D Visual Impact Assessment

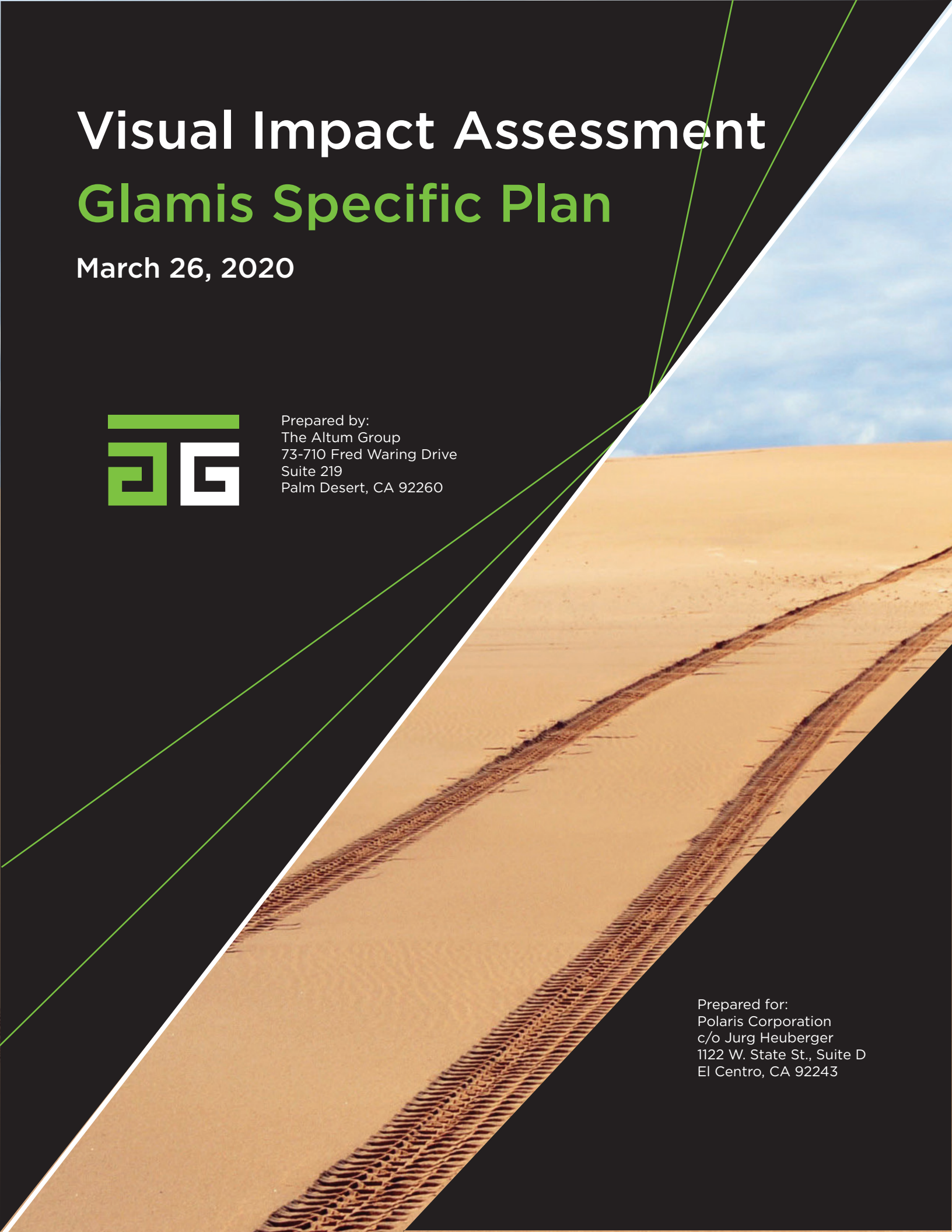
This page intentionally left blank.

Visual Impact Assessment

Glamis Specific Plan

March 26, 2020

Prepared by:
The Altum Group
73-710 Fred Waring Drive
Suite 219
Palm Desert, CA 92260



Prepared for:
Polaris Corporation
c/o Jurg Heuberger
1122 W. State St., Suite D
El Centro, CA 92243

Visual Impact Assessment
Glamis Specific Plan

March 26, 2020

Prepared by:

The Altum Group
73-710 Fred Waring Drive, Suite 219
Palm Desert, CA 92260

TABLE OF CONTENTS

1 Executive Summary 1
2 Environmental Setting 1
2.1 Regional Character 1
2.2 Existing Visual Character 2
2.2.1 Scenic Highways 2
2.2.3 Vista Points 3
2.2.4 Wilderness Areas 3
2.3 Project Description 3
3 Methodology 4
3.1 BLM Visual Resource Inventory and Management Guidance 4
3.2 Field Acquisition and Methods 5
3.3 Landscape Visibility 5
3.4 Key Observation Points 6
4 Regulatory Setting 8
4.1 Federal 8
4.2 State 8
4.3 Local 8
5 Thresholds of Significance/Criteria 8
6 Impact Analysis 9
7 References 11

APPENDIX

A – Exhibits
B – Contrast Rating Worksheets

1 EXECUTIVE SUMMARY

This Visual Impact Assessment (VIA) has been prepared to provide support for a California Environmental Quality Act (CEQA) Environmental Impact Report (EIR) that is being prepared for the Glamis Specific Plan (Project). This VIA provides the technical documentation to support the analysis of aesthetics for the EIR and utilizes the visual resource contrast rating system from the Bureau of Land Management (BLM).

The visual resource contrast rating system is used by the BLM to analyze potential visual impacts of proposed projects and activities. The degree to which a project or activity affects the visual quality of a landscape depends on the visual contrast created between a project and the existing landscape. The contrast can be measured by comparing the project features with the major features in the existing landscape. The basic design elements of form, line, color, and texture are used to make this comparison and to describe the visual contrast created by the project. This assessment process provides a means for determining visual impacts and for identifying measures to mitigate impacts. The key observation points (KOPs) were used as locations where proposed land uses would be highly visible. Exhibit 1, *Key Observation Points*, shows the project site as well as the location of each KOP (discussed in Section 2.2.4 below).

2 ENVIRONMENTAL SETTING

2.1 Regional Character

The Glamis Specific Plan (GSP) area (or project site) is located approximately 27 miles east of Brawley at the intersection of State Route 78 (SR-78) and the Union Pacific Railroad (UPRR) in Imperial County, California. Geographically, the project site is located within the lower Colorado River Sonoran Desert Region in the east central portion of Imperial County.

The GSP area contains the only private commercial land uses within the project vicinity and is surrounded by open desert land that is managed by the Bureau of Land Management (BLM). The project site is adjacent to the Imperial Sand Dunes Recreation Area (ISDRA), the largest sand dunes area in the State of California. Directly northwest of the project site is the North Algodones Dunes Wilderness (NADW); which consists of approximately 26,000 acres of land managed by the BLM as part of the National Wilderness Preservation System. Additionally, the Chocolate Mountain Aerial Gunnery Range (CMAGR) is located approximately 3 miles to the north of the GSP. Within all of the various BLM lands surrounding the GSP, the BLM has designated Recreation Management Zones (RMZs) which dictate the allowable recreation activities within those areas and provide for BLM's management objectives within those areas. The ISDRA, NADW, and RMZs are briefly discussed below:

Imperial Sand Dunes Recreation Area (ISDRA)

The ISDRA is the largest mass of sand dunes in the State of California, extending for more than 40 miles in length (from north to south), and averaging approximately 5 miles wide (from east to west). Dunes within the ISDRA can reach heights of 300 feet above the desert floor, providing OHV recreationists an ideal location for their activities. The ISDRA, which is managed by the BLM, includes a variety of camping areas, ranger stations, restrooms, and other facilities to support OHV recreationists who visit the area primarily between October and April each year. The BLM allows special events with a permit within the ISDRA.

