



Date:	May 24, 2010
To:	Patrick Brown, Land Use/Environmental Planner County of San Diego, Department of Planning and Land Use
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Subject:	ADDENDUM TO THE VISUAL RESOURCES REPORT FOR THE ENERGÍA SIERRA JUÁREZ U.S. TRANSMISSION, LLC GENERATION-TIE LINE PROJECT (3300-09-08 (P); ER. 09-22-001, KIVA PROJECT:09-0107420)

Introduction

In March 2010, ICF International staff completed a visual resources report (VRR) to assess the potential effects of the Energía Sierra Juárez U.S. Transmission, LLC Generation-Tie Line Project (project) on visual resources. The VRR was completed in accordance with *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements* and to satisfy the requirements of the California Environmental Quality Act (CEQA).

The project proposed the construction, operation, and maintenance of an approximately 1-mile-long portion of an electric generation tie (gen-tie) line from the Mexican border to the proposed location of a new electrical substation and subsequent loop into Southwest Powerlink (SWPL) 500-kilovolt (kV) transmission line in the Mountain Empire Community Planning Area. The project proposed either a single-circuit, 500-kV line (Route A1) or double-circuit 230-kV line (Route A2) supported by five 150-foot steel lattice towers or 150- to 170-foot steel monopole towers. The project would have the capacity to connect up to 1,250 megawatts (MWs) of future renewable wind energy-generated electrical power to be located in northern Baja, Mexico.

The VRR analyzed the most conservative project buildout scenario for visual resource impacts, which included the following project details:

- the project would consist of a single-circuit 500-kV line supported by five 150-foot-high steel lattice towers;
- the lattice towers would be sited approximately 750 feet apart;
- the lattice towers would be supported by cylindrical concrete pier foundations;
- the project would extend approximately 0.6 mile from the international border to its northern terminus at the proposed East County Substation (ECO Sub);

- the project would not include any fencing; and
- no lighting on the towers would be necessary, based on the Federal Aviation Administration (FAA) determination of no hazard to air navigation.

The VRR determined that the project would result in the following visual resource impacts:

- less-than-significant impacts would occur on the visual character and scenic quality of the project area;
- substantial adverse changes to one or more features that contribute to the valued visual character or image of the community would not occur as a result of the project;
- the project would not obstruct, interrupt, or detract from a valued focal point 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 project would be developed in a manner that is consistent with the goals, policies, and requirements of the Mountain Empire Subregional Plan and the applicable Scenic Area zoning regulations; and
- significant and unavoidable cumulative visual impacts would occur for short-term construction-period activities and for the large-scale change in the existing visual character as a result of the project combined with other reasonably foreseeable projects.

The Final VRR was submitted to the County of San Diego Department of Planning and Land Use (DPLU) for review on March 16, 2010, as part of Case Number 3300-09-08. DPLU staff determined that the VRR was data-adequate for County review purposes, and the VRR was preliminarily approved in March 2010. Final approval of the VRR rests with the California Public Utilities Commission (CPUC), whose decision of approval currently remains undetermined.

Alternative Route

Subsequent to the March 2010 Final VRR submittal, an alternative location for the ECO Sub (not part of the project and evaluated in a separate environmental document) was proposed and required the development of an alternative project route (ESJ Gen-Tie Alternative) to allow the gen-tie line to reach its terminus at the substation's new northeasterly location. The ESJ Gen-Tie Alternative route consists of Routes D1 and D2. Route D1 (500 kV line) is proposed to be supported by three steel lattice towers, and Route D2 (230 kV line) is proposed to be supported by three steel monopoles. Additionally, based on County review the access road to the project site from Old Highway 80 has been adjusted to meet sight line distance requirements.

Determination

It has been determined that an in-depth visual assessment of the ESJ Gen-Tie Alternative route is unnecessary because both Routes D1 and D2 would result in less significant visual impacts than the ESJ Gen-Tie route that was analyzed in the March 2010 VRR.

The March 2010 VRR analyzed the potential visual impacts associated with an approximately one 1-mile-long portion of the gen-tie line supported by five steel lattice towers. Because Routes D1 and D2 both propose the use of three support structures (towers or monopoles), the visual impact from structures would be lessened. The VRR analysis also concluded that vegetation removal associated with the tower placements would be the primary impact associated with the project. The vegetative clearing required for tower placement would reveal the sand colored underlying landform which contrasts starkly with the surrounding grey green, rough textured vegetative over cover. Three transmission line towers would require approximately 40% less vegetative clearing than the five-tower ESJ Gen-Tie (Routes A1 and A2) analyzed in the VRR. Because of their positions in the landscape (as documented and analyzed in the VRR), the towers are not visually dominant and their form tends to retreat into the surrounding landscape. The reduced number of tower structures in conjunction with the reduced footprint of vegetative clearing would result in a lesser degree of impact than the route analyzed in the VRR.

Alternative Routes D1 and D2 would create less contrast than the analyzed project and would be considered to be visually superior. This reduction is incremental and would not change the determinations of significance identified in the VRR (Sections 5.3, “Visual Assessment” and 5.4, “Determination of Significance”).

The VRR also documents a comprehensive quantitative analysis of the steel lattice vs. monopole support structures. The lattice towers proved to be incrementally visually superior to the monopole structures. This is attributable to the open, quasi-transparent nature of their form. The steel of the towers naturally weathers to a color which is remarkably similar to and congruent with the dominant color of the existing landscape backdrop. Furthermore, the lattice structures replicate the form, line, color, and texture of the existing Southwest Powerlink Transmission Line, which has been an elemental piece of the viewshed’s landscape fabric for decades.

The adjacent U.S. Bureau of Land Management (BLM)–administered land has a utility corridor land use designation overlay; so the project is consistent with BLM’s land management objectives. The monopole alternative would introduce a new architectural component into the landscape that would be contrary to fundamental BLM’s Visual Resource Management guidance that management activities should replicate existing form, line, color, and texture. Therefore, it may be duly concluded that Alternative Route D1 would be visually superior to Alternative Route D2 as documented in the VRR (Section 6, “Design Alternatives”).

The realignment of the project access road will not be visible from any of the Key Observation Points (KOPs) analyzed in the VRR. The new access road primarily uses existing roads for the majority of its proposed route. The vegetative clearing associated with access roads junction with Old

Highway 80 has been moved approximately 200 feet to the northeast of the location analyzed in the VRR. The road access was not identified as a major project feature or a visual component to the four analyzed KOPs. This minor adjustment of a visually inconsequential project component will not affect the significance determinations identified in the VRR (Section 5.4).

Because the VRR completed in March 2010 for the ESJ Gen-Tie route was determined to be data-adequate and subsequently approved by County of San Diego DPLU staff, it is sufficient for the purpose of assessing the visual effects associated with implementation of ESJ Gen-Tie Alternative Routes D1 and D2.