

APPENDIX 6

*Visual Resource Consistency Tables**

** This appendix has been updated since publication in the Draft EIR/EIS. Changes are shown in ~~strikethrough~~-underline.*

**Table 6-1
Consistency Analysis with Applicable Visual Resource Plans, Policies, and Regulations for
the Proposed ECO Substation Project**

Federal Land Use Plans, Policies, and Regulations

Applicable Land Use Plan, Policy, or Regulation	Consistency Determination
<i>BLM Eastern San Diego County Resource Management Plan</i>	
<i>BLM's Visual Resource Management Classifications</i>	
East of the ECO Substation, a 1.5-mile segment of the ECO Substation Project's 138 kV transmission line would traverse the Airport Mesa Resource Management Zone, a BLM-administered area designated visual resource management (VRM) Class III. The objective of Class III is to partially retain the existing character of the landscape. The level of change to the characteristic landscape should be moderate. Management activities may attract attention but should not dominate the view of the casual observer. Changes should repeat the basic elements found in the predominant natural features of the characteristic landscape.	The siting of a 1.5-mile segment of (between MP 0.1 and 1.6) the 138 kV transmission line within the Airport Mesa Recreation Management Zone would be consistent with VRM Class III management objectives for that area. Aside from the transmission line's location within the BLM's only utility corridor within the Eastern San Diego Planning Area, the transmission line would be located adjacent to the existing SWPL and would, therefore, not represent a substantial visual change in the existing visual landscape (i.e., changes in line, form, color, and texture with existing landscape character would essentially be weak to moderate in comparison with the larger SWPL facility). Consequently, construction and operation of the 138 kV transmission line within the Airport Mesa Recreation Management Zone would be consistent with VRM Class III management objectives. Therefore, the ECO Substation Project would be consistent with this policy.
<i>Visual Resources Management Element</i>	
Visual Resource Management (Management Action) VRM-02: Incorporate design considerations to minimize potential impacts to visual values of public lands into all surface-disturbing activities, regardless of size. Emphasis will be on BLM providing input during the initial planning and design phase to minimize costly redesign and mitigation at a later time.	The 1.5-mile segment of the 138 kV transmission line under BLM jurisdiction would be located adjacent to the SWPL and would be located within the BLM's only utility corridor in the planning area. Siting the 138 kV transmission line adjacent to the SWPL would minimize the anticipated visual contrast of surface-disturbing activities by using existing access roads to the extent feasible. Mitigation Measure VIS-3d and VIS-3e would also minimize the visual impacts of surface disturbances by siting access roads in a manner that minimizes their visibility on hillsides. Therefore, the ECO Substation Project would be consistent with this policy.
Visual Resource Management (Management Action) VRM-03: Evaluate proposed surface-disturbing projects from KOPs for the following factors: distance (between project and KOPs), angle of observation, length of time the proposed project will be in view, relative size or scale, season of use, light conditions, recovery time, spatial relationships, atmospheric conditions, and motion.	The visual impacts associated with the 1.5-mile segment of the 138 kV transmission line under BLM jurisdiction was evaluated from Old Highway 80 near the Airport Mesa Recreation Management Zone. The impact analysis from this KOP considered viewer types, and viewer exposure. The analysis considered the relative size and scale of the ECO Substation 138 kV transmission line, light conditions, recovery time, spatial relationships, atmospheric conditions, and motion (e.g., construction activities). Therefore, the visual analysis associated with the 1.5-mile segment of the 138 kV transmission line under BLM jurisdiction would be consistent with this management action.
Visual Resource Management (Management Action) VRM-04: Use visual resource design techniques and best management practices (BMPs) to mitigate the potential for short- and long-term visual impacts from other uses and activities.	APMs and mitigation measures have been proposed for the ECO Substation Project to mitigate the potential for short- and long-term visual impacts (see Section D.3.3.3). Therefore, the ECO Substation Project would be consistent with this policy.

Table 6-1 (Continued)

Local Land Use Plans and Regulations

Applicable Visual Resource Plan, Policy, or Regulation	Consistency Determination
County of San Diego Adopted General Plan–Conservation Element	
<p>Astronomical Dark Sky Policy 1 (X-86): The County of San Diego will act to minimize the impact of development on the useful life of the observatories.</p> <p>Astronomical Dark Sky Policy 1 (X-86), Action Program Action Program 1.2): Amend appropriate ordinances to control sources of light that adversely affect Palomar and Mount Laguna Observatories.</p>	<p>Long-term night lighting impacts at the ECO and Boulevard substations would be minimized through implementation of a Lighting Mitigation Plan (MM VIS-4a) which would be reviewed for consistency with the County of San Diego Light Pollution Code (Section 59.100 et. al) and Sections 6322 and 6324 of the Zoning Ordinance. Therefore, with implementation of mitigation, night lighting and dark sky impacts would be minimized and the ECO Substation Project would be consistent with this policy.</p>
County of San Diego General Plan Update–Conservation and Open Space Element	
<p>Goal COS-11: Preservation of Scenic Resources. Preservation of scenic resources, including vistas of important natural and unique features, where visual impacts of development are minimized.</p>	<p>The ECO Substation and 138 kilovolt (kV) transmission line would be visible from the Table Mountain Area of Critical Environmental Concern (ACEC), identified in Section D.3, Visual Resources, as a scenic vista. Due to distance and back-screening provided by the Sierra de Juarez Mountains, the visual contrast resulting from the substation and the 138 kV transmission line would not be overly strong. In addition, San Diego Gas & Electric (SDG&E) has proposed measures (applicant proposed measures (APMs)) and would implement mitigation to reduce (to the extent feasible) the severity of visual impacts associated with construction and operation of the ECO Substation Project (see Section D.3.3.3 for applicable mitigation measures). Therefore, with implementation of mitigation, the ECO Substation Project would be consistent with this policy.</p>
<p>Policy COS-11.1: Protection of Scenic Resources. Require the protection of scenic highways, corridors, regionally significant scenic vistas, and natural features, including prominent ridgelines, dominant landforms, reservoirs, and scenic landscapes.</p> <p>Policy COS-11.2: Scenic Resource Connections. Promote the connection of regionally significant natural features; designated historic landmarks; and points of regional historic, visual, and cultural interest via designated scenic corridors, such as scenic highways and regional trails.</p>	<p>While Old Highway 80 and I-8 are classified as eligible state scenic highways, neither has been officially designated. However, as discussed in Section D.3.3.3, the Draft General Plan Update Conservation and Open Space Element designates I-8 and Old Highway 80 in the project area as County designated scenic highways. The proposed 138 kV transmission line would cross Old Highway 80 (at approximate MP 5.8) and the proposed substation facilities would be visible to motorists travelling on Old Highway 80 (Boulevard Substation rebuild) and I-8 (ECO Substation). <u>Although scenic highway impacts attributed to the 138 kV transmission line would be less than significant due to the presence of the existing 500 kV SWPL, visual impacts associated with the substation facilities as viewed from scenic highway corridors (i.e.; Old Highway 80 and I-8 in the project area) and with implementation of mitigation, could not be further mitigated such that the resulting visual contrasts associated with the substation facilities and the existing landscape (as viewed from Old Highway 80 and I-8 in the project area) would be less than significant minimized to the extent feasible (see Section D.3.3.3 for proposed mitigation that would reduce the anticipated visual contrast of these facilities to the extent feasible). Therefore, even with implementation of mitigation identified in Section D.3.3.3, impacts to scenic highways designated as such by the Draft General</u></p>

Table 6-1 (Continued)