North Algodones Dunes Wilderness (NADW)

The NADW covers more than 26,000 acres and is managed by the BLM as a part of the National Wilderness Preservation System. The NADW is closed to all vehicles and mechanized use. Camping is allowed throughout the area, however there is no water and no facilities for visitors within the NADW.

BLM Recreation Management Zones

The BLM has designated RMZs on BLM lands located throughout the area surrounding the GSP. The RMZs provide an activity-level planning framework for BLM's recreation management. The RMZs have been allocated throughout the planning area to represent permitted recreation niches (activities, experiences and benefits). The GSP is bordered by three RMZs: Open RMZ to the south, Limited RMZ to the northeast, and the North Algodones Dunes Wilderness RMZ to the northwest. The Open RMZ allows for unrestricted OHV recreation, camping, commercial vending, hiking and wildlife viewing. The Limited RMZ allows for limited use OHV recreation (travel limited to designated routes of travel or areas with seasonal restrictions under specific conditions), camping, and environmental education and tourism opportunities. The North Algodones Dunes Wilderness RMZ prohibits any motorized recreation opportunities and allows for non-motorized recreation opportunities and allows for non-motorized recreation, such as camping, hiking and educational opportunities.

2.2 Existing Visual Character

The project site is mostly comprised of open, sandy, disturbed desert and is intersected by SR-78 and the UPRR. Per the *List of Officially Designated County Scenic Highways* from Caltrans, SR-78 is not a County designated scenic route. All existing development occurs within approximately 0.25 miles of the intersection of SR-78 and the UPRR and consists of several adjoined one- and two-story metal building structures with water tanks which comprise the Glamis Beach Store, a historic building (ASM Affiliates, 2019). The project site also contains an existing paved RV storage lot immediately north of SR-78, wood posting for sectioned-off parking/vendor areas within the southwest portion of the project site, a wireless communications facility located within the southeast portion of the project site, a private residence/storage building next to an unmaintained storage shed with shipping containers at the southeastern corner of the project site, and an existing historical cemetery immediately south of Ted Kipf Road. There are no rock outcroppings and very few trees present within the project site. Currently, the only existing light sources within or nearby to the project site come from the Glamis Beach Store. Existing on site features are illustrated in Exhibit 2, *Existing Land Use*.

The project site is relatively flat with a southwest-to-northeast trending grade of less than one percent or an approximate difference in elevation of 23 feet above mean sea level (amsl) between the southwest corner of the site (approximate elevation of 324 feet amsl) and the northeast corner of the site (approximately 347 feet amsl). Areas of wind-blown sand dunes with sporadic native vegetation are found situated and encroaching upon the southeast corner of the project site. Public views of the project site would be primarily seen by viewers who are traveling east or west along SR-78. In addition, the project site would be visible from adjoining BLM land such as the NADW.

2.2.1 Scenic Highways

There are no highways within the project site and vicinity that have been designated by the California Department of Transportation (Caltrans) as a scenic highway. As described above in Section 2.2, *Existing Visual Character*, the *Cultural Resource Inventory* conducted in 2019 by ASM Affiliates found the Glamis

Beach Store to be a historic building. There are no rock outcroppings and very few trees present on the project site.

2.2.3 Vista Points

According to the Caltrans GIS data (accessed on November 12, 2019), the nearest vista point, Inspiration Point, is approximately 103 miles west of the project site. There are no Caltrans designated vista points in the vicinity of the project site.

2.2.4 Wilderness Areas

Wilderness Areas are managed under the Wilderness Act and generally do not allow motorized equipment, motor vehicles, mechanical transport, temporary roads, or permanent structures or installations. The NADW covers more than 26,000 acres and is managed by the BLM as a part of the National Wilderness Preservation System. The NADW is closed to all vehicles and mechanized use. Camping is allowed throughout the area, however there is no water and no facilities for visitors within the NADW.

2.3 Project Description

The approximately 142-acre project site is located and contained within the County's designated Glamis Specific Plan Area (GSPA). The GSPA allows for the development and creation of a Specific Plan in accordance with GSPA design criteria, objectives and policies as outlined in the County's General Plan Land Use Element. As shown in Exhibit 3, *Current Imperial County Zoning - Project Site*, the existing zoning designation for the project site is Open Space/Preservation (S-2) and a very small area that is designated General Commercial (C-2). The general area of the Glamis Beach Store is zoned as C-2, while the remainder of the project site is zoned as S-2.

The proposed project includes the development of the GSP, which provides for a flexible commercial-recreational master plan with a broad range of land uses ranging from recreational, commercial/retail, storage, entertainment, hospitality, residential, renewable energy, utility facilities, among other primary and complimentary land uses. The proposed project also includes the establishment of Commercial/Recreational (CR) designated zoning which includes different levels of allowable land use intensity. In addition, the proposed project includes a General Plan Amendment (GPA) and Change of Zone (CZ) for County approval. The GSP proposes a Change of Zone from S-2 (Open Space/Preservation) to S-1 (Open Space/Recreation) for the approximate 1- acre parcel on the southeast side of the project site.

As illustrated in Exhibit 4, *Zoning Designations and Planning Areas*, the GSP consists of eight (8) planning areas: Planning Areas 1, 2, 3, and 4 are designated Commercial-Recreation 3 (CR-3) Zone where the maximum range of recreational, commercial, resort, retail, medical, entertainment, and utility infrastructure land uses are allowed; Planning Areas 5 and 6 that are designated CR-1 Zone, which provides the most restrictive range of commercial/recreational land uses; Planning Area 7 is designated CR-2 Zone, which provides for a moderate-level of commercial/recreational land uses, and Planning Area 8 would be re-zoned to the County's S-1 (Open Space/Recreation) Zoning District. The S-1 zone designates areas that recognize the unique Open Space and Recreational character of Imperial County including the deserts, mountains and waterfront areas. The S-1 Zone is primarily characterized by low intensity human utilization and small-scale recreation related uses. Exhibit 5, *Conceptual Site Plan,* illustrates the potential build-out of the project site.

3 METHODOLOGY

3.1 BLM Visual Resource Inventory and Management Guidance

The County of Imperial (County) does not have adopted guidelines for conducting visual resource impact assessments. BLM uses a Visual Resources Inventory (VRI) classes system as a baseline description of the existing scenic values in the environment that does not provide objectives as to how the land should be used or managed. Given that the project site is surrounded by BLM land, it was determined that the BLM VRI class system was an appropriate methodology to utilize for purposes of assessing baseline scenic values in the project area. All VRI descriptions used for this analysis are based on the BLM's VRI Inventory Classes identified in the Desert Renewable Energy Conservation Plan (Bureau of Land Management, 2016).

The VRI, developed by BLM, identifies the visual resources of a given area and, based upon specific standards, assigns an inventory class to each area. This process, further described in detail in BLM Manual H-8410-1 (Bureau of Land Management, 1986), involves rating the resource's visual qualities, measuring public concern, and determining the extent to which an area is visible from travel routes and other observation points. Those three factors then determine which of the four VRI classes are assigned to each area of BLM-administered lands based on visual sensitivity (high, medium, and low), scenic quality (A to C), and distance. According to the BLM:

> These four VRI classes represent the relative values of the existing visual resources. VRI Classes I and II represent the highest visual value, Class III represents moderate value, and Class IV represents relatively low visual value. The four VRI classes are the foundation upon which BLM considers visual values in its management planning process.

As shown in Exhibit 6, *Project VRI Classifications*, land within the NADW are identified as VRI Class 1. South of the project site lands are classified as VRI Class IV and transition to VRI Class II. Land along SR-78 are classified as VRI Class IV. To the north and west of the Project site land is classified as VRI Class III. The GSP area does not have a VRI classification, since it is not located within BLM land.

