed copies of the Anza Trail Visual Impact Assessment. The original document, filed with the Docket Unit, is accompanied by a copy of the most recent Proof of Service list, located on the web page for this project at:
[http://www.energy.ca.gov/sitingcases/solartwo/index.html].

The documents have been sent to both the other parties in this proceeding (as shown on the Proof of Service list) and to the Commission's Docket Unit, in the following manner:

(***Check all that Apply***)

FOR SERVICE TO ALL OTHER PARTIES:

X sent electronically to all email addresses on the Proof of Service list;

X by personal delivery or by depositing in the United States mail at _____ with first-class postage thereon fully prepaid and addressed as provided on the Proof of Service list above to those addresses **NOT** marked "email preferred."

AND

FOR FILING WITH THE ENERGY COMMISSION:

X sending an original paper copy and one electronic copy, mailed and emailed respectively, to the address below (***preferred method***);

OR

_____ depositing in the mail an original and 12 paper copies, as follows:

CALIFORNIA ENERGY COMMISSION
Attn: Docket No. 08-AFC-5
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512
docket@energy.state.ca.us

I declare under penalty of perjury that the foregoing is true and correct.

Original Signed By
_____
Corinne Lytle

*indicates change