

November 28, 2022

Ramon Gonzalez
ZGlobal, Inc.
750 W. Main Street
El Centro, CA 92243

RE: Visual Impact Assessment Letter Report– Vega SES 2, LLC and Vega SES 3, LLC Projects

Dear Mr. Gonzalez:

The purpose of this Visual Impact Assessment (VIA) letter report is to evaluate the potential visual impacts associated with the construction and implementation of the Vega SES 2 and Vega SES 3 Solar Energy Storage Projects located in Imperial County, California. This VIA includes an analysis and description of the existing visual setting and potential visual impacts. If the Projects result in any adverse visual impacts, the purpose of the VIA is also to propose measures to minimize those impacts.

1.0 PROJECT DESCRIPTION, LOCATION, AND SETTING

The Projects are located in Imperial County between the unincorporated communities of Iris and Slab City, running parallel to the Coachella Canal. Figures 1 and 2 depict the Project location and vicinity (Attachment A).

Vega SES 2 is located on Imperial County Assessor's Parcel Numbers (APNs) 025-260-011 (approximately 288 acres), APN 025-270-023 (approximately 625 acres) and APN 025-010-006 (approximately 410 of the 640 acres). Vega SES 3 is located on the remainder of APN 025-010-006 (approximately 230 of the 640 acres). All Project parcels, for both Vega SES 2 and Vega SES 3, are designated as "Recreation/Open Space" in the Imperial County General Plan and are zoned S-2-RE (Open Space/Preservation with a Renewable Energy overlay).

Project Characteristics

Solar panels would use either thin film or crystalline solar photovoltaic (PV) technology modules mounted either on fixed frames or horizontal single-axis tracker (HSAT) systems. The fixed frame PV module arrays would be mounted on racks that would be supported by driven piles. The fixed-frame racks would be secured at a fixed tilt of 20 degrees to 30 degrees from horizontal facing a southerly direction. Current Project designs would have individual PV modules, mounted two high on a fixed frame, providing a two-foot ground clearance and resulting in the tops of the panels at approximately 7.5 feet above the ground. The fixed PV modules would be arranged in arrays spaced approximately 15 to 25 feet apart (pile-to-pile) to maximize performance and to allow access for panel cleaning (if necessary). These arrays would be separated from each other and the perimeter security fence by up to 30-foot wide interior roads. If HSAT technology is used, the PV modules would rotate around the north-south HSAT axis so that the PV modules would continue to face the sun as the sun moves across the sky throughout the day. The PV

modules would reach their maximum height (up to nine (9) feet above the ground, depending on the final design) at both sunrise and sunset, when the HSAT is rotated to point the modules at the rising or setting sun. At noon, or when stowed during high winds, when the HSAT system is rotated so that the PV modules are horizontal, the nominal height would be about six feet above the ground, depending on the final design. The individual PV systems would be arranged in large arrays by placing them in columns spaced approximately ten feet apart to maximize operational performance and to allow access for panel cleaning and maintenance. Current Project designs would have individual HSAT PV modules, each approximately two feet wide by four feet long (depending on the specific PV technology selected), mounted on a frame which is attached to an HSAT system. These HSAT arrays would be separated from each other and the perimeter security fence by up to 30-foot wide roads, consistent with County emergency access requirements.

VEGA SES 2

Two new substations would be constructed on the Vega SES 2 Project Site. The first substation would be constructed in the northwestern corner of APN 025-260-011 on approximately two acres. The substation would take the delivery of up to 60 kV electricity and increase the voltage of the electricity to 230 kV, where it would feed into the interconnection switching station for metering and delivery to the IID KN/KS Line. The substation would include two transformers, circuit breakers, disconnect switches, microwave or other communication facilities, and an electrical control building.