Specific terminology used in describing the existing visual environment is provided below.

- Contrast – Opposition or unlikeness of different forms, lines, colors, or textures in a landscape. Contrast rating: a method of analyzing the potential visual impacts of proposed activities.
- Form – The mass or shape of an object or objects that appears unified, such as a vegetative opening in a forest, a cliff or mountain formation, a water tank, or a highway overpass.
- Key Observation Point (KOP) – One or a series of points on a travel route or at a use area or potential use area, where the view of a management activity would be most revealing.
- Scenic quality is a measure of the visual appeal of a tract of land. In the visual resources inventory process, public lands are given an A, B, or C rating based on the apparent scenic quality that is determined using seven key factors: landform, vegetation, water, color, adjacent scenery, scarcity, and cultural modifications.
- Sensitivity level. Sensitivity levels are a measure of public concern for scenic quality. Public lands are assigned high, medium, or low sensitivity levels by analyzing the various indicators of public concern.
- Simulation – A realistic visual portrayal that demonstrates the perceivable changes in landscape features caused by a proposed management activity.

- Texture – The visual manifestations of the interplay of light and shadow created by the variations in the surface of an object or landscape.
- Viewshed – A landscape unit seen from a key observation point.
- Visual quality – The relative worth of a landscape from a visual perception point of view.
- Visual resource – The visible physical features on a landscape (for example, land, water vegetation, animals, structures, and other features).
- Visual Resource Inventory – The visual resource inventory process provides BLM managers with a means for determining visual values.

3.2 Field Acquisition and Methods

This VIA uses terminology and follows guidance as recommended by Bureau of Land Management (BLM) Manual 8431 (1986). In following that methodology as guidance, key observation points (KOPs) were selected for further evaluation. To establish the KOP locations, 35 locations were documented around the project site for viewsheds into the surrounding BLM VRI classification as described above. KOPs were then selected that provide a representative vantage of the surrounding viewshed that have the potential to view the Project and may be sensitive to changes in the visual landscape.

The visual changes to the existing environment are described according to the terminology used in describing the existing visual environment and then assessed in the context of viewer sensitivity. In evaluating the project's impact on the existing visual environment, the analysis considers the relationship between the magnitude of change to specific visual characteristics, the location of the visual change relative to sensitive land uses, and the length of time these visual changes are visible.

As an example, the permanent removal and conversion of an undisturbed, natural area to an urban land use (i.e., commercial) or the modification of an existing historically significant structure within the foreground view of a state-designated scenic highway could have a significant visual impact pursuant to CEQA. In contrast, the conversion of previously disturbed areas, including agricultural lands to urban land use, may not be significant pursuant to CEQA, especially if adjacent areas already included these types of landscape alterations. The contrast rating worksheets completed in support for this assessment are included in Appendix B.

Photographs were taken with an IPhone 8 camera during good weather conditions on August 26, 2019. Each photo-documented location was recorded using the ArcCollector field survey application from the Environmental Systems Research Institute (Esri) set to NAD 83, UTM Zone 10N.

3.3 Landscape Visibility

Perception of details (e.g., form, line, color, and texture) diminishes with increasing distance. The distance zone is dependent on the location of the observer relative to the project. These distance zones are (Bureau of Land Management,1986):

- Foreground and middle ground: 0 to 5 miles from point of interest
- Background: remaining area up to 15 miles away from the point of interest
- Seldom seen: over 15 miles from the point of interest

In addition, the inventory evaluated if views were open, partially screened (filtered), or screened (e.g., presence of hillside terrain, vegetation, and/or buildings)

3.4 Key Observation Points

Five (5) KOPs were selected to assess the level of visual change resulting from the project on the existing environment. The locations of the five (5) KOPs are presented in Exhibit 1, *Key Observation Points*. The KOPs were selected to capture representative vantages from SR-78. Photos from each KOP are presented in Exhibits 4 through 8.

Key Observation Point 1

KOP 1 is located on the northwest parcel of the Project directly above Ted Kipf Road. This KOP displays views oriented south toward the ISDRA (see Exhibit 7, KOP 1) with the project site contained in the middleground. The foreground in KOP 1 contains visual encroachments such as fencing. The middleground in KOP 1 contains a combination of open disturbed desert and the RV storage area. The spanning background provides views of the Imperial Sand Dunes. The scenic attractiveness of KOP 1 is typically based on its common scenic quality and the commercial uses in the middle, which lacks contrast. This landscape view is common in the area, without distinctive features, such as unusual landforms or other features.

The scenic quality of KOP 1 is moderate (Class III) since the existing visual encroachment appear subordinate to the overall landscape. This KOP provides a typical view for a pedestrian, car, OHV or truck traveling on Ted Kipf Road, likely traveling at a low to medium speed based on the posted speed limit. Considering the short duration of viewing, viewers would have a moderate level of viewer sensitivity to the visual changes in the area, since the project site is more or less unobstructed from view.

Key Observation Point 2

KOP 2 is located on the westbound side of SR-78 on the right corner of the northeast parcel of the project. This KOP displays views from the highway, oriented southeast (see Exhibit 8, KOP 2) with the project site in the middleground. The foreground and middleground in KOP 2, contains visual encroachments such as fencing, wireless communications facility, transmission lines, and Glamis Beach Store. The scenic attractiveness of KOP 2 is typical based on its common scenic quality and few visual encroachments, which lacks contrast. This landscape view is common in the area, without distinctive features, such as unusual landforms or other features.

The scenic quality of KOP 2 is moderate (Class III) since the existing visual encroachment including, fencing, wireless communications facility, transmissions lines, and Glamis Beach Store appear subordinate to the overall landscape. This KOP provides a typical view for a motorist traveling east on SR-78, likely traveling at a high rate of speed based on the posted speed limit. Considering the short duration of viewing, viewers would have a moderate level of viewer sensitivity to the visual changes in the area, since the project site is more or less unobstructed from view.

Key Observation Point 3

KOP 3 is located on the eastbound side of Highway 78 just east of the project site. This KOP displays views from the highway, oriented west (see Exhibit 9, KOP 3) with the project site contained in the middleground. The foreground in KOP 3 contains visual encroachments such as fencing and highway signage. The middleground in KOP 3 contains a combination of open, disturbed desert, transmissions line, and the RV storage area. The scenic attractiveness of KOP 3 is typically based on its common scenic quality and the commercial uses in the middle, which lacks contrast. This landscape view is common in the area, without distinctive features, such as unusual landforms or other features.

The scenic quality of KOP 3 is moderate (Class III) since the existing visual encroachment including signage, utility distribution lines, commercial facilities, and the Union Pacific Railroad appear subordinate to the overall landscape. This KOP provides a typical view for a motorist traveling west on Highway 78, likely traveling at a high rate of speed based on the posted speed limit. Considering the short duration of viewing, viewers would have a moderate level of viewer sensitivity to the visual changes in the area, since the Project site is more or less unobstructed from view.

Key Observation Point 4

KOP 4 is located on the southeast corner of the project site and depicts views from the ISDRA oriented northwest (see Exhibit 10, KOP 4) with the project site contained in the middleground. The foreground in KOP 4 contains visual encroachments such as fencing and a private residence/storage building. The middleground in KOP 4 contains a combination of open, disturbed desert and the metal building structures representing the Glamis Beach Store. The ridgelines of the Chocolate Mountains are visible in the background to the north. The scenic attractiveness of KOP 4 is typical based on its common scenic quality and the commercial uses in the middle, which lacks contrast. This landscape view is common in the area, without distinctive features, such as unusual landforms or other features. The scenic quality of KOP 4 is moderate (Class III) since the existing visual encroachment including fencing and commercial uses appear subordinate to the overall landscape. This KOP provides a typical view for a pedestrian walking on or OHV traveling along the southern border of the project site. Considering the short duration of viewing, viewers would have a moderate level of viewer sensitivity to the visual changes in the area, since the project site is more or less unobstructed from view.

Key Observation Point 5

KOP 5 is located on the eastbound side of SR-78; just east of the project site and depicts views from the highway, oriented southwest (see Exhibit 11, KOP 5). The foreground in KOP 5 contains visual encroachments such as wood posting for sectioned-off parking and vendor areas. The middleground in KOP 5 is mostly comprised of open, disturbed desert and a wireless communications tower. The Chocolate Mountains ridgeline is visible in the background to the north. The scenic attractiveness of KOP 5 is typical based on its common scenic quality and wood posting, which lacks contrast. This landscape view is common in the area, without distinctive features, such as unusual landforms or other features.

The scenic quality of KOP 5 is moderate (Class III) since the existing visual encroachment including the wood posting and wireless communications tower. This KOP provides a typical view for a motorist traveling westbound on SR-78, likely traveling at a moderate to high rate of speed based on the posted speed limit. Considering the short duration of viewing, viewers would have a moderate level of viewer sensitivity to the visual changes in the area, since the project site is more or less unobstructed from view.

4 REGULATORY SETTING

The following section outlines any federal, state, and local laws, policies, and regulations, which apply to the Project area and were considered in the development of this visual resource assessment.

4.1 Federal

Although the project site occurs entirely on private land, this VIA utilizes BLM methodology described in Section 3.1, *BLM Visual Resource Inventory and Management Guidance,* to assess potential visual impacts from the proposed project. Since BLM land surrounds the project site, the use of BLM methodology is encouraged by the BLM although not a requirement.

4.2 State

In order to analyze aesthetic impacts from the proposed project, the significance criteria outlined in Appendix G of the CEQA Guidelines are applied to determine the proposed project's impact to existing visual resources. The CEQA-defined aesthetic issues of concern are listed below in Section 5, *Thresholds of Significance/Criteria*.

4.3 Local

The project site is under the County of Imperial jurisdiction and subject to the County Development code and General Plan guidelines. Section 92407.01 of the Development Code includes development criteria for facilities located within one-half-mile of a designated scenic highway, however there are no designated scenic highways within one-half-mile of the project site. The County General Plan does not specifically contain a visual element; however, it addresses related topics in the following General Plan Sections: Section 1 – Land Use Element; Section 2 – Circulation & Scenic Highways Element, and Section 5 – Renewable Energy & Transmission Element. The Renewable Energy and Conservation Element (revised on October 6, 2015) includes specific goals, policies and standards for renewable energy and specifically solar projects. As stated in Section 2.2, SR-78 is not a County designated scenic route.

5 THRESHOLDS OF SIGNIFICANCE/CRITERIA

The County of Imperial does not have adopted guidelines for conducting visual resource impact assessments. For this analysis, the significance criteria outlined in the Appendix G of the CEQA Guidelines are applied to determine the project's impact to existing visual resources. The CEQA-defined aesthetic issues of concern are:

- Would the proposed project cause substantial, adverse effects on a scenic vista?
- Would the proposed project cause substantial damage to scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?
- Would the proposed project cause a substantial degradation of existing visual character or quality of public views of the site and its surroundings? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?
- Would the proposed project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

6 IMPACT ANALYSIS

6.1 Would the Project have a substantial adverse effect on a scenic vista?

No designated scenic vistas as identified by Caltrans are located within visible distance of the project site. Per the *List of Officially Designated County Scenic Highways* from Caltrans, the project site is not located within a County designated scenic route. The project site is located in a relatively flat area and does not have any rock outcroppings and contains very few trees.

The project site, as viewed from multiple vantage points, is already developed with commercial and infrastructure uses. The southwest portion of the project site contains an existing RV Storage facility, directly northwest of the Glamis Beach Store. The SR-78 and the UPRR bisect each other, running northeast and northwest respectively. As described in Section 2, *Regional Character,* the project site bordered by the ISDRA to the south, the NADW to the west, and BLM land to the north and east. Immediate surrounding views from the project site consist of the NADW to the northwest, and the Chocolate Mountains Range to the north and east.

KOP 1 provides a representative north-south view of the project site along Ted Kipf Road. As shown on Exhibit 5, *Conceptual Site Plan*, the potential land uses visible from KOP 1 would include guest housing, solar array, RV Park, and RV Storage. The largest contrast would appear in the addition of buildings to the vacant desert landscape and reduction of desert vegetation. Although the RV Park and RV Storage would be visible from KOP 4, they would not substantially degrade the view shed or obstruct views of the Imperial Sand Dunes. Per the Land Use Element of the Imperial County General Plan and Zoning Ordinance 93304.06, buildings would be sited to allow through views from SR-78 to open space beyond and the height of any structure will not exceed 80 feet. Given the typical attractiveness, moderate scenic quality (Class III) based on existing visual encroachments, and moderate viewer sensitivity level, no significant landscape change is identified for KOP 1.

KOP 2 provides a representative east-west view of the project site above SR-78. As shown on Exhibit 5, *Conceptual Site Plan*, the potential land uses visible from KOP 2 would include the proposed Polaris Research & Development Facility, RV Park & Storage, dump station, solar array and solar generating facility. The largest contrast would appear in the addition of buildings to the desert landscape and reduction of desert vegetation. Although the proposed Polaris Research & Development Facility, RV Park & Storage, and dump station would be visible from KOP 2, all buildings would be sited to allow through views from SR-78 and the height of any structure will not exceed 80 feet. Given the typical attractiveness, moderate scenic quality (Class III) based on existing visual encroachments, and moderate viewer sensitivity level, no significant landscape change is identified for KOP 2.

KOP 3 provides a representative east-west view of the project site along SR-78. As shown on Exhibit 5, *Conceptual Site Plan,* the potential land uses visible from KOP 3 would include the special event space, RV park, solar array and guest housing. The largest contrast would appear in the addition of buildings to the desert landscape on the northwest corner of KOP 3, however would not substantially degrade the viewshed or obstruct views of the NADW as all building would be sited to allow through views from SR-78 and the height of any structure would not exceed 80 feet. The special event space would not add buildings to the area, thus would not impact the scenic vista of the NADW. Given the typical attractiveness, moderate scenic quality (Class III) based on existing visual encroachments, and moderate viewer sensitivity level, no significant landscape change is identified for KOP 3.

KOP 4 provides a representative south-north view of the project site south of the existing residential building on the southeast parcel of the proposed project. As shown on Exhibit 5, *Conceptual Site Plan*, the potential land uses visible from KOP 4 would primarily be utilized as a special event space and would not add buildings to the area, thus would not impact views for travelers along SR-78. Given the typical attractiveness, moderate scenic quality (Class III) based on existing visual encroachments, and moderate viewer sensitivity level, no significant landscape change is identified for KOP 4.

KOP 5 provides a representative south-east view of the project site just above the southwest parcel of the proposed project. As shown on Exhibit 5, *Conceptual Site Plan*, the potential land uses visible from KOP 5 would include a solar array and wastewater lift station. All buildings would be sited to allow through views from SR-78 and the height of any structure would not exceed 80 feet. Given the typical attractiveness, moderate scenic quality (Class III) based on existing visual encroachments, and moderate viewer sensitivity level, no significant landscape change is identified for KOP 5.

Based on these considerations, including various existing visual encroachments on-site and the placement of proposed buildings to allow through views from SR-78, the proposed project would not result in a substantial adverse effect on a scenic vista and a less than significant impact would occur. No mitigation is required.

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

Based on a review of the Caltrans California Scenic Highway Mapping program, SR-78 is considered a state scenic highway from SR-79 at Santa Ysabel to SR 86 near Salton City, in addition to the Anza-Borrego Desert State Park Road. However, the portion of SR-78 within the project site and its immediate vicinity is not considered a state scenic highway. As described above in Section 6.2, the project site is not located within a County designated scenic route. The project site does not contain any rock outcroppings and has very few trees present on-site. The Glamis Beach Store is considered a historical resource per the *Cultural Resource Inventory*. However, the proposed project would not substantially alter or change the character of the Glamis Beach Store and would preserve the historical significance it provides to the project site. As such, the proposed project would not substantially damage scenic resources and impacts would be less than significant. No mitigation is required.

6.3 Would the Project substantially degrade the existing visual character or quality of the site and its surroundings?

The project site is rural in character with a few visual encroachments, including existing commercial and residential structures, a wireless communications tower, and railroad infrastructure. The project site is located in an area that has been traveled over extensively by OHVs due to the recreational nature of the NADW and BLM land that surrounds the project site. As analyzed above in Section 6.1, given the typical attractiveness, moderate scenic quality (Class III) based on existing visual encroachments, moderate viewer sensitivity level of KOPs 1 through 5, and the placement of proposed buildings allowing through views from SR-78, no significant landscape changes would occur from the proposed project. Therefore, the project would not substantially degrade the existing visual character or quality of the project site and its surroundings and impacts would be less than significant. No mitigation is required.

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

The project is not expected to create a substantial new source of nighttime lighting or day-time glare and will provide external safety lighting for both normal and emergency conditions at the primary access points. Lighting will be designed to provide the minimum illumination needed to achieve safety and security in the project area and will be downward facing and shielded in order to focus the illumination in the immediate area. Additionally, the proposed project will comply with Imperial County Ordinance 90301 which regulates glare, outdoor lighting, and night sky protection. All lighting associated with the proposed project will be subject to County approval and compliance with Imperial County Requirements. Therefore, the proposed project would have a less than significant impact associated with nighttime lighting, and no mitigation is required.

The proposed project has the potential to develop solar arrays and solar generating facilities to provide on-site power to the area. Although there would be some level of potential reflectivity from the operation of solar panels, upon final design, solar panels would be selected that would help minimize reflectivity and would be oriented in a manner that would minimize reflectivity towards high use recreational areas on surrounding BLM lands. Solar arrays would be designed to not orient the panels towards any known air travel routs for private, commercial, or military airplanes. A full glint/glare analysis is beyond the scope of this VIA and will need to be completed prior to the construction and operation of any solar arrays and facilities.

7 REFERENCES

ASM Affiliates. 2019. Cultural Resource Inventory. *Draft Class III Cultural Resources Inventory Report for the Glamis Specific Plan Project, Glamis, Imperial County, California.*

Bureau of Land Management (BLM). 1986. Visual Resource Inventory. *BLM Manual Handbook H-8410-1.*

BLM 2016. Desert Renewable Energy Conservation Plan, Proposed Land Use Plan Amendment and Final Environmental Impact Statement.

Caltrans (California Department of Transportation). 2015. *Caltrans GIS Data: California Vista Points.* https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways

2017. *California State Scenic Highway Mapping System* https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways

2015, *List of Officially Designated County Scenic Highways* https://dot.ca.gov/-/media/dot-media/programs/design/documents/od-county-scenic-hwys-2015-a11y.pdf

Appendix A

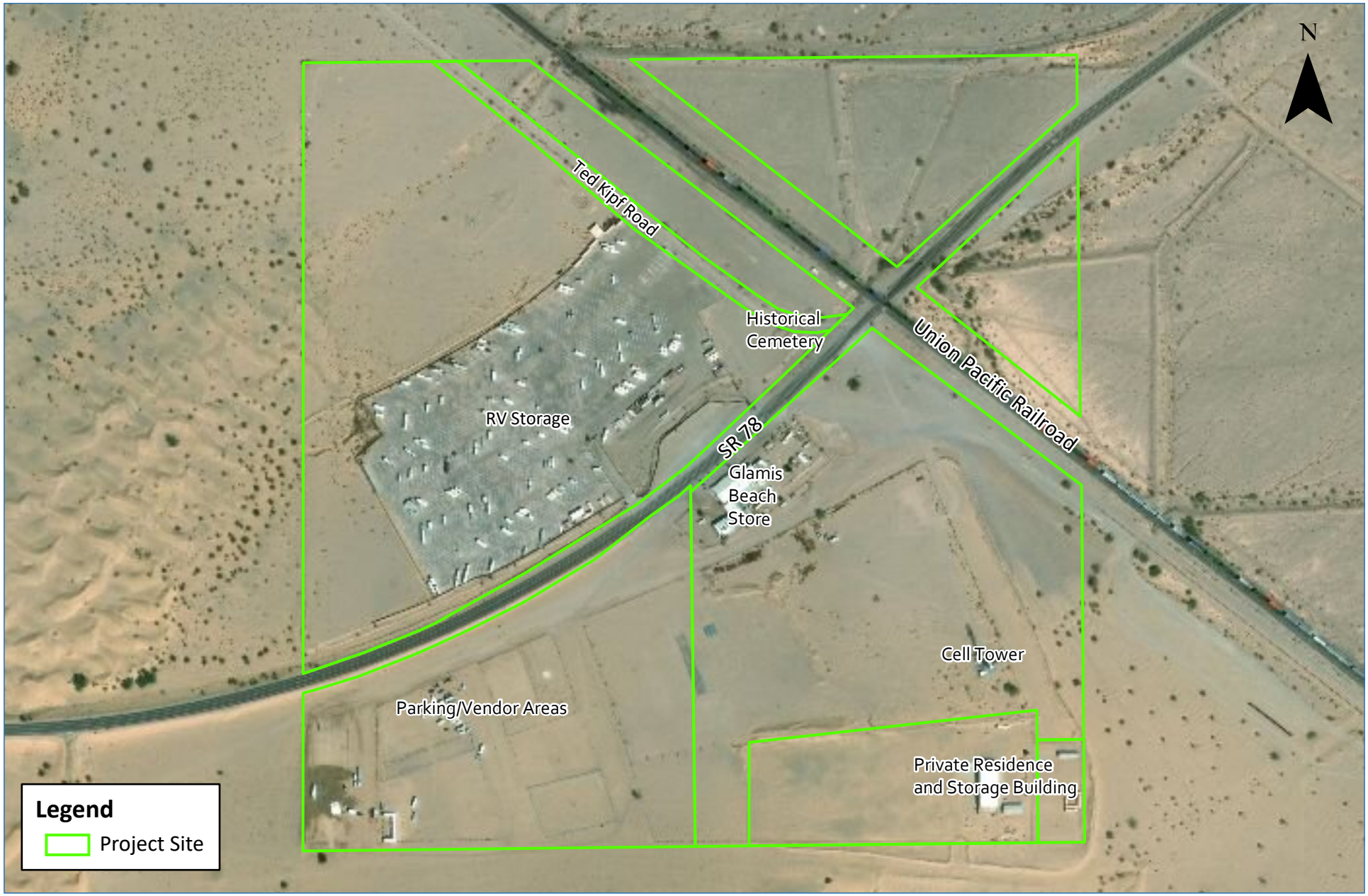
Exhibits

1 IN = 550 FT

Key Observation Points (KOPs)

Exhibit 1

Glamis Specific Plan - Visual Impact Assessment

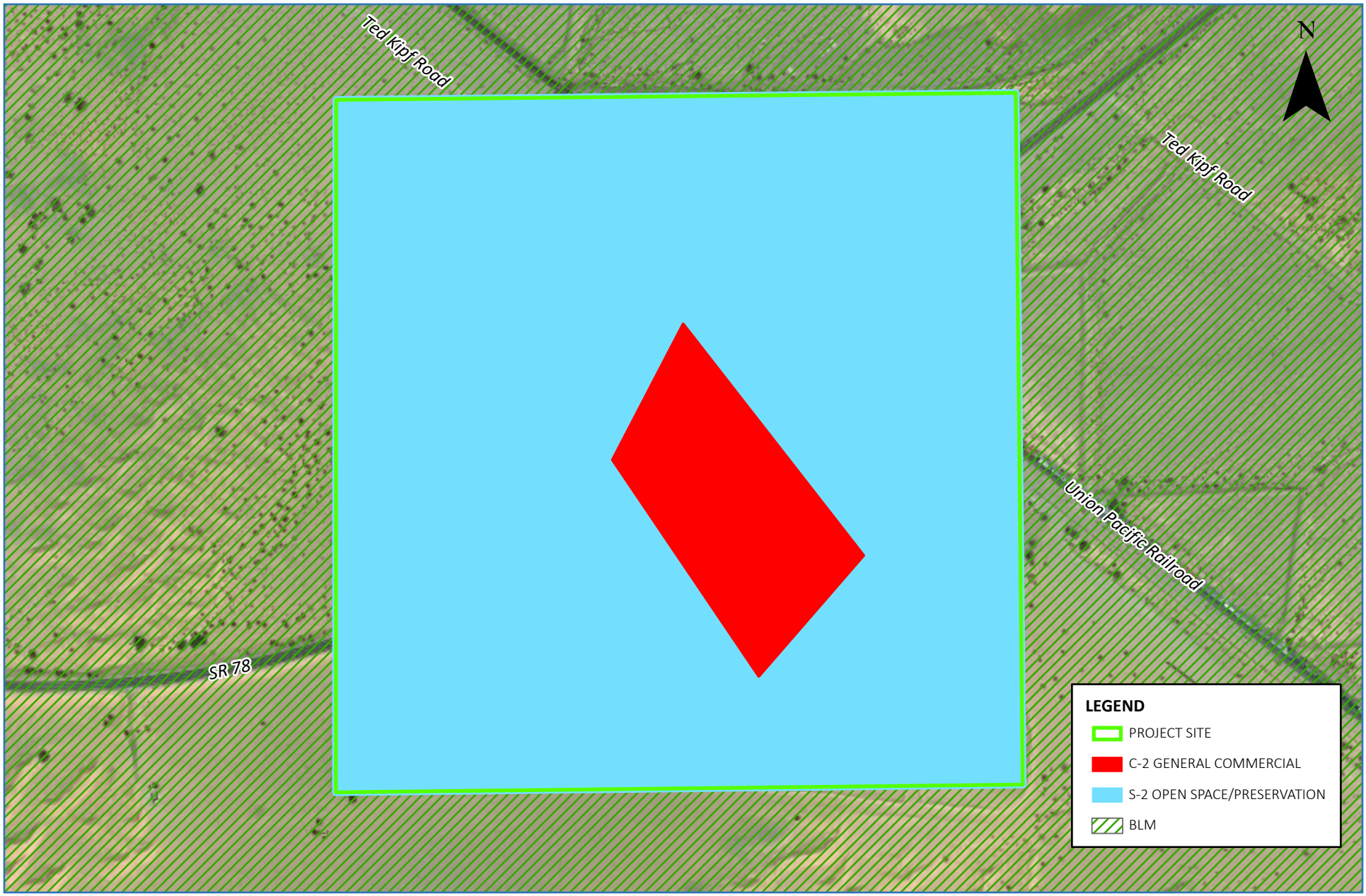


1 IN = 550 FT

Existing Land Use

Exhibit 2

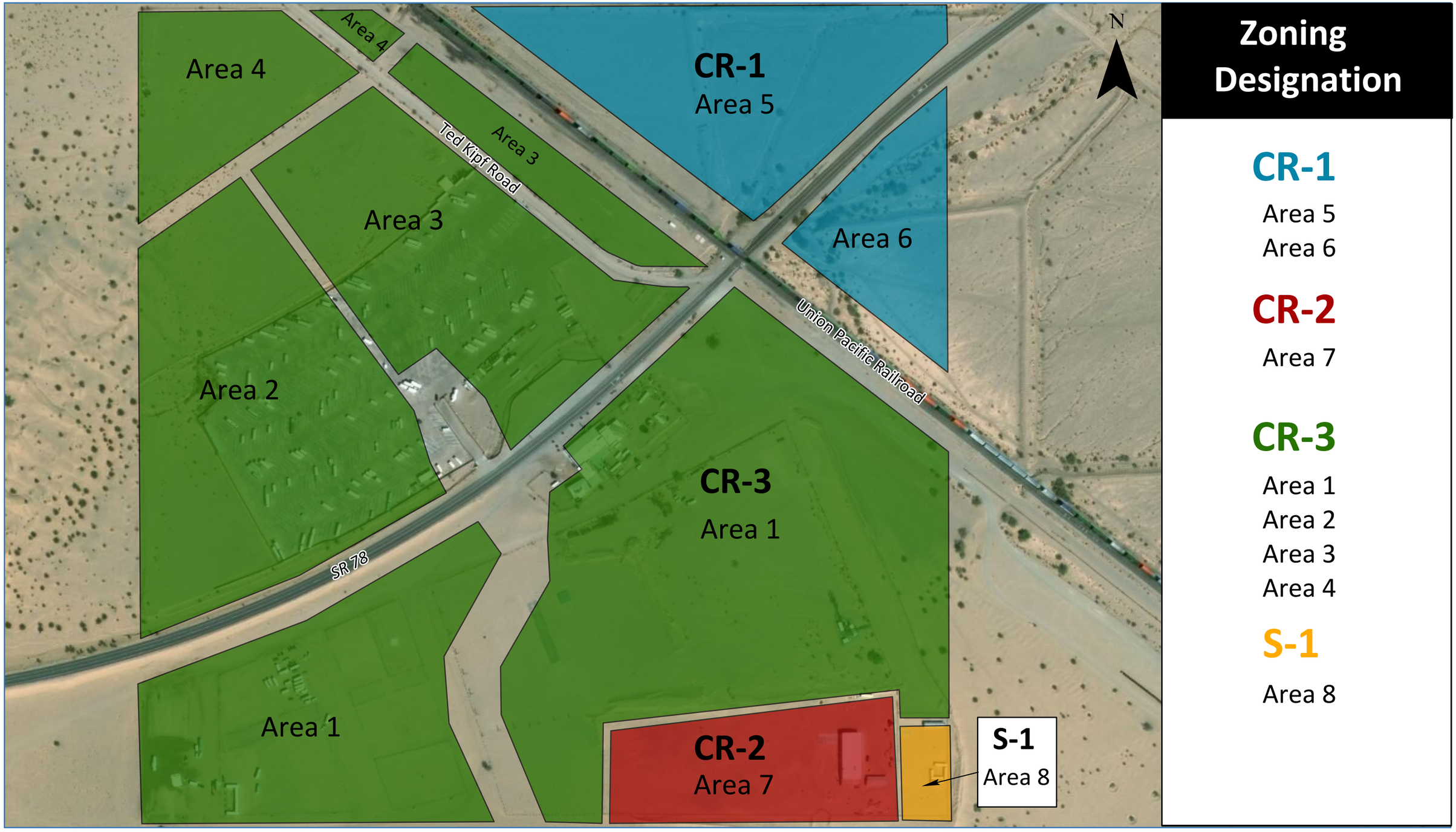
Glamis Specific Plan - Visual Impact Assessment



1 IN = 625 FT

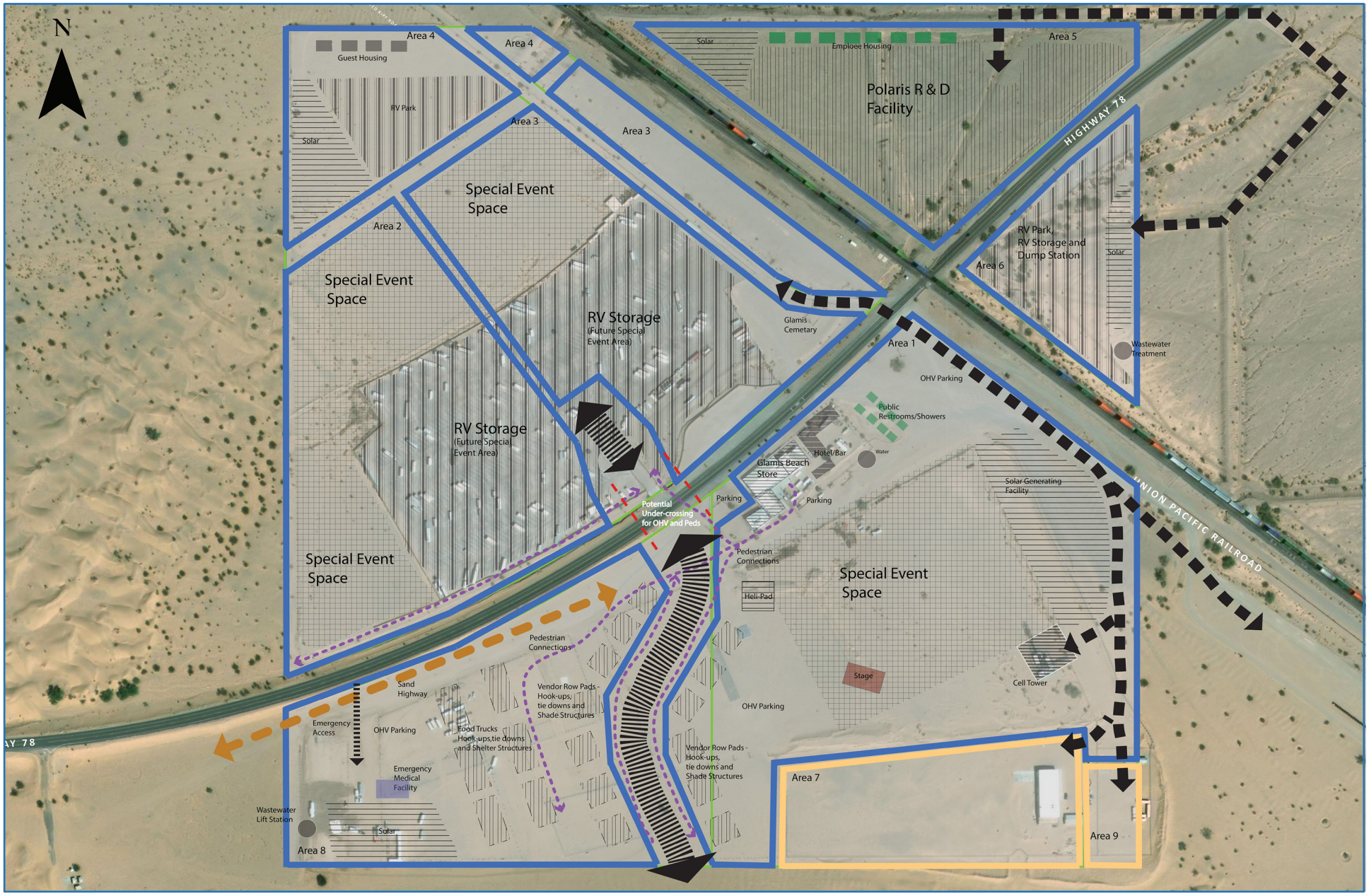
Current Imperial County Zoning - Project Site

Exhibit 3



1 IN = 400 FT

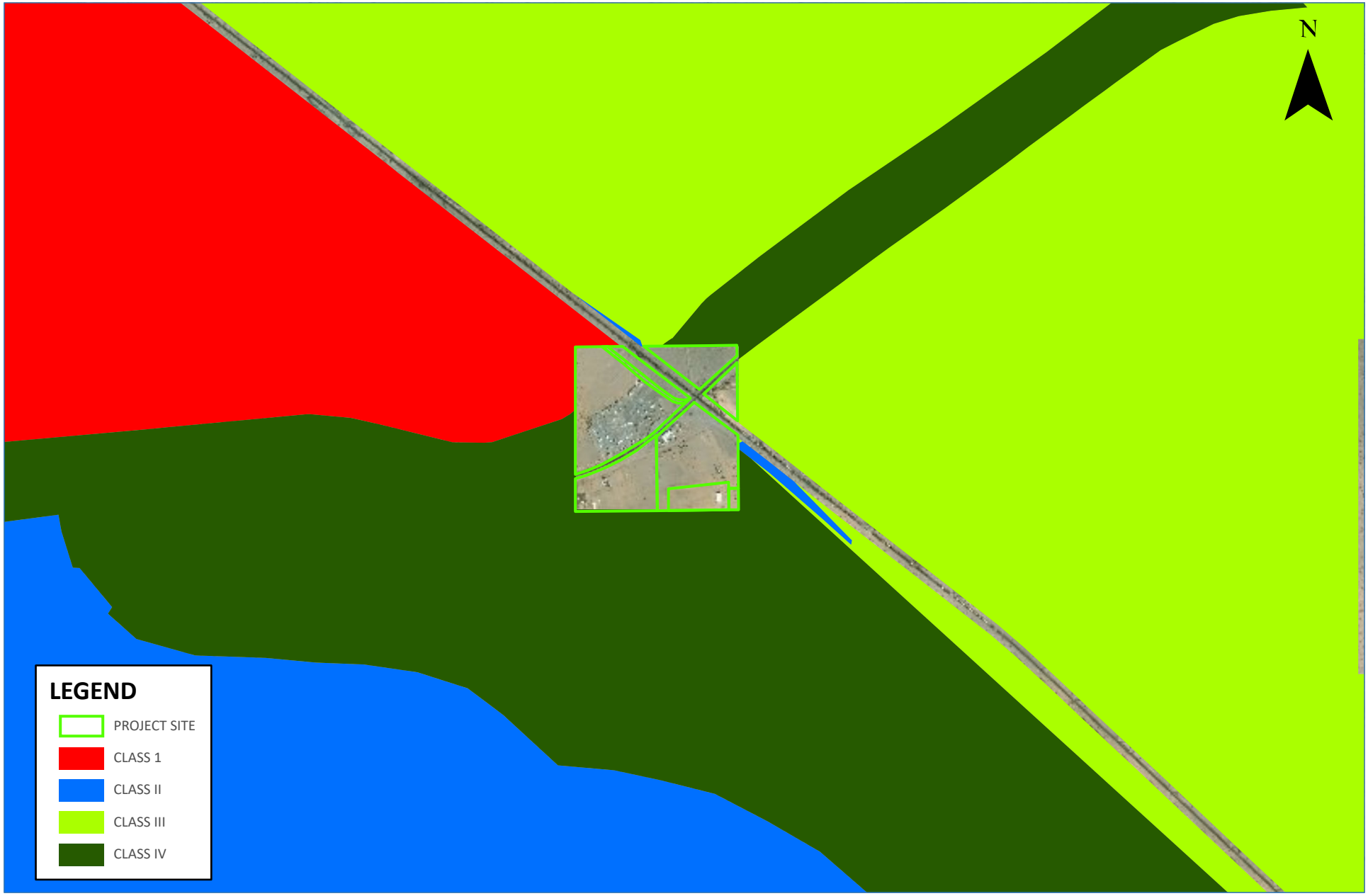
Zoning Designations and Planning Areas



Conceptual Site Plan

Exhibit 5

Glamis Specific Plan - Visual Impact Assesment



1 IN = 0.5 MI

Project VRI Classifications

Exhibit 6

KOP 1 Facing South

Exhibit 7

KOP 2 Facing Southeast

Exhibit 8

Glamis Specific Plan - Visual impact Assesment

KOP 3 Facing West

Exhibit 9

Glamis Specific Plan - Visual impact Assesment

KOP 4 Facing Northwest

Exhibit 10

Glamis Specific Plan - Visual impact Assesment

KOP 5 Facing Southwest

Exhibit 11

Glamis Specific Plan - Visual impact Assesment

Appendix B

Contrast Rating Worksheets

Form 8400-4
(September 1985)

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

VISUAL CONTRAST RATING WORKSHEET

Date 9/9/2019

District Unincorporated Imperial County

Resource Area

Activity (program) N/A

SECTION A. PROJECT INFORMATION

1. Project Name: Glamis Specific Plan

2. Key Observation Point: #1

3. VRM Class: VRI Class IV

4. Location
Township 13S
Range 18E
Section 33

5. Location Sketch

SECTION B. CHARACTERISTIC LANDSCAPE DESCRIPTION

	1. LAND/WATER	2. VEGETATION	3. STRUCTURES
FORM	flat to rolling terrain	regular and small	weak and few
LINE	Simple, parallel, straight	regular and simple	Straight, broken
COLOR	light brown to light tan	light brown/green	grey and white
TEXTURE	Discontinuous,smooth,fine	Patchy, dotted	Medium,continuous

SECTION C. PROPOSED ACTIVITY DESCRIPTION

	1. LAND/WATER	2. VEGETATION	3. STRUCTURES
FORM	flat to rolling terrain	regular and small	weak and few
LINE	Simple, parallel, straight	regular and simple	Straight, broken
COLOR	light brown to light tan	light brown/green	grey and white
TEXTURE	Discontinuous,smooth,fine	Patchy, dotted	Medium,continuous

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			✓				✓				✓	
Line			✓				✓				✓	
Color			✓					✓			✓	
Texture			✓					✓			✓	

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)

Evaluator's Names: Max Antono, Chris Moore

Date: 03/25/2020

Rel. 8-30
1/17/86

Form 8400-4
(September 1985)

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

VISUAL CONTRAST RATING WORKSHEET

Date 9/9/2019

District Unincorporated Imperial County

Resource Area

Activity (program) N/A

SECTION A. PROJECT INFORMATION

1. Project Name: Glamis Specific Plan

2. Key Observation Point: #2

3. VRM Class: VRI Class IV

4. Location
Township 13S
Range 18E
Section 34

5. Location Sketch

SECTION B. CHARACTERISTIC LANDSCAPE DESCRIPTION

	1. LAND/WATER	2. VEGETATION	3. STRUCTURES
FORM	flat to rolling terrain	regular and small	weak and few
LINE	Simple and smooth	regular and simple	straight
COLOR	light brown to light tan	light brown/green	grey and white
TEX-TURE	Smooth and fine	Clumped and patchy	Continuous

SECTION C. PROPOSED ACTIVITY DESCRIPTION

	1. LAND/WATER	2. VEGETATION	3. STRUCTURES
FORM	flat to rolling terrain	regular and small	weak and few
LINE	Simple and smooth	regular and simple	straight
COLOR	light brown to light tan	light brown/green	grey and white
TEX-TURE	Smooth and fine	Clumped and patchy	Continuous

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			✓				✓				✓	
Line			✓				✓				✓	
Color			✓					✓			✓	
Texture			✓					✓			✓	

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)

Evaluator's Names: Max Antono, Chris Moore

Date: 03/25/2020

Rel. 8-30
1/17/86

Form 8400-4
(September 1985)

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

VISUAL CONTRAST RATING WORKSHEET

Date 9/9/2019

District Unincorporated Imperial County

Resource Area

Activity (program) N/A

SECTION A. PROJECT INFORMATION

1. Project Name: Glamis Specific Plan

2. Key Observation Point: #3

3. VRM Class: VRI Class I

4. Location
Township 13S
Range 18E
Section 34

5. Location Sketch

SECTION B. CHARACTERISTIC LANDSCAPE DESCRIPTION

	1. LAND/WATER	2. VEGETATION	3. STRUCTURES
FORM	flat to rolling terrain	regular and few	weak and few
LINE	Simple and smooth	regular and simple	straight
COLOR	light brown to light tan	Dark green/brown	grey and white
TEX-TURE	Smooth and fine	Sparse	Clumped

SECTION C. PROPOSED ACTIVITY DESCRIPTION

	1. LAND/WATER	2. VEGETATION	3. STRUCTURES
FORM	flat to rolling terrain	regular and few	weak and few
LINE	Simple and smooth	regular and simple	straight
COLOR	light brown to light tan	Dark green/brown	grey and white
TEX-TURE	Smooth and fine	Sparse	Clumped

SECTION D. CONTRAST RATING ☐ SHORT TERM ☐ LONG TERM

1. DEGREE OF CONTRAST

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

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)

Evaluator's Names: Max Antono, Chris Moore

Date: 03/25/2020

Rel. 8-30
1/17/86

Form 8400-4
(September 1985)

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

VISUAL CONTRAST RATING WORKSHEET

Date 9/9/2019

District Unincorporated Imperial County

Resource Area

Activity (program) N/A

SECTION A. PROJECT INFORMATION

1. Project Name: Glamis Specific Plan

2. Key Observation Point: #4

3. VRM Class: VRI Class I/Unclassified

4. Location
Township 13S
Range 18E
Section 33

5. Location Sketch

SECTION B. CHARACTERISTIC LANDSCAPE DESCRIPTION

	1. LAND/WATER	2. VEGETATION	3. STRUCTURES
FORM	flat terrain	Few and regular	weak and few
LINE	Simple and smooth	regular and simple	straight
COLOR	light tan	dark green	grey and white
TEXTURE	Smooth and fine	Straight and continuous	Dotted

SECTION C. PROPOSED ACTIVITY DESCRIPTION

	1. LAND/WATER	2. VEGETATION	3. STRUCTURES
FORM	flat terrain	Few and regular	weak and few
LINE	Simple and smooth	regular and simple	straight
COLOR	light tan	dark green	grey and white
TEXTURE	Smooth and fine	Straight and continuous	Dotted

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			✓				✓				✓	
Line			✓				✓				✓	
Color			✓					✓			✓	
Texture			✓					✓			✓	

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)

Evaluator's Names: Max Antono, Chris Moore

Date: 03/25/2020

Rel. 8-30
1/17/86

Form 8400-4
(September 1985)

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

VISUAL CONTRAST RATING WORKSHEET

Date 9/9/2019

District Unincorporated Imperial County

Resource Area

Activity (program) N/A

SECTION A. PROJECT INFORMATION

1. Project Name: Glamis Specific Plan

2. Key Observation Point: #5

3. VRM Class: VRI Class II and IV

4. Location
Township 13S
Range 18E
Section 33

5. Location Sketch

SECTION B. CHARACTERISTIC LANDSCAPE DESCRIPTION

	1. LAND/WATER	2. VEGETATION	3. STRUCTURES
FORM	flat and irregular terrain	regular and small	weak and few
LINE	Simple and jagged	regular and simple	straight
COLOR	light brown to light tan	light brown/green	grey
TEXTURE	Smooth and fine	sparse	Random

SECTION C. PROPOSED ACTIVITY DESCRIPTION

	1. LAND/WATER	2. VEGETATION	3. STRUCTURES
FORM	flat and irregular terrain	regular and small	weak and few
LINE	Simple and jagged	regular and simple	straight
COLOR	light brown to light tan	light brown/green	grey
TEXTURE	Smooth and fine	sparse	Random

SECTION D. CONTRAST RATING ☐ SHORT TERM ☐ LONG TERM

1. DEGREE OF CONTRAST

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

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)

Evaluator's Names: Max Antono, Chris Moore

Date: 03/25/2020

Rel. 8-30
1/17/86