Applicable Visual Resource Plan, Policy, or Regulation	Consistency Determination
	Plan Update Conservation and Open Space Element would <u>not</u> be significant and the ECO Substation Project would <u>not</u> be consistent with these policies.
<p>Policy COS-11.3: Development Siting and Design. Require development within visually sensitive areas to minimize visual impacts and to preserve unique or special visual features, particularly in rural areas, through the following:</p> <ul style="list-style-type: none"> • Creative site planning • Integration of natural features into the project • Appropriate scale, materials, and design to complement the surrounding natural landscape • Minimal disturbance of topography • Clustering of development to preserve a balance of open space vistas, natural features, and community character • Creation of contiguous open-space networks. 	The existing visual landscape in the project area is predominantly natural in character and nearly devoid of large-scale industrial and residential development (exceptions are the SWPL 500kV transmission line and residential communities of Boulevard and Jacumba). The visual impacts associated with the ECO Substation Project would be minimized by siting the ECO Substation outside of an established community and by locating the 138 kV transmission line adjacent to SWPL between the ECO Substation and MP 9.0. In addition, landscape plantings around the ECO Substation and rebuilt Boulevard Substation (SDG&E has prepared conceptual landscape plans for the substation facilities) would minimize the amount of light trespass emanating from facilities onto surrounding properties. Also, recontouring around the rebuilt Boulevard Substation would buffer views of the substation from motorists on Old Highway 80. Therefore, because SDG&E would implement APMs and Mitigation Measures to minimize the visual impacts resulting from the ECO Substation Project, the Project would be consistent with this policy.
<p>Policy COS-11.4: Collaboration with Agencies and Jurisdictions. Coordinate with adjacent federal and state agencies and local jurisdictions to protect scenic resources and corridors that extend beyond the County’s land use authority but are important to the welfare of County residents.</p>	With the exception of a 1.5-mile segment of the 138 kV transmission line, the ECO Substation Project would under the land use jurisdiction of the CPUC. SDG&E has coordinated with the Bureau of Land Management (BLM) to ensure that the proposed 138 kV transmission line would be located in the Eastern San Diego Resource Planning Area’s only designated utility corridor, and that the 138 kV transmission line would be consistent with the applicable visual resource policies contained in the BLMs Eastern San Diego County Resource Management Plan (RMP). Therefore, the ECO Substation Project would be consistent with this policy.
<p>Policy COS-11.5: Collaboration with Private and Public Agencies. Coordinate with the California Public Utilities Commission (CPUC), power companies, and other public agencies to avoid siting energy generation, transmission facilities, and other public improvements in locations that impact visually sensitive areas, whenever feasible. Require the design of public improvements within visually sensitive areas to blend into the landscape.</p>	The ECO Substation project applicant (SDG&E) has coordinated with the CPUC with regard to the siting of project components and has proposed measures (APMs) that would reduce the visual impacts associated with construction and operation of project facilities and components. Mitigation has been proposed (see Section D.3.3.3) which minimize visual contrasts to the extent feasible. Therefore, with implementation of mitigation, the ECO Substation Project would be consistent with this policy.
<p>Policy COS-11.7: Underground Utilities. Require new development to place utilities underground and encourage “undergrounding” in existing development to maintain viewsheds, reduce hazards associated with hanging lines and utility poles, and to keep pace with current and future technologies.</p>	The proposed ECO Substation Project includes a 13.3-mile, overhead 138 kV transmission line that would be supported by over 100 steel tangent poles. Policy COS-11.7 pertains to utility lines which are generally defined as distribution lines (less than 34kV), rather than transmission lines. Consequently, this policy does not pertain to the ECO Substation Project.
<p>Goal COS-12: Preservation of Ridgelines and Hillsides. Ridgelines and steep hillsides are preserved for their character and scenic value.</p>	Components of the ECO Substation Project would not parallel or cross major ridgelines or be located parallel to or on steep hillsides. Therefore, the project would not affect preservation efforts regarding

Table 6-1 (Continued)

Applicable Visual Resource Plan, Policy, or Regulation	Consistency Determination
	the character and scenic value of these land features. The ECO Substation Project would, therefore, be consistent with this policy.
<p>Policy COS-12.2: Development Location on Ridges. Require development to preserve and enhance the physical features by being located down and away from ridgelines so that structures are not silhouetted against the sky.</p>	<p>Components of the ECO Substation Project would not generally be located on ridgelines and/or steep hillsides, however, due to the height of transmission line structures, these project components would be silhouetted against the sky where the line crosses open valleys. In addition, the 138 kV transmission line would be constructed adjacent to the existing 500 kV SWPL transmission line to minimize visual impacts (visual impact of the 138 kV transmission line would be less than significant when viewed against the SWPL transmission line). However, as transmission line structures would generally not be located on ridgelines, the ECO Substation Project would be consistent with this policy.</p>
<p>Goal COS-13: Dark Skies. Preserved dark skies that contribute to rural character are necessary for the local observatories.</p> <p>Policy COS-13.1: Restrict Light and Glare. Restrict outdoor light and glare from development projects in Semi-Rural and Rural Lands and designated rural communities to retain the quality of night skies by minimizing light pollution</p>	<p>While night lighting would be used during operations at the ECO Substation and rebuilt Boulevard Substation, mitigation (Mitigation Measure VIS-4a) would be implemented by SDG&E to ensure that permanent lighting is not visible from public viewing areas and that lighting does not cause reflected glare and illumination of project facilities, the general vicinity, and nighttime sky. In addition, Mitigation Measure VIS-4a always requires the CPUC to review the Lighting Mitigation Plan to ensure consistency with the County of San Diego Light Pollution Code (Section 59.100 et. al) and Sections 6322 and 6324 of the County Zoning Ordinance. Therefore, with implementation of mitigation, the ECO Substation Project would be consistent with these these policies.</p>
<p>Policy COS-13.2: Palomar and Mount Laguna Observatories. Minimize, to the maximum extent feasible, the impact of development on the dark skies surrounding Palomar and Mount Laguna observatories to maintain dark skies that are vital to these two world-class observatories by restricting exterior light sources within the impact areas of the observatories.</p> <p>Policy COS-13.3: Collaboration to Retain Night Skies. <u>Coordinate with adjacent federal and State agencies, local jurisdictions, and tribal governments to retain the quality of night skies by minimizing light pollution.</u></p>	<p>SDG&E would implement Mitigation Measure VIS-4a to ensure that permanent substation lighting does not cause reflected glare and illumination of the vicinity so as to affect nighttime viewing opportunities. The ECO Substation and rebuilt Boulevard Substation would be located within Zone B (greater than 15 miles) of the Mount Laguna Observatory and would be subject to the Zone B (Class II Lighting) lamp type and shielding requirements established by Division 9 (Light Pollution Code) of the San Diego County Code. Therefore, consistency with the Light Pollution Code (as required by Mitigation Measure VIS-4a) would ensure the ECO Substation Project would be consistent with this policy.</p>
<i>County of San Diego Draft General Plan Update–Boulevard Subregional Planning Area Community Plan</i>	
<p>Policy LU 1.1.4: Require commercial and public development along scenic and historic routes to apply design standards that will blend the development in with the terrain and rustic south western nature of the community character, while keeping outdoor lighting to an absolute and well shielded minimum.</p>	<p>The rebuilt Boulevard Substation would be constructed east of the existing substation on an adjacent 8.5-acre parcel recently acquired by SDG&E. Visual impacts associated with the facility would be reduced by construction of a manufactured berm at the north end of the substation rebuild site and implementation of the Boulevard Substation Landscape Concept Plan would further minimize visual contrasts associated with the substation as viewed from Old Highway 80 (an eligible state scenic highway and a County historic route). Long-term night lighting impacts at the Boulevard substation</p>

East County Substation/Tule Wind/Energia Sierra Juarez Gen-Tie Projects
APPENDIX 6 – VISUAL RESOURCE CONSISTENCY TABLES

Table 6-1 (Continued)

Applicable Visual Resource Plan, Policy, or Regulation	Consistency Determination
	(visible from Old Highway 80) would be minimized through implementation of a Lighting Mitigation Plan (MM VIS-4a). Therefore, with implementation of mitigation, the ECO Substation Project would be consistent with this policy.
<p>Goal 3.1: Protection as a Dark Sky Community through preservation of the dark skies in Boulevard to support the continued operation of the San Diego Astronomy Association and Tierra Del Sol Observatories and to continue to attract stargazers, photographers, scientists, and researchers from around the world.</p> <p>Policy LU 3.1.1: Encourage development to preserve dark skies with reduced lighting and increased shielding requirements.</p> <p>Policy LU 3.1.2: Encourage increased resources or methods for enforcement for the preservation of dark skies.</p>	<p>Long-term night lighting impacts at the Boulevard substation would be minimized through implementation of a Lighting Mitigation Plan (MM VIS-4a). Mitigation Measure VIS-4a requires that the CPUC review the plan for consistency with the County of San Diego Light Pollution Code and County Zoning Ordinance Section 6322 to 6324. Therefore, with implementation of mitigation, the ECO Substation Project would be consistent with <u>these policies</u>.</p>
County of San Diego General Plan–Mountain Empire Subregional Plan	
<p>Community Character (Policy and Recommendation 2): Development proposals within the Rural Village Boundaries <u>Country Towns</u> should avoid the removal of mature trees.</p>	<p>Development of the rebuilt Boulevard Substation would include the removal of three mature oak trees. While no other project components would result in the removal of mature trees or native oaks, the removal of oak trees at the Boulevard Substation site is unavoidable. However, to reduce impacts resulting with tree removal, SDG&E would implement Mitigation Measure VIS-3m (Tree Replacement Plan) which would transplant existing trees or incorporate new trees at the Boulevard Substation site. Therefore, with implementation of Mitigation Measure VIS-3m, the ECO Substation Project would be consistent with this policy.</p>
<p>Conservation (Environmental Resources, Policy and Recommendation 46): The dark sky is a significant resource for the subregion, and appropriate steps shall be taken to maintain <u>preserve</u> it.</p>	<p>As stated Section D.3.3.3, SDG&E proposes to install 50 300-watt tungsten quartz lights and 14 100-watt yellow floodlights at the ECO Substation and a similar lighting scheme (albeit fewer lights) at the rebuilt Boulevard Substation. Lighting would be used primarily for security during nighttime hours at these facilities. The use of proposed lighting would not be consistent with the San Diego County Light Pollution Code; therefore, as proposed, the ECO Substation Project would not be consistent with this policy. However, Mitigation Measure VIS-4a (Lighting Mitigation Plan) would be implemented at proposed substation facilities to ensure that outdoor nighttime lighting is consistent with the lamp type and shielding requirements of the Light Pollution Code and the glare and light trespass thresholds contained in the County Zoning Ordinance (Section 6322 to 6324). Therefore, with implementation of Mitigation Measure VIS-4a, the ECO Substation Project would be consistent with this policy.</p>
<p>Scenic Highways Goal: Establish a network of scenic highway corridors within which scenic, historical, and recreational resources are protected and enhanced.</p>	<p>Although Old Highway 80 and I-8 are classified as eligible state scenic highways, neither has been officially designated. According to the existing County of San Diego General Plan, I-8 is designated as a third priority scenic route from the El Cajon city limits to the</p>

**East County Substation/Tule Wind/Energia Sierra Juarez Gen-Tie Projects
APPENDIX 6 – VISUAL RESOURCE CONSISTENCY TABLES**

Table 6-1 (Continued)

Applicable Visual Resource Plan, Policy, or Regulation	Consistency Determination
	<p>Imperial County line. Project components including the ECO Substation and 138 kV transmission line would be openly visible to motorists along I-8 between the communities of Boulevard and Jacumba. Due to the bulk and scale of proposed ECO Substation, the facility could not be better screened from the views of motorists and the resulting visual contrast would be strong. Although the 138 kV transmission line would be visible to I-8 motorists, the presence of the 500 kV SWPL would minimize the visual impact and the resulting visual contrast would be relatively weak. Although mitigation has been provided which would minimize visual impacts associated with the ECO Substation (see Section D.3.3.3, VIS-3 discussion for the ECO Substation Project), the resulting visual impact would be significant. Therefore, even with implementation of mitigation provided in Section D.3.3.3, construction and operation of the ECO Substation would <u>not</u> be consistent with this goal.</p>
<p><u>Scenic Highway Policy and Recommendation 1: Mitigate the effects of development located within clear view of a designated scenic corridor.</u></p>	<p><u>Implementation of Mitigation Measure VIS-1a is intended to reduce impacts associated with the ECO 138 kV transmission line at scenic highway crossings. With implementation of Mitigation Measure VIS-1a impacts to scenic corridors would be mitigated to the extent feasible and therefore, the ECO Substation Project would be consistent with this policy.</u></p>
<p><u>Land Use, ___ (Industrial Goal, ___ Policy and Recommendation 6): New industrial development should consider all views into the property from public streets, adjacent properties, and residences on nearby hills.</u></p>	<p>Components of the ECO Substation Project would be visible to area residents and motorists on I-8, Old Highway 80, and local roads within the communities of Boulevard and Jacumba. As discussed in Section D.3, Visual Resources, multiple key observation points (KOPs) were selected to analyze the proposed ECO Substation Project from multiple viewing angles, viewer types, and viewing distances. Therefore, the ECO Substation Project would be consistent with this policy.</p>
<p><u>Land Use, ___ (Industrial Goal, ___ Policy and Recommendation 153): Large, unbroken expanses of wall shall be avoided. If this is not possible, architectural details and/or landscaping shall be used to soften straight, unbroken facades.</u></p>	<p>Chain-link fencing is proposed around the ECO and Boulevard substations. Landscape plantings would also be installed around the perimeters of the proposed substations and would partially screen views of fencing from off-site viewers. Therefore, since unbroken expanses of wall around facilities have not been proposed by SDG&E, the ECO Substation Project would be consistent with this policy.</p>
County of San Diego Zoning Ordinance	
<p>Section 6320 states that that all commercial and industrial operations shall be operated so as to not produce glare that is readily detectable (without instruments) by the average person at or beyond the lot line of the residential lot.</p>	<p>To reduce anticipated glare associated with substation facilities and transmission line structures, SDG&E would implement Mitigation Measures VIS-3h and VIS-3j. These measures include implementation of a Surface Treatment Plan to blend project facilities into the surrounding environment (Mitigation Measure VIS-3h) and the use of dulled-metal-finish transmission structures and non-specular conductors (Mitigation Measure VIS-3j). The implementation of these mitigation measures would reduce glare associated with the substation (and ancillary facilities) and the transmission line (and associated structures); therefore, with implementation of mitigation, the ECO Substation Project would be consistent with this policy.</p>

**East County Substation/Tule Wind/Energia Sierra Juarez Gen-Tie Projects
APPENDIX 6 – VISUAL RESOURCE CONSISTENCY TABLES**

Table 6-1 (Continued)

Applicable Visual Resource Plan, Policy, or Regulation	Consistency Determination
<p>Section 6322 (Outdoor Lighting) controls unnecessary outdoor light emissions that produce unwanted illumination of adjacent properties by restricting outdoor lighting usage.</p>	<p>Lighting at the ECO Substation and rebuilt Boulevard Substation would be installed primarily for security and safety reasons. The implementation of Mitigation Measure VIS-4a would ensure that the visibility of facility lighting is reduced from public viewing areas and nearby residences and that lighting does not cause result in reflected glare. Outdoor lighting usage would be further restricted by the installation of motion switches or detectors to ensure that areas are illuminated only when in use. In addition, Mitigation Measure VIS-4a requires that the Lighting Mitigation Plan be reviewed by the CPUC to ensure consistency with the County of San Diego Light Pollution Code (Section 59.100 et. al) and Sections 6322 and 6324 Therefore, with implementation of mitigation, the ECO Substation Project would be consistent with this policy.</p>
<p>Section 6324 establishes lighting limitations including horizontal cutoff and light trespass. Regarding light trespass, the zoning ordinance states that “the illumination of adjacent premises by spill light shall not exceed a value of 0.2 foot candles measured in the horizontal or vertical plane at a point three feet above grade level and five feet inside the adjacent property.”</p>	<p>The implementation of Mitigation Measure VIS-4 would ensure that facility lighting is not visible from public viewing areas and that lighting does not cause reflected glare. The measure also states that lighting is to be designed such that exterior light fixtures are hooded and directed toward the area to be illuminated (light sources are to be shielded to prevent light trespass outside the project boundary) and that the Lighting Mitigation Plan be consistent with Section 6324 of the County Zoning Ordinance. Therefore, with the implementation of Mitigation Measure VIS-4a, the ECO Substation Project would be consistent with this policy.</p>
County of San Diego Light Pollution Code (Dark Skies Ordinance)	
<p>The Light Pollution Code designates all areas within a 15-mile radius of the Palomar and Mount Laguna observatories as Zone A, and all other areas of the County are designated Zone B. Zone A has more stringent lighting restrictions, including limits on decorative lighting, so that night skies are dark enough for clear viewing through the telescopes at the observatories.</p>	<p>The ECO Substation project would be located in Zone B as measured from the Mount Laguna Observatory. Lamp type and shielding requirements for Class II Lighting within the Zone B area state that lamps should be low-pressure sodium, fully shielded, and that the maximum power of light used shall be 4,050 lumen (the Light Pollution Code states that appropriate lamp types (other than low-pressure sodium lamp types) of 4,050 lumens and below include 150-watt Tungsten-Halogen). As stated Section D.3.3.3, SDG&E proposes to install 50 300-watt tungsten quartz lights and 14 100-watt yellow floodlights at the ECO Substation and a similar lighting scheme (albeit fewer lights) at the rebuilt Boulevard Substation. The use of proposed lighting would not be consistent with the San Diego County Light Pollution Code; therefore, as proposed, the ECO Substation Project would not be consistent with this policy. However, Mitigation Measure VIS-4a would be implemented to ensure that outdoor nighttime lighting is consistent with the lamp type and shielding requirements of the Light Pollution Code. Therefore, with implementation of mitigation, the ECO Substation project would be consistent with the County of San Diego Light Pollution Code.</p>

Table 6-2
Consistency Analysis with Applicable Land Use Plans, Policies, or Regulations for the
Proposed Tule Wind Project

Federal Land Use Plans, Policies, or Regulations

Applicable Visual Resource Plan, Policy, or Regulation	Consistency Determination
<i>BLM Eastern San Diego County Resource Management Plan</i>	
<i>BLM's Visual Resource Management Classifications</i>	
<p>Portions of the Proposed PROJECT located on BLM-administered lands have established VRM Classifications (these classifications are identified in the BLM's Eastern San Diego Resource Management Plan discussed in subsequent text). The majority of the Tule Wind Project site would be located within an area of the McCain National Cooperative Land and Wildlife Management Area designated by the BLM as VRM Class IV (this area includes the Lark Canyon Off Highway Vehicle (OHV) area and the Lark Canyon and the Cottonwood campgrounds). South of Rough Acres Ranch and along McCain Valley Road, the proposed 138 kV transmission line would traverse land adjacent to a discontinuous parcel of BLM-administered land (identified as McCain Valley West in the Eastern San Diego County RMP) designated VRM Class IV.</p>	<p>The Tule Wind Project would be primarily located on BLM-administered lands in the McCain National Cooperative Land and Wildlife Management Area. The BLM portion of the project area was designated as Visual Resource Management (VRM) Class IV lands in the Eastern San Diego County Resource Management Plan (RMP (BLM 2008)). The VRM Class IV objective is to provide for management activities that require major modifications of the existing character of the landscape. In addition, the level of change to the characteristic landscape can be high, and the management activities may dominate the view and be the major focus of viewer attention. However, every attempt should be made to minimize the impact of these activities through careful location, minimal disturbance, and repeating the basic elements.</p> <p>While the Tule Wind Project would certainly change the visual character of the project area, such change is permitted by the BLM; and while the level of the change to the landscape would be high, major modification of the characteristic landscape is permitted within VRM Class IV designated lands. In addition, the Tule Wind Project would be located on land made available by the BLM for wind energy development. Therefore, Tule Wind Project components located on BLM-administered lands would be consistent with the VRM Class IV objectives.</p>
<i>Visual Resources Management Element</i>	
<p>Visual Resource Management (Management Action) VRM-02: Incorporate design considerations to minimize potential impacts to visual values of public lands into all surface-disturbing activities, regardless of size. Emphasis will be on BLM providing input during the initial planning and design phase to minimize costly redesign and mitigation at a later time.</p>	<p>Project components located on BLM jurisdictional land would be located on lands made available for wind energy development and designated VRM Class IV by the BLM in the 2008 RMP. In addition, Pacific Wind Development Tule Wind LLC has proposed measures and would implement mitigation to minimize (to the extent feasible) the visual impacts resulting from construction and operation of the Tule Wind Project (see Section D.3.3.3 for mitigation measures). Therefore, with implementation of mitigation, Tule Wind Project components located on BLM-administered lands would be consistent with this policy.</p>
<p>Visual Resource Management (Management Action) VRM-03: Evaluate proposed surface-disturbing projects from KOPs for the following factors: distance (between project and KOPs), angle of observation, length of time the proposed project will be in view, relative size or scale, season of use, light conditions, recovery time, spatial relationships, atmospheric conditions, and motion.</p>	<p>The visual impacts associated with the Tule Wind Project have been evaluated from multiple KOPs which considered various distances, angles of observation, viewer types, and viewer exposure. Therefore, Tule Wind Project components located on BLM-administered lands would be consistent with this policy.</p>

Table 6-2 (Continued)

Applicable Visual Resource Plan, Policy, or Regulation	Consistency Determination
<p>Visual Resource Management (Management Action) VRM-04: Use visual resource design techniques and BMPs to mitigate the potential for short- and long-term visual impacts from other uses and activities.</p>	<p>APMs and mitigation measures have been proposed for the Tule Wind Project (including project components under BLM jurisdiction) to minimize potential short- and long-term visual impacts (see Section D.3.3.3). Therefore, with implementation mitigation identified in Section D.3.3.3 which would minimize visual impacts to the extent feasible, Tule Wind Project components under the BLM's jurisdiction would be consistent with this policy.</p>
<p>Federal Aviation Administration (FAA) Advisory Circular 70/7460-1K: Obstruction Marking and Lighting</p>	
<p>Chapter 2: General Requirements</p>	
<p>Any temporary or permanent structure, including all appurtenances, that exceeds an overall height of 200 feet (61m) above ground level (AGL) or exceeds any obstruction standard contained in 14 CFR part 77, should normally be marked and/or lighted.</p>	<p>The tallest structures proposed on site (wind turbines measured from base to blade tip) would be approximately 492 feet high. Therefore, wind turbines would be required to include obstruction lighting. As identified in Section D.3.3.3, Pacific Wind Development Tule Wind LLC is proposing to install standard flashing red (L864) or white (L865) lighting on each turbine positioned at each end of the turbine line or string. To reduce anticipated nighttime lighting impacts, Mitigation Measure VIS-4b would require Tule Wind LLC to would incorporate the Obstacle Collision Avoidance System (OCAS) onto proposed wind turbines; however, the OCAS and other Audio Visual Warning Systems (AVWS) are not currently FAA-approved forms of wind turbine marking and lighting and the FAA has determined that the OCAS provides an equivalent level of safety to the marking and lighting of obstacles as recommended in FAA AC C70/7460-1K approved by the FAA for installation on wind turbine farms (the FAA is currently studying their application and expects to have standards regarding the use of AVWS in place by the end of 2011). Therefore, proposed wind turbines would be required to incorporate lighting and marking and with implementation of Mitigation Measure VIS-4b (incorporate the OCAS onto proposed wind turbines). As proposed, Tule Wind LLC would install obstruction lighting on wind turbines that would comply with FAA regulations and therefore, the Tule Wind Project would be consistent with the identified general requirements of Chapter 2.</p>
<p>Chapter 13: Marking and Lighting Wind Turbine Farms</p>	
<p>131. General Standards a. Not all wind turbine units within an installation or farm need to be lighted. Definition of the periphery of the installation is essential; however, lighting of interior wind turbines is of lesser importance unless they are taller than the peripheral units. b. Obstruction lights within a group of wind turbines should have unlighted separations or gaps of no more than 0.50-statute mile if the integrity of the group appearance is to be maintained. This is especially critical if the arrangement of objects is essentially linear.</p>	<p>See Refer to comment to Chapter 2, General Requirements, consistency determination above. Tule Wind LLC is proposing to install standard flashing red (L864) or white (L865) lighting on each turbine positioned at each end of the turbine line or string. Pacific Wind Development would incorporate the OCAS onto proposed wind turbines and the OCAS has been identified by the FAA as an approved alternative to the lighting and marking standards identified in AC 70/7460-1K. In addition, Pacific Wind Development Tule Wind LLC has indicated that wind turbine units would be painted with low-reflectivity and neutral white finishes. Therefore, with implementation of the OCAS installation of proposed obstruction lighting onto proposed wind turbines and with incorporation of finishes consistent with those recommended for wind turbine units</p>

Table 6-2 (Continued)

Applicable Visual Resource Plan, Policy, or Regulation	Consistency Determination
<p>c. Any array of flashing or pulsed obstruction lighting should be synchronized or flash simultaneously.</p> <p>d. Nighttime wind turbine obstruction lighting should consist of the preferred FAA L-864 aviation red-colored flashing lights.</p> <p>e. White strobe fixtures (FAA L-865) may be used in lieu of the preferred L-864 red flashing lights, but must be used alone without any red lights, and must be positioned in the same manner as the red flashing lights.</p> <p>f. The white paint most often found on wind turbine units is the most effective daytime early warning device. Other colors, such as light gray or blue, appear to be significantly less effective in providing daytime warning. Daytime lighting of wind turbine farms is not required, as long as the turbine structures are painted in a bright white color or light off-white color most often found on wind turbines.</p>	<p>by the FAA, the Tule Wind Project would be consistent with Chapter 13, Section 131 General Standards.</p>
<p>133. Marking Standards The bright white or light off-white paint most often found on wind turbines has been shown to be most effective, and if used, no lights are required during the daytime. However, if darker paint is used, wind turbine marking should be supplemented with daytime lighting, as required.</p>	<p>See response to Section 131, General Standards, above. The Tule Wind Project would be consistent with the FAA marking standards as they relate to wind turbine farms.</p>
<p>133. Marking Standards The bright white or light off-white paint most often found on wind turbines has been shown to be most effective, and if used, no lights are required during the daytime. However, if darker paint is used, wind turbine marking should be supplemented with daytime lighting, as required.</p>	<p>See response to Section 131, General Standards, above. Therefore, the Tule Wind Project would be consistent with the FAA marking standards as they relate to wind turbine farms.</p>
<p>134. Lighting Standards</p> <p>a. Flashing red (L864), or white (L-865) lights may be used to light wind turbines. Studies have shown that red lights are most effective, and should be the first consideration for lighting recommendations of wind turbines.</p> <p>c. Linear Turbine Configuration. Place a light on each turbine positioned at each end of the line or string of turbines. Lights should be no more than ½ statute mile, or 2640 feet from the last lit turbine. In the event the last segment is significantly short, push the lit turbines back towards the starting point to present a well balanced string of lights. High concentrations of lights should be avoided.</p>	<p>See response to Chapter 2, General Requirements, above. <u>Tule Wind LLC is proposing to install standard flashing red (L864) or white (L865) lighting on each turbine positioned at each end of the turbine line or string and therefore, With implementation of the FAA-approved OCAS onto wind turbines units, the Tule Wind Project would be consistent with the lighting standard established in Chapter 13, Section 134 (Lighting Standards).</u></p>

Table 6-2 (Continued)

Local Plans, Policies, or Regulations

Applicable Visual Resource Plan, Policy, or Regulation	Consistency Determination
<i>County of San Diego Draft General Plan Update–Conservation and Open Space Element</i>	
<p>Goal COS-11: Preservation of Scenic Resources. Preservation of scenic resources, including vistas of important natural and unique features, where visual impacts of development are minimized.</p>	<p>The anticipated visual impacts on scenic vistas resulting from the Tule Wind Project are discussed in Section D.3.3.3 under Impact VIS-1. As discussed in Section D.3.3.3, the Tule Wind Project would result in significant impacts to scenic vistas where the 138 kV transmission line crosses I-8 and Old Highway 80 where turbines would be visible from trails and pathways included in the Boulevard Community Trails and Pathways Plan. Impacts to scenic vistas would be minimized to the extent feasible through implementation of Mitigation Measures VIS-1a, VIS-1b, and VIS-1c. Therefore, with implementation of mitigation, components of the Tule Wind Project under the County's jurisdiction would be consistent with this policy.</p>
<p>Policy COS-11.1: Protection of Scenic Resources. Require the protection of scenic highways, corridors, regionally significant scenic vistas, and natural features, including prominent ridgelines, dominant landforms, reservoirs, and scenic landscapes.</p> <p>Policy COS-11.2: Scenic Resource Connections. Promote the connection of regionally significant natural features; designated historic landmarks; and points of regional historic, visual, and cultural interest via designated scenic corridors, such as scenic highways and regional trails.</p>	<p>While Old Highway 80 and I-8 are classified as eligible state scenic highways, neither has been officially designated. However, as discussed in Section D.3.3.3, the Draft General Plan Update Conservation and Open Space Element designates I-8 and Old Highway 80 in the project area as County designated scenic highways and project components including the 138 kV transmission line would cross I-8 and would cross and be located adjacent to Old Highway 80 from McCain Valley Road to the rebuilt Boulevard Substation. In addition, wind turbines R-11 and R-12 (wind turbines under the County's jurisdiction) would be openly visible to motorists travelling on I-8 and Old Highway 80, albeit these two turbines would be approximately five miles from I-8. Although scenic highway visual impacts to scenic highway motorists attributed to the 138 kV transmission line could be minimized to a level less than significant with the implementation the extent feasible with implementation of Mitigation Measures VIS-1a, VIS-1b, and VS-1c (see Section D.3.3.3), the visibility of wind turbines could not be further mitigated such that these project components would not grab the attention of passing motorists and generate strong visual contrast. Therefore, even with implementation of mitigation identified in Section D.3.3.3, impacts to scenic highways designated as such by the Draft General Plan Update Conservation and Open Space Element would not be significant and components under the County's jurisdiction would not be consistent with this policy.</p> <p>Scenic vista impacts associated with Tule Wind Project components under the County's jurisdiction are summarized above in response to Goal COS-11 and are discussed in the Tule Wind Project VIS-1 impact analysis contained in Section D.3.3.3.</p> <p>Components of the Tule Wind Project under the County's jurisdiction would generally avoid regionally significant or recognized</p>

Table 6-2 (Continued)

Applicable Visual Resource Plan, Policy, or Regulation	Consistency Determination
	<p>landscapes and would not be located on prominent ridgelines. Although Pacific Wind Development Tule Wind LLC proposes to site turbines on a prominent ridgeline located in the northwestern corner of the project area, these turbines would be located on Ewiiapaayp Band of Kumeyaay Indian tribal lands and the County would not have jurisdiction regarding the protection of this ridgeline. In addition, project facilities would be located in a designated scenic highway corridor and, therefore, the development of project components under the land use jurisdiction of the County of San Diego would be consistent with this policy as it relates to the protection of natural features including prominent ridgelines, dominant landforms, reservoirs, and scenic landscapes.</p> <p>Because construction and operation of Tule Wind Project components would result in significant visual impacts to scenic highways designated as such by the Draft General Plan Update Conservation and Open Space Element, Tule Wind Project components under the County's jurisdiction would not be consistent with Policy COS-11.2.</p>
<p>Policy COS-11.3: Development Siting and Design. Require development within visually sensitive areas to minimize visual impacts and to preserve unique or special visual features, particularly in rural areas, through the following:</p> <ul style="list-style-type: none"> • Creative site planning • Integration of natural features into the project • Appropriate scale, materials, and design to complement the surrounding natural landscape • Minimal disturbance of topography • Clustering of development to preserve a balance of open space vistas, natural features, and community character • Creation of contiguous open-space networks. 	<p>Pacific Wind Development Tule Wind LLC would implement mitigation in order to minimize visual impacts (to the extent feasible) resulting from construction and operation of the Tule Wind Project. Although construction and operation of the project components located on County lands would result in strong visual contrasts, with implementation of mitigation visual impacts would be reduced to the extent feasible and, therefore, the development of project components under the County's jurisdiction would be consistent with this policy.</p>
<p>Policy COS-11.4: Collaboration with Agencies and Jurisdictions. Coordinate with adjacent federal and state agencies and local jurisdictions to protect scenic resources and corridors that extend beyond the County's land use authority but are important to the welfare of County residents.</p>	<p>Pacific Wind Development Tule Wind LLC has coordinated with the BLM and County of San Diego with regards to turbine site locations and additional project details. Mitigation would be implemented by Pacific Wind Development Tule Wind LLC to minimize the visual impacts anticipated to occur from construction and operation of the Tule Wind Project. The project would be located primarily on BLM land that has been made available (by the BLM) for wind energy development and on which major modification to the existing environment is permitted. Therefore, since scenic resources would be protected (to the extent practicable) through mitigation, the Tule Wind Project would be consistent with this policy.</p>
<p>Policy COS-11.5: Collaboration with Private and Public Agencies. Coordinate with the CPUC, power</p>	<p>Pacific Wind Development Tule Wind LLC has collaborated with the BLM, County of San Diego, California State Lands Commission,</p>

Table 6-2 (Continued)

Applicable Visual Resource Plan, Policy, or Regulation	Consistency Determination
companies, and other public agencies to avoid siting energy generation, transmission facilities, and other public improvements in locations that impact visually sensitive areas, whenever feasible. Require the design of public improvements within visually sensitive areas to blend into the landscape.	Ewiiapaayp Band of Kumeyaay Indians, the CPUC, and SDG&E regarding the location of the Tule Wind Project and potential connections to existing facilities. The visibility of project components under the County's jurisdiction and the project's impacts to visually sensitive area would be minimized to the extent feasible through the implementation of mitigation identified in Section D.3.3.3. While proposed wind turbines could not be effectively blended into the landscape due to size, color, and movement of blades, Pacific Wind Development Tule Wind LLC has collaborated with private and public agencies and, therefore, the Tule Wind Project would be consistent with this policy.
Policy COS-11.7: Underground Utilities. Require new development to place utilities underground and encourage undergrounding in existing development to maintain viewsheds, reduce hazards associated with hanging lines and utility poles, and to keep pace with current and future technologies.	As proposed, an approximate 2-3-mile segment of the Tule Wind Project's overhead transmission line would traverse County of San Diego jurisdictional land in the Boulevard area. Policy COS-11.7 pertains to utility lines that are generally defined as distribution lines (less than 34 kV), rather than high voltage transmission lines. Consequently, this policy does not pertain to the Tule Wind Project 138 kV transmission line and, therefore, Tule Wind Project components under the County's jurisdiction would be consistent with this policy.
Goal COS-12: Preservation of Ridgelines and Hillides. Ridgelines and steep hillsides that are preserved for their character and scenic value. Policy COS-12.2: Development Location on Ridges. Require development to preserve and enhance the physical features by being located down and away from ridgelines so that structures are not silhouetted against the sky.	Components of the Tule Wind Project under County land use jurisdiction would avoid regionally significant or recognized landscapes and not be located on prominent ridgelines. Although Pacific Wind Development proposes to site turbines on a prominent ridgeline located in the northwestern corner of the project area, these turbines would be located on Ewiiapaayp Band of Kumeyaay Indian tribal lands and the County would not have jurisdiction regarding the protection of this ridgeline. Due to scale and vertical form, nearly all of the proposed wind turbines on County jurisdictional lands would be silhouetted against the sky when viewed from surrounding County lands. However, since these project components would not be located on ridges, project components under County land use jurisdiction would be consistent with this policy. Project facilities under County land use jurisdiction would not be located on undeveloped ridgelines or on steep hillsides. Therefore, the project is consistent with this policy.
Goal COS-13: Dark Skies. Preserved dark skies that contribute to rural character are necessary for the local observatories.	Pacific Wind Development would implement a lighting mitigation plan (MM VIS-a) to ensure that light bulbs and reflectors installed at project facilities are not visible from public viewing areas; lighting does not cause reflected glare, and illumination of the project facilities, vicinity, and nighttime sky is minimized. To reduce potential night lighting impacts (to the extent feasible) attributed to wind turbine lighting, Pacific Wind Development would implement Mitigation Measure VIS 4b which would incorporate the Obstacle Collision Avoidance System (OCAS) on proposed wind turbines (see Section D.3 Visual Resources for additional information). The OCAS has been designated a Dark Sky Friendly Device by the International Dark Sky Association. Because FAA obstruction lighting is required by the federal

Table 6-2 (Continued)

Applicable Visual Resource Plan, Policy, or Regulation	Consistency Determination
	government and because mitigation would be implemented to ensure that exterior turbine lighting is restricted to aviation warning lights, components of the Tule Wind Project under County land use jurisdiction would be consistent with this goal.
<p>Policy COS-13.1: Restrict Light and Glare. Restrict outdoor light and glare from development projects in Semi-Rural and Rural Lands and designated rural communities to retain the quality of night skies by minimizing light pollution.</p> <p>Policy COS-13.2: Palomar and Mount Laguna Observatories. Minimize, to the maximum extent feasible, the impact of development on the dark skies surrounding Palomar and Mount Laguna observatories to maintain dark skies that are vital to these two world-class observatories by restricting exterior light sources within the impact areas of the observatories.</p> <p>Policy COS-13.3: Collaboration to Retain Night Skies. <u>Coordinate with adjacent federal and State agencies, local jurisdictions, and tribal governments to retain the quality of night skies by minimizing light pollution.</u></p>	<p>Pacific Wind Development would implement a lighting mitigation plan (MM VIS-a) to ensure that light bulbs and reflectors installed at project facilities are not visible from public viewing areas; lighting does not cause reflected glare, and illumination of the project facilities, vicinity, and nighttime sky is minimized. In addition, nighttime lighting impacts would be minimized to the extent feasible through incorporation of the OCAS on proposed wind turbines (see Mitigation measure VIS-4b). Therefore, with implementation of mitigation, light and glare would be restricted, nighttime lighting impacts would be minimized to the extent feasible, and components of the Tule Wind Project under the County's jurisdiction would be consistent with these policies.</p> <p><u>Outdoor lighting will be restricted to the FAA lighting required on turbines, and lighting at the O&M Building. Turbines will be equipped with obstruction lighting that would operate during the nighttime.</u></p> <p><u>The O&M Building/Substation will adhere to the County standard regarding lighting. The O&M/Substation would be classified under the Class II, Parking Lots and Security classification, Zone A (within 15 miles of Laguna or Palomar Observatory) to utilize fully shielded low pressure sodium lamp types not to exceed 4050 lumens output.</u></p> <p><u>Zoning ordinance 6324 would limit illumination of outdoor public recreational facilities, unless a specific recreational activity requiring the lighting is already in progress. Security lights are excepted.</u></p> <p><u>The proposed project will not impact Palomar and Mount Laguna Observatories; nor would the project impact the dark skies of the area. The Tule Wind Project will comply with the County of San Diego dark sky ordinance (APM TULE-AES-7) for lighting at the substation and O&M Building, and due to topography and elevation, the FAA lighting would not be considered a significant impact, given these are federal requirements. Therefore, the project is consistent with these policies.</u></p>

Table 6-2 (Continued)

Applicable Visual Resource Plan, Policy, or Regulation	Consistency Determination
<i>County of San Diego Draft General Plan Update - Boulevard Subregional Planning Area Community Plan</i>	
<p>Goal 3.1: Protection as a Dark Sky Community through preservation of the dark skies in Boulevard to support the continued operation of the San Diego Astronomy Association and Tierra Del Sol Observatories and to continue to attract stargazers, photographers, scientists, and researchers from around the world.</p>	<p>Pacific Wind Development would implement a lighting mitigation plan (MM VIS-a) to ensure that light bulbs and reflectors installed at project facilities are not visible from public viewing areas; lighting does not cause reflected glare, and illumination of the project facilities, vicinity, and nighttime sky is minimized. To reduce potential night lighting impacts (to the extent feasible) attributed to wind turbines lighting, Pacific Wind Development would implement Mitigation Measure VIS-4b which would incorporate the Obstacle Collision Avoidance System (OCAS) on proposed wind turbines (see Section D.3 Visual Resources for additional information). The OCAS has been designated a Dark Sky Friendly Device by the International Dark Sky Association. Because FAA obstruction lighting is required by the federal government and because mitigation would be implemented to ensure that exterior turbine lighting is restricted to aviation warning lights, components of the Tule Wind Project under County land use jurisdiction would be consistent with this policy.</p>
<p>Policy LU 3.1.1: Encourage development to preserve dark skies with reduced lighting and increased shielding requirements.</p> <p>Policy LU 3.1.2: Encourage increased resources or methods for enforcement for the preservation of dark skies.</p>	<p>Pacific Wind Development Tule Wind LLC would implement a lighting mitigation plan (MM VIS-4a) to ensure that light bulbs and reflectors installed at project facilities are not visible from public viewing areas; lighting does not cause reflected glare, and illumination of the project facilities, vicinity, and nighttime sky is minimized. In addition, nighttime lighting impacts would be minimized to the extent permitted by federal regulations through the installation of the minimal amount of FAA required obstruction lighting, feasible through incorporation of the OCAS on proposed wind turbines (see Mitigation measure VIS-4b). Therefore, with implementation of mitigation, the Tule Wind Project would be consistent with these policies.</p>
<i>County of San Diego General Plan-Mountain Empire Subregional Plan</i>	
<p>Community Character (Policy and Recommendation 2): Development proposals within the Rural Village Boundaries Country Towns should avoid the removal of mature trees.</p>	<p>Pacific Wind Development Tule Wind LLC has not identified that the removal of mature trees or native oaks would be required during construction activities. In the event that ornamental trees would be removed by project design and grading, Pacific Wind Development Tule Wind LLC has proposed APM TULE AES-11 (superseded by Mitigation Measure VIS-3m), which would reduce visual contrast impacts to the community character of the Boulevard area by developing a tree removal and tree replacement plan (see Section D.3 Visual Resources for full text of mitigation measures). Therefore, with implementation of Mitigation Measure VIS-3m, the Tule Wind Project would be consistent with this policy.</p>
<p>Conservation (Environmental Resources) Goal: Ensure that there is careful management of environmental resources in the area to prevent wasteful exploitation or degradation of those resources and to maintain them for</p>	<p>Pacific Wind Development has proposed measures and would implement mitigation that would minimize (to the extent feasible) the visual contrasts resulting from construction and operation of project components on County lands. Although the visual changes</p>

East County Substation/Tule Wind/Energia Sierra Juarez Gen-Tie Projects
APPENDIX 6 – VISUAL RESOURCE CONSISTENCY TABLES

Table 6-2 (Continued)

Applicable Visual Resource Plan, Policy, or Regulation	Consistency Determination
future needs.	to the landscape were determined to be significant (see Section D.3 Visual Resources), Pacific Wind Development would operate the project for a period of approximately 30 years and at that time turbines could be removed and the existing visual setting could begin to return to the area. In addition, the Tule Wind Project would produce renewable energy and would reduce dependence on traditional energy sources. Therefore, components of the project under County land use jurisdiction would be consistent with this policy.
Conservation (Environmental Resources, Policy and Recommendation 46): The dark sky is a significant resource for the subregion, and appropriate steps shall be taken to maintain preserve it.	FAA-required aviation warning obstruction lighting associated with operation of proposed wind turbines under County land use jurisdiction would contribute nighttime lighting to the dark sky environment near the Boulevard community. <u>Nighttime sky impacts would be minimized to the extent permitted by federal regulations through the installation of the minimal amount of FAA required obstruction lighting. To further minimize dark sky impacts, Mitigation Measure VIS-4b would require Pacific Wind Development Tule Wind LLC would to incorporate OCAS on proposed wind turbines (see Section D.3 Visual Resources for additional information) however, at this time, the FAA has not approved OCAS to light wind turbine farms. As stated previously, the International Dark Sky Association has designated the OCAS a Dark Sky Friendly Device. In addition, Pacific Wind Development Tule Wind LLC would implement a lighting mitigation plan (MM VIS-4a) to ensure that light bulbs and reflectors installed at project facilities are not visible from public viewing areas; lighting does not cause reflected glare, and illumination of the project facilities, vicinity, and nighttime sky is minimized. Therefore, with implementation of mitigation, project components under the County's jurisdiction would be consistent with this policy.</u>
Scenic Highways Goal: Establish a network of scenic highway corridors within which scenic, historical, and recreational resources are protected and enhanced.	Although Old Highway 80 and I-8 are classified as eligible state scenic highways, neither has been officially designated. According to the existing County of San Diego General Plan I-8 is designated as a third priority scenic route from the El Cajon city limits to the Imperial County line. Project components under the County's jurisdiction would be openly visible to motorists along I-8 between the communities of Boulevard and Jacumba and due to the bulk and scale of proposed wind turbines, these components could not be better screened from the views of motorists. In addition, the 138 kV transmission line would be openly visible at the I-8 and McCain Valley Road crossing. Although mitigation has been provided which would minimize visual impacts associated with the 138 kV transmission line as viewed from I-8 (see Section D.3.3.3, Mitigation Measure VIS 1e), wind turbines would be large and attention grabbing. Therefore, even with implementation of mitigation provided in Section D.3.3.3, the construction and operation of proposed wind turbines under the County's jurisdiction would <u>not</u> be consistent with this goal.

Table 6-2 (Continued)

Applicable Visual Resource Plan, Policy, or Regulation	Consistency Determination
<u>Scenic Highway Policy and Recommendation 1: Mitigate the effects of development located within clear view of a designated scenic corridor.</u>	<u>Implementation of Mitigation Measure VIS-1a is intended to reduce impacts associated with the Tule Wind 138 kV transmission line at scenic highway crossings. With implementation of Mitigation Measure VIS-1a impacts to scenic corridors would be mitigated to the extent feasible and therefore, the Tule Wind Project would be consistent with this policy.</u>
Land Use, Goal , Policy and Recommendation 6): New industrial development should consider all views into the property from public streets, adjacent properties, and residences on nearby hills.	Tule Wind Project components, including wind turbines and the 138 kV transmission line and associated support structures, would be visible to County residents and motorists on I-8, Old Highway 80, and local roads within the communities of Boulevard and Jacumba. As discussed in Section D.3, multiple KOPs were selected to analyze the proposed Tule Wind Project from multiple viewing angles, viewer types, and viewing distances. Therefore, the Tule Wind Project would be consistent with this policy.
Land Use, Goal , Policy and Recommendation 135): Large, unbroken expanses of wall shall be avoided. If this is not possible, architectural details and/or landscaping shall be used to soften straight, unbroken facades.	Fencing is not proposed around project facilities located on County jurisdictional lands and, therefore, project components under County land use jurisdiction would be consistent with this policy.
County of San Diego Existing General Plan–Conservation Element	
<p>Astronomical Dark Sky Policy 1 (X-86): The County of San Diego will act to minimize the impact of development on the useful life of the observatories.</p> <p>Astronomical Dark Sky Policy 1 (X-86), Action Program Action Program 1.2): Amend appropriate ordinances to control sources of light that adversely affect Palomar and Mount Laguna Observatories.</p>	<p>Nighttime sky impacts would be minimized to the extent permitted by federal regulations through the installation of the minimal amount of FAA required obstruction lighting. To further minimize dark sky impacts, Mitigation Measure VIS-4b would require Tule Wind LLC to incorporate OCAS on proposed wind turbines (see Section D.3 Visual Resources for additional information) however, at this time, the FAA has not approved OCAS to light wind turbine farms. Nighttime lighting impacts associated with associated of wind turbines would be minimized through incorporation of the OCAS on proposed wind turbines. With the OCAS installed, turbine lighting would normally be off and would only be turned on when an approaching aircraft has a heading which could result in collision with a wind turbine. Therefore, unlike traditional wind turbine obstruction lighting, the OCAS would not generally illuminate the nighttime sky and would only be turned on as a safety precaution. Therefore, with implementation of Mitigation Measure VIS-4b (incorporate the OCAS on proposed wind turbines), nighttime lighting impacts would be minimized to the extent permitted by federal regulations and wind turbines under the County's jurisdiction would be consistent with these policies.</p>
County of San Diego Zoning Ordinance	
Section 6320 states that that all commercial and industrial operations shall be operated so as to not produce glare that is readily detectable (without instruments) by the average person at or beyond the lot line of the residential lot.	To reduce glare associated with wind turbines and the 138 kV transmission line, the project applicant would implement Mitigation Measures VIS-3j and VIS-3n. These measures include the use of dulled-metal-finish transmission structures and non-specular conductors (Mitigation Measure VIS-3j), and a Surface Treatment Plan for wind turbines and ancillary facilities (Mitigation Measure

Table 6-2 (Continued)

Applicable Visual Resource Plan, Policy, or Regulation	Consistency Determination
	VIS-3n). The implementation of these measures would reduce glare associated with the transmission line (and associated structures), and wind turbines and, therefore, the Tule Wind Project components on County jurisdictional lands would be consistent with this policy.
Section 6322 (Outdoor Lighting) controls unnecessary outdoor light emissions that produce unwanted illumination of adjacent properties by restricting outdoor lighting usage (required FAA lighting is not discussed).	Unnecessary lighting would be restricted through compliance with the requirements established in the Lighting Mitigation Plan (Mitigation Measure VIS-4a, see Section D.3.3.3). Obstruction lighting atop wind turbines is necessary and required by the FAA. Therefore, with implementation of mitigation, the Tule Wind Project would be consistent with this policy.
Section 6324 establishes lighting limitations including horizontal cutoff and light trespass. Regarding light trespass, the zoning ordinance states that “the illumination of adjacent premises by spill light shall not exceed a value of 0.2 foot candles measured in the horizontal or vertical plane at a point three feet above grade level and five feet inside the adjacent property.”	Although lighting at the collector substation and O&M facility would be effectively controlled through implementation of a Lighting Mitigation Plan, limitations could not be placed on FAA-required obstruction lighting (on wind turbines) that would limit the amount of lighting that would fall on nearby parcels. Even with incorporation of the OCAS (which has not been approved by the FAA at this time), spill light from obstruction lighting could exceed the 0.2 foot candle threshold identified in Section 6324. Therefore, the Tule Wind Project would not be consistent with this policy.
Section 6951 of the County Zoning Ordinance provides direction for the development of large wind turbine systems. According to the County Zoning Ordinance, large wind turbine systems shall be permitted on a parcel of at least 5 acres and considered a Major Impact Services and Utilities use type, requiring a Major Use Permit, approved in accordance with the Use Permit Procedure, commencing at Section 7350 of the Zoning Ordinance and the following requirements related to visual resources: f. Visual. The following measures should be followed whenever possible to minimize the visual impact of the project: -Removal of existing vegetation should be minimized. -Internal roads should be graded for minimal size and disruption. -Any accessory buildings should be painted or otherwise visually treated to blend with the surroundings. 4. The turbines and towers should be painted with non-reflective paint to blend with the surroundings.	Pacific Wind Development Tule Wind LLC has submitted an application with the County of San Diego for a Major Use Permit and has proposed mitigation and /would implement APMs similar in content and intent to those discussed in Section 7350 of the Zoning Ordinance (see Section D.3.3.3). Therefore, wind turbines under the County’s jurisdiction would be consistent with Section 6951.
County of San Diego Light Pollution Code (Dark Skies Ordinance)	
The Light Pollution Code designates all areas within a 15-mile radius of the Palomar and Mount Laguna observatories as Zone A, and all other areas of the County are designated Zone B. Zone A has more stringent lighting restrictions, including limits on decorative lighting, so that night skies are dark enough	The Tule Wind Project would be located primarily within Zone A as measured from the Mount Laguna Observatory. Lamp type and shielding requirements for Class II Lighting within the Zone A area state that lamps should be low-pressure sodium and fully shielded. Implementation of Mitigation Measure VIS-4a would ensure that exterior light fixtures are hooded and directed downward. Since the

Table 6-2 (Continued)

Applicable Visual Resource Plan, Policy, or Regulation	Consistency Determination
<p>for clear viewing through the telescopes at the observatories. The component of the Tule Wind Project proposing permanent lighting (collector substation, O&M facility, and wind turbines) would be located in Zone A.</p>	<p>collector substation and O&M facility would not be located on County jurisdictional lands, the County's Light Pollution Code would not be applicable to these facilities. However, implementation of Mitigation Measure VIS-4a (Lighting Mitigation Plan) would ensure consistency with the County Light Pollution Code and County Zoning Ordinance (Section 6322 and 6324) and would ensure that nighttime lighting at the collector substation and O&M facility would not conflict with the operation and research endeavors of local observatories.</p> <p>Section 59.109 (c) (Permanent Exemptions) of the Light Pollution Code states that federal and state facilities are exempt from the requirements of the County Light Pollution Code. While turbines would not be considered federal or state facilities, obstruction lighting atop wind turbines is required by the federal government (FAA) and the Light Pollution Code does not specifically discuss federally required lighting or lighting required on wind turbines. Night lighting impacts attributed to wind turbine lighting would be minimized to the extent <u>permitted by federal regulations through the installation of the minimal amount of FAA required obstruction lighting.</u> feasible through implementation of Mitigation Measure VIS-4b which would require Tule Wind LLC to require the incorporation of the Obstacle Collision Avoidance System on proposed wind turbines (see Section D.3 Visual Resources for full text of mitigation measure); however, the FAA has not approved OCAS to light wind turbine farms at this time. International Dark Sky Association has designated the OCAS as a Dark Sky Friendly Device. Therefore, because implementation of Mitigation Measures VIS-4a and VIS-4b and the proposed <u>obstruction lighting scheme</u> would minimize night lighting impacts to the extent feasible, project components under County land use jurisdiction would be consistent with this policy.</p>

Table 6-3
Consistency Analysis with Applicable Land Use Plans, Policies, or Regulations for the
Proposed ESJ Gen-Tie Project

Local Plans, Policies, or Regulations

Applicable Visual Resource Plan, Policy, or Regulation	Consistency Determination
County of San Diego Draft General Plan Update–Conservation and Open Space Element	
<p>Goal COS-11: Preservation of Scenic Resources. Preservation of scenic resources, including vistas of important natural and unique features, where visual impacts of development are minimized.</p>	<p>As discussed in Section D.3.3.3, the visual impacts associated with construction and operation of the ESJ Gen-Tie Project (either the 500 kV or 230 kV option) would be minimized through implementation of mitigation. Impacts to views from within the Table Mountain ACEC would be minimized by distance, back-screening resulting from the Sierra de Juarez Mountains, the presence of the existing SWPL transmission line and associated structures, and the proposed ECO Substation. Therefore, the ESJ Gen-Tie Project would be consistent with this policy.</p>
<p>Policy COS-11.1: Protection of Scenic Resources. Require the protection of scenic highways, corridors, regionally significant scenic vistas, and natural features, including prominent ridgelines, dominant landforms, reservoirs, and scenic landscapes.</p> <p>Policy COS-11.2: Scenic Resource Connections. Promote the connection of regionally significant natural features; designated historic landmarks; and points of regional historic, visual, and cultural interest via designated scenic corridors, such as scenic highways and regional trails.</p>	<p>While Old Highway 80 and I-8 are classified as eligible state scenic highways, neither has been officially designated. However, as discussed in Section D.3.3.3, the Draft General Plan Update Conservation and Open Space Element designates I-8 and Old Highway 80 in the project area as County designated scenic highways and the ESJ Gen-Tie would be openly visible to motorists travelling on I-8 and Old Highway 80. However, the 500 kV and 230 kV gen-tie line options would be back-screened by the Sierra de Juarez Mountains and the color of the support structures would not result in an overly strong visual contrasts. While the vertical form of support structures and linear gen-tie line would be highly noticeable and would further industrialize the project area, mitigation has been provided in Section D.3.3.3 that would minimize the visual contrasts of the ESJ Gen-Tie line. Therefore, with mitigation, the ESJ Gen-Tie Project would be consistent with these policies.</p>
<p>Policy COS-11.3: Development Siting and Design. Require development within visually sensitive areas to minimize visual impacts and to preserve unique or special visual features, particularly in rural areas, through the following:</p> <ul style="list-style-type: none"> • Creative site planning • Integration of natural features into the project • Appropriate scale, materials, and design to complement the surrounding natural landscape • Minimal disturbance of topography • Clustering of development to preserve a balance of open space vistas, natural features, and community character • Creation of contiguous open-space networks. 	<p>Energia Sierra Juarez U.S. Transmission, LLC. would implement mitigation measures in order to integrate the gen-tie and associated structures into the surrounding environment to the extent practicable. The scale and vertical form of gen-tie support structures would be consistent with existing industrial elements in the area (SWPL and associated steel lattice towers) and would be backscreened by the Sierra de Juarez Mountains from most viewing locations. Although the ESJ Gen-Tie Project would not compliment the surrounding natural environment, the siting of the project would be consistent with this policy.</p>
<p>Policy COS-11.4: Collaboration with Agencies and Jurisdictions. Coordinate with adjacent</p>	<p>Energia Sierra Juarez U.S. Transmission, LLC. has coordinated with the Department of Energy, CPUC, and the County of San Diego</p>

Table 6-3 (Continued)

Applicable Visual Resource Plan, Policy, or Regulation	Consistency Determination
<p>federal and state agencies and local jurisdictions to protect scenic resources and corridors that extend beyond the County’s land use authority but are important to the welfare of County residents.</p> <p>Policy COS-11.5: Collaboration with Private and Public Agencies. Coordinate with the CPUC, power companies, and other public agencies to avoid siting energy generation, transmission facilities, and other public improvements in locations that impact visually sensitive areas, whenever feasible. Require the design of public improvements within visually sensitive areas to blend into the landscape.</p>	<p>regarding the design and siting of the gen-tie line. Mitigation measures would be implemented to ensure that visual resources associated with construction and operation of the gen-tie would be minimized to the extent feasible and practicable. Therefore, with implementation of mitigation, the ESJ Gen-Tie Project would be consistent with this policy.</p>
<p>Policy COS-11.7: Underground Utilities. Require new development to place utilities underground and encourage “undergrounding” in existing development to maintain viewsheds, reduce hazards associated with hanging lines and utility poles, and to keep pace with current and future technologies.</p>	<p>The ESJ Gen-Tie Project would include an approximately 1-mile-long overhead gen-tie line and associated support structures. This policy pertains to utility lines that are generally defined as distribution lines (less than 34 kV) rather than gen-tie/transmission lines. Consequently, this policy does not pertain to the ESJ Gen-Tie Project.</p>
<p>Goal COS-12: Preservation of Ridgelines and Hillside. Ridgelines and steep hillsides are preserved for their character and scenic value.</p>	<p>The ESJ Gen-Tie Project would not be located on a ridgeline or steep hillside and would, therefore, not impact the character and scenic value of these natural features. Therefore, the ESJ Gen-Tie Project would be consistent with this policy.</p>
<p>Policy COS-12.2: Development Location on Ridges. Require development to preserve and enhance the physical features by being located down and away from ridgelines so that structures are not silhouetted against the sky.</p>	<p>The ESJ Gen-Tie Project would not be located on a ridgeline and off-site views of the project would be primarily back screened by the Sierra de Juarez Mountains. Therefore, the ESJ Gen-Tie Project would be consistent with this policy.</p>
<p>Goal COS-13: Dark Skies. Preserved dark skies that contribute to rural character are necessary for the local observatories.</p>	<p>No construction or permanent nighttime lighting (atop gen-tie line structures) is proposed by the project applicant; therefore, the ESJ Gen-Tie Project would be consistent with this policy.</p>
<p>Policy COS-13.1: Restrict Light and Glare. Restrict outdoor light and glare from development projects in Semi-Rural and Rural Lands and designated rural communities to retain the quality of night skies by minimizing light pollution.</p>	<p>Glare resulting from the development of the ESJ Gen-Tie Project would be minimized through implementation of Mitigation Measures VIS-3i, VIS-3j, and VIS-3l. No outdoor lighting would be installed atop the proposed gen-tie line structures. Therefore, with implementation of mitigation, resulting glare would be restricted and the ESJ Gen-Tie Project would be consistent with this policy.</p>
<p>Policy COS-13.2: Palomar and Mount Laguna Observatories. Minimize, to the maximum extent feasible, the impact of development on the dark skies surrounding Palomar and Mount Laguna observatories to maintain dark skies that are vital to these two world-class observatories by restricting exterior light sources within the impact areas of the observatories.</p>	<p>Since gen-tie structures would not include permanent nighttime lighting, dark skies and nighttime views around the project area would not be affected by gen-tie construction or operation. The ESJ Gen-Tie would be consistent with this policy.</p>

East County Substation/Tule Wind/Energia Sierra Juarez Gen-Tie Projects
APPENDIX 6 – VISUAL RESOURCE CONSISTENCY TABLE

Table 6-3 (Continued)

Applicable Visual Resource Plan, Policy, or Regulation	Consistency Determination
<p>Policy COS-13.3: Collaboration to Retain Night Skies. Coordinate with adjacent federal and State agencies, local jurisdictions, and tribal governments to retain the quality of night skies by minimizing light pollution.</p>	
County of San Diego General Plan–Mountain Empire Subregional Plan	
<p>Community Character (Policy ___ and Recommendation 2): Development proposals within the Rural Village Boundaries should avoid the removal of mature trees.</p>	<p>As proposed, the ESJ Gen-Tie Project would not include the removal of mature native oak trees. Therefore, the ESJ Gen-Tie Project would be consistent with this policy.</p>
<p>Conservation (Environmental Resources, Policy and Recommendation 4): The dark sky is a significant resource for the subregion and appropriate steps shall be taken to maintain it.</p>	<p>Lighting would not be installed atop proposed gen-tie structures. Therefore, the ESJ Gen-Tie Project would not impact the dark sky of the Mountain Empire subregion and would be consistent with this policy.</p>
<p>Scenic Highways Goal: Establish a network of scenic highway corridors within which scenic, historical, and recreational resources are protected and enhanced.</p>	<p>Although Old Highway 80 and I-8 are classified as eligible state scenic highways, neither has been officially designated. According to the existing County of San Diego General Plan I-8 is designated as a third priority scenic route from the El Cajon city limits to the Imperial County line. Viewed from I-8, the 500 kV and 230 kV gen-tie line options would be back-screened by the Sierra de Juarez Mountains and the color of the support structures would not result in an overly strong visual contrasts. While the vertical form of support structures and linear gen-tie line would be highly noticeable and would further industrialize the project area, mitigation has been provided in Section D.3.3.3 that would minimize the visual contrasts of the ESJ Gen-Tie line. Therefore, with mitigation, the ESJ Gen-Tie Project would be consistent with this goal.</p>
<p>Scenic Highway Policy and Recommendation 1: Mitigate the effects of development located within clear view of a designated scenic corridor.</p>	<p>As stated in Section D.3.3.3 when viewed from surrounding scenic areas and corridors, the visibility of the ESJ Gen-Tie 500 kV or 230 kV gen-tie and associated steel lattice structures/monopoles would be difficult given the intervening distance and backscreening the desert terrain and vegetation would provide. Therefore, because the visual impact would be minimal and less than significant, no mitigation would be required and the ESJ gen-Tie Project would be consistent with this policy.</p>
<p>Land Use, ___ (Industrial Goal, Policy and Recommendation 6): New industrial development should consider all views into the property from public streets, adjacent properties, and residences on nearby hills.</p>	<p>The ESJ Gen Tie Line would be visible from two residential mobile homes located within 0.45 mile of the project site and from mobile viewers on I-8 and Old Highway 80. As discussed in Section D.3, multiple KOPs were selected to analyze the proposed ECO Substation Project from multiple viewing angles, viewer types, and viewing distances. The visual contrasts resulting from operation of the gen-tie lines would be minimized due to distance and due to back-screening of the gen-tie by the Sierra de Juarez Mountain. Therefore, the ESJ Gen-Tie would be consistent with this policy.</p>
<p>Land Use, (Industrial Goal, Policy and Recommendation 135): Large, unbroken expanses of wall shall be avoided. If this is not</p>	<p>The ESJ Gen-Tie Project would not construct fencing around either the 500 kV or 230 kV gen-tie option. Therefore, the ESJ Gen-Tie Project would be consistent with this policy.</p>

Table 6-3 (Continued)

Applicable Visual Resource Plan, Policy, or Regulation	Consistency Determination
possible, architectural details and/or landscaping shall be used to soften straight, unbroken facades.	
County of San Diego Zoning Ordinance	
Section 6320 states that that all commercial and industrial operations shall be operated so as to not produce glare that is readily detectable (without instruments) by the average person at or beyond the lot line of the residential lot.	Pacific Wind Development Tule Wind LLC would implement mitigation (Mitigation Measures VIS-3j and VIS-3k) to reduce the potential for glare resulting from the gen-tie support structures. Because the use of dulled-metal-finish transmission structures and non-specular conductors would minimize glare resulting from gen-tie, the ESJ Gen-Tie Project would be consistent with this policy.

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