The second substation would be located in the northwestern corner of APN 025-270-023 on approximately two acres. This substation would be comprised of an underground combiner box used to connect all of the low voltage AC outputs of the inverters, a medium voltage transformer to increase the voltage up to 60 kV, a protective relay system and associated circuit breakers and disconnect switches. This substation would take delivery of the energy generated on APN 025-270-023 and transmit it through the proposed 34.5 kV or 60 kV lines to the primary Project substation on APN 025-260-011. The substation would include a transformer, circuit breaker, meters, disconnect switches, and microwave or other communication facilities.

One new interconnection switching station would be constructed on APN 025-260-011, immediately adjacent to the substation. The interconnection switching station and substation would be connected via a single overhead 230 kV line. The switching station would include circuit breakers, switches, overhead bus work, protective relay equipment and an electrical control building. The switching station would operate at 230 kV and be configured in a Breaker-And-A-Half arrangement. This would allow for looping in of one or two of the IID 230 kV lines as well as connection of the total Project output at 230 kV. The switching station would be enclosed within its own fence.

To connect the Project's interconnection facilities, the medium voltage power produced by the Project would be conveyed underground, or above ground where necessary, to cross over any sensitive site features. The design of the Project's interconnection facilities would meet all necessary utility standards and requirements. As required, surge arrestors would be used to protect facilities and auxiliary equipment from lightning strikes or other disturbances. Distribution from the site would be via an overhead connection.

The Vega SES 2 Project's distribution and interconnection consists of the medium voltage power being conveyed underground or aboveground via 34.5 kV or 60 kV distribution circuits from the substation located in the northwest corner of APN 025-270-023 to the substation located in the northwest corner of APN 025-260-011. The height of the proposed gen-tie transmission structures would be 40 feet. The electrical energy produced by the Vega SES 2 Project would be delivered to the IID through the Project's interconnection switching station to the IID's 230 kV KN/KS Line.

VEGA SES 3

A new substation would be constructed on the northwestern corner of the Vega SES 3 Project Site. The substation site will comprise approximately two acres. Medium voltage power electricity generated from the site would be conveyed underground, or above ground where necessary, to cross over any sensitive site features, to connect to the substation.

A new interconnection switching station would be constructed immediately adjacent to the substation. The interconnection switching station and substation would be connected via a single overhead 161 kV line. The switching station would include circuit breakers, switches, overhead bus work, protective relay equipment and an electrical control building. The switching station would operate at 161 kV and be configured in a Breaker-And-A-Half or three breaker ring bus arrangement. This would allow for looping in of the IID 161 kV "F" transmission line as well as connection of the Project gen-tie line. The switching station would be enclosed within its own fence. As shown in Figure 2-3, the electrical energy produced by the Vega SES 3 Project would be connected to the existing utility approved point of interconnection at the northeast corner of the site to the IID's 161 kV "F" Line.

Construction activities would primarily involve demolition and grubbing; grading of each Project site to establish access roads and pads for electrical equipment (inverters and step-up transformers); trenching for underground electrical collection lines; and the installation of solar equipment and security fencing. Stormwater management facilities would be constructed internally within the site and would consist of basins and infiltration areas. Dust generated during construction would be controlled by watering and, as necessary, the use of other dust suppression methods and materials accepted by the Imperial County Air Pollution Control District (ICAPCD) or the California Air Resources Board (CARB). A temporary, portable construction supply container would be located at the Project Sites at the beginning of construction and removed at the end of construction. Onsite parking would be provided for all construction workers.

Once construction is completed the Project would be remotely controlled. No employees would be based at the Project Sites. Primary security-related monitoring would be done remotely. Security personnel may conduct unscheduled security rounds and would be dispatched to the site in response to a fence breach or other alarm. Site maintenance workers may access the Project Site periodically to clean the panels and maintain the equipment and Project Area. The public would not have access to the facility. Access to the Project sites would be infrequent and limited to authorized personnel.

Conceptual plans for the Vega SES 2 and Vega SES 3 Projects are provided in Attachment B.

2.0 VISUAL IMPACT ASSESSMENT METHODOLOGY

The following steps were taken in analyzing the visual impacts of the proposed Vega SES 2 and Vega SES 3 Solar and Battery Storage Projects.

1. Describe the existing visual setting, including any sensitive viewer groups (i.e., baseline conditions);
2. Identify key viewpoints for visual assessment;
3. Describe or depict the visual appearance of the Projects at the key viewpoints. Key viewpoints are selected to represent the typical views from the public right-of-way;
4. Assess the visual changes that would be introduced by the Project and the viewer response based on defined attributes which are neither good nor bad. Change in visual character cannot be described as having good or bad attributes until compared with viewer responses to the change;
5. Determine the degree of visual impact;
6. Proposed methods to minimize adverse impacts

Evaluation of potential visual impacts resulting from implementation of the Proposed Project is based on the following criteria:

Change in Visual Quality. The difference in visual quality between the existing environmental setting and post-Project condition is considered visual quality change. Those changes are identified by studying site plans, which provide information on the various elements that will be removed from and incorporated into the current viewshed and the degree of change in the existing setting. The plans help to understand the potential changes in visual quality of the site after implementation of the Project. Physical changes are analyzed in relation to vividness, intactness, and unity of the Proposed Project conditions. Sensitivity of various viewer groups is evaluated to measure response to the visual quality changes.

Impacts to Visual Resources. Visual resources from both the natural and built environments can enhance the visual character and aesthetic quality of an area. The Project limits and vicinity were studied for visual resources. Visual resources can be associated with local events and history that represent and enhance the visual character of the local area. A project that substantially alters important visual resources can result in significant visual impacts. Mitigation is typically implemented to remove or minimize significant visual impacts.

Light, Glare, Shade, and Shadow. The existing light environment serves as a baseline to conduct light analysis and compare potential impacts caused by the introduction of the Proposed Project. Impacts relating to light, glare, shade, and shadow were examined during field observations and by the photographs to help establish light conditions during various times of the day and night and estimate the potential changes in the environment from Project implementation. New light sources and reduction or elimination of light could be considered impacts that could change the natural environmental setting of a Project Site. Impacts are evaluated based on how much existing conditions change, the degree of those changes, and the sensitivity of the affected environment.

Compatibility with Visual Policies. General Plans, Specific Plans, and other regulations or policies relating to visual resources and setting at the Project Site have been identified, reviewed, and used in the preparation of this analysis. Proposed visual changes that conflict with the adopted County guidelines could be considered a significant impact.

For the portion of the proposed alignment within BLM-managed lands, the Project Area was evaluated through the Visual Resource Inventory (VRI) process.

3.0 LOCAL VISUAL RESOURCE POLICIES

County of Imperial General Plan

Circulation and Scenic Highways Element

The Imperial County General Plan Circulation and Scenic Highways Element provides information about the transportation needs of the County and the various modes to meet these needs and provides for the movement of goods and people, including pedestrian, bicycles, transit, train, air and automobile. This Element is also intended to provide a plan to accommodate a pattern of concentrated and coordinated growth and to provide a means of protecting and enhancing scenic resources within both rural and urban scenic highway corridors.

The potential designation of Scenic Highway has been placed on specific roadways in the County and may be added to others in the future. This designation is intended to protect and enhance the County's scenic aesthetic resources which are visible from major County and State routes. As identified in the Circulation and Scenic Highways Element, four State routes within the County have the potential for designation as Scenic Highways:

- **Interstate 8 (I-8):** The initial segment for future Scenic Highway Designation status lies between the San Diego County line and its junction with State Route 98 (SR-98). This segment known as Mountain Springs Grade has a long, rapid elevation change, remarkable rock and boulder scenery, and plant life variations.
- **State Route 78 (SR-78):** The portion of SR-78 from the junction with State Route 86 (SR-86) to the San Diego County line is eligible for future Scenic Highway Designation. The area is considered scenic because of its desert characteristics and view of Salton Sea.
- **State Route 111 (SR-111):** SR-111 travels along the northeast shore of the Salton Sea and is eligible for future Scenic Highway Designation from Bombay Beach to the County line. The drive along this body of water is a study in primitive beauty and an interesting and startling anomaly. The contrast between the flat, wide Salton Sea with its sandy beach and the rugged rise of the Chocolate Mountains has many variations. The panoramic view of the opposite (southwest) shore and its backdrop of mountains is also a sight of pre-historic beauty.
- **Borrego-Salton Seaway:** County Highway S-22 is also known as the Borrego-Salton Seaway. It begins in Salton City and ends at the community of Borrego Springs in San Diego County. Along its route, is Clay Point, located a mile and half west of SR-86, which is a formation ring above a flat

desert shore which shows the bed of pre-Columbian Lake Cahuilla. Three and a half miles farther west, the Anza Verde Wash parallels the Borrego-Salton Seaway with uniquely scenic desert landforms and vegetation.

The Circulation and Scenic Highways Elements contains the following objectives for the preservation of environmental and scenic amenities of the area along potential Scenic Highways.

- Objective 4.1 Establish various systems of scenic recreational travel utilizing multiple transportation modes.
- Objective 4.2 Preserve, enhance, and protect Imperial County's scenic resources by the removal of illicit billboards from scenic areas and restrictions on new off-site sign construction visible from designated scenic highways.
- Objective 4.3 Protect areas of outstanding scenic beauty along any scenic highways and protect the aesthetics of those areas.
- Objective 4.4 Acquire scenic easements from private owners when required.
- Objective 4.5 Develop standards for aesthetically valuable sites. Design review may be required so that structures, facilities, and activities are properly merged with the surrounding environment.

Conservation and Open Space Element

The Imperial County General Plan Conservation and Open Space Element is a conservation guide for the protection of regional aesthetics. This Element identifies goals and policies to ensure the managed use of environmental resources to prevent limiting the range of resources available to future generations. The Conservation and Open Space Element identifies scenic visual resources within the County which include the deserts, sand dunes, mountains, and the Salton Sea.

Desert areas include the Yuha Desert, West Mesa, lower Borrego Valley, East Mesa, and Pilot Knob Mesa. Within the desert areas, there are unique geologic features which add scenic value to the natural landscape and desert vegetation which results in springtime blooms of desert flowers in the springtime. The Algodones Dunes are the largest sand dunes in California covering approximately 160 square miles and are a well-known landmark to County residents and highway travelers. These dunes are a significant visual resource due to their unique scenic qualities, historic features, and prominent visibility to a large number of viewers.

As described in this Element, scenic mountains within the County include the eastern foothills of the Peninsular Range along the County's southwest side consisting of the In-Ko-Pah or Jacumba Mountains, Coyote Mountains, and Fish Creek Mountains. East of this area is Mount Signal located along the international border on the eastern edge of the Yuha Desert, west of Calexico. The southeast foothills of the San Rosa-San Jacinto Mountain are a prominent feature from SR-86. The Superstition Mountains and Superstition Hills, located in West Mesa southeast of the lower Borrego Valley and west of Westmorland and Brawley, are visible from I-8 west of El Centro and from SR-86 between El Centro and the Salton Sea. In the northeastern part of the County, the Chocolate Mountains stretch northwest by southeast between Riverside County and the Colorado River. Portions of these mountain areas are designated by the Bureau

of Land Management (BLM) as Wilderness Areas, part of the National Wilderness Preservation System. The intention of this designation is to secure natural areas for the public purposes of recreation, scenic, scientific, educational, conservation, and historical use.

The Salton Sea is located in the northwestern portion of the County and encompasses approximately 376 square miles. This body of water has been sustained by agricultural drainage from the Imperial, Coachella, and Mexicali valleys, rainfall, storm runoff from surrounding mountains, and groundwater inflow. The Salton Sea provides migrating and winter habitat for waterfowl and other birds and is a unique visual resource because of its size, location in a desert environmental, and its value for wildlife.

Anza-Borrego Desert State Park, located on the eastern side of San Diego County with portions extending into Imperial Count, features washes, wildflowers, palm groves, cacti, sweeping vistas, and hiking trails.

The Conservation and Open Space Element also identifies scenic vista points which include the Osborne Overlook and Juan Bautista de Anza Overlook. The Osborne Overlook offers scenic views of the Imperial Sand Dunes Recreational Area, North Algodones Dunes Wilderness, and surrounding area while the Juan Bautista de Anza Overlook provides a view of the Yuha Basin and surrounding landscape.

The Conservation and Open Space Element contains the following objectives for the preservation of environmental and scenic amenities of the area along potential Scenic Highways (County of Imperial 2016).

Objective 5.1 Encourage the conservation and enhancement of the natural beauty of the desert and mountain landscape.

Objective 5.2 Utilize the Code Enforcement process to eliminate visually dilapidated buildings that impact the visual character of rural communities.

4.0 BASELINE VISUAL CONDITIONS

A view is defined by the topography, development, activity, and vegetation. The Project Areas were observed and mapped to identify existing visual resources in the area, key views, and viewer groups. Key locations along the Project perimeters were photodocumented during a visual field survey in January 2021 to record existing visual conditions in the Project Vicinity and surrounding area. Land uses and topography were assessed to characterize the physical environment and establish the existing visual setting as described below.

Topography

Topography consists of gentle slopes with a gradual increase in elevation from west to east and elevations range between -2 meters (-7 feet) and 55 meters (182 feet) above mean sea level. Adjacent land uses include active agriculture and the Coachella Canal. Bureau of Land Management (BLM) open space areas exist to the north, east, and south.

Land Use

Surrounding lands are designated as “Recreation/Open Space” by the Imperial County General Plan and are zoned S-2-RE (Open Space/Preservation with a Renewable Energy overlay). Pursuant to Section 91703.02 (CONDITIONAL USE PERMITS), Renewable Energy Projects must be located within the Renewable Energy Overlay Zone and may be permitted only through the issuance of a Conditional Use Permit (CUP) as approved by the Approving Authority unless otherwise allowed by applicable law.

Vegetation

The majority of the Project Sites consists of creosote bush scrub and palo verde/ironwood woodland. Other vegetation types present include bush seepweed scrub, disturbed creosote bush scrub, four-wing saltbush scrub, and tamarisk thickets. A small portion of the area adjacent to the proposed gen-tie alignment along Flowing Wells Road is active agriculture. The remainder of the Project Area consists of the canal and existing unpaved roadways (ECORP 2020).

Historic Resources

A records search for historic resources was conducted in November 2020 at the South Coastal Information Center (SCIC) at San Diego State University. The records search included a review of all recorded historic and prehistoric archaeological sites within a one-mile radius of the Project Area, as well as a review of known cultural resource surveys and excavation report. One previously recorded resource and 156 newly identified resources are located within the Project Area; however, none of the resources within the Project Area have been evaluated for significance pursuant to CEQA (ECORP 2021).

5.0 KEY VIEWS

Because it is not feasible to study every available view of the Project Sites, four key views that represent typical views with distinct visual characteristics in the Project study area were selected. The key views reflect views of the Project Site and were taken from locations within the public right-of-way. A description of the four key views is provided below and key view locations are depicted in Figure 3 (Attachment A).



Key View 1: Coachella Canal Road, North of Flowing Wells Road – Vega SES 2 and 3

Key View 1 is a view from Coachella Canal Road, north of Flowing Wells Road facing east. The dominant feature within this key view is the vegetation visible throughout the view. Also visible within this view is the Coachella Canal berm in the middleground and the distant Chocolate Mountains in the background. This view does not exhibit any striking or distinctive visual patterns; however, the presence of the scenic mountains in the background provide an aesthetic resource, although somewhat obstructed, to the view.

While the Coachella Canal is present and the berm along the edge of the canal is visible within this key view, it is free from encroaching man-made elements.



Key View 2: Niland-Pegleg Well Road, East of Coachella Canal – Vega SES 2 and 3

Key View 2 is a view from Niland-Pegleg Well Road, east of Coachella Canal facing east. Similar to Key View 1, the dominant features within this key view are the vegetation visible throughout the view and the Chocolate Mountains in the background. Also visible within this view is the Coachella Canal berm in the foreground. This does not exhibit any striking or distinctive visual patterns; however, the presence of the scenic mountains in the background provide aesthetic resources that are prominent and mostly unobstructed in the view.

While a service road and the Coachella Canal berm along the edge of the canal is visible within this key view, it is mostly free from encroaching man-made elements.



Key View 3: Coachella Canal Road, North of Niland-Pegleg Well Road – Vega SES 2 3

Key View 3 is a view from Coachella Canal Road, north of Niland-Pegleg Road facing north. The dominant features within this key view is Coachella Canal Road, the vegetation visible on either side of the road, and the Chocolate Mountains in the distant background. Also visible within this view are apiary boxes on the east side of Coachella Canal Road. This view does not exhibit any striking or distinctive visual patterns. The presence of the scenic mountains in the distant background are visible but are affected by atmospheric conditions (e.g., haze). However, the mountains do provide aesthetic resources that are somewhat obstructed in the view.

Due to the presence of the roadway and apiary boxes within this key view, the view contains highly visible encroaching man-made elements.



Key View 4: Noffsinger Road– Vega SES 2

Key View 4 is a view from Noffsinger Road facing north. The dominant features within this key view are the existing Union Pacific Yuma subdivision railroad track, sparse vegetation in the foreground with denser vegetation beyond the railroad track, and the Chocolate Mountains in the background. Also visible within this view are marker posts associated with an underground utility line. This view does not exhibit any striking or distinctive visual patterns; however, the presence of the scenic mountains in the background, although affected by atmospheric conditions (e.g., haze), provide aesthetic resources that are mostly unobstructed in the view.

Due to the presence of the railroad track and marker posts visible within this key view, the view contains highly visible encroaching man-made elements.

6.0 VISUAL CHANGE AND VISUAL IMPACT EVALUATION

Evaluation of potential visual impacts resulting from implementation of the proposed Vega SES 2 and Vega SES 3 Project is based on the following criteria:

- **Change in Visual Quality.** The difference in visual quality between the existing environmental setting and post-Project condition is considered visual quality change. Those changes are identified by

studying engineering plans, which provide information on the various elements that will be replaced and/or reconstruction into the current viewshed and the degree of change in the existing setting.

- **Impacts to Visual Resources.** Visual resources from both the natural and built environments can enhance the visual character and aesthetic quality of an area. The Project limits and vicinity were studied for visual resources. Visual resources can be associated with local events and history that represent and enhance the visual character of the local area. A project that substantially alters important visual resources can result in adverse visual impacts. Mitigation is typically implemented to remove or minimize adverse visual impacts.
- **Light, Glare, Shade, and Shadow.** The existing light environment serves as a baseline to conduct light analysis and compare potential impacts caused by introduction of one of the alternatives. Impacts relating to light, glare, shade, and shadow were examined during field observations and by the photographs to help establish light conditions during various times of the day and night and estimate the potential changes in the environment from Project implementation. New light sources and reduction or elimination of light could be considered impacts that could change the natural environmental setting of a Project Site. Impacts are evaluated based on how much the existing conditions change, the degree of those changes, and the sensitivity of the affected environment.
- **Compatibility with Visual Policies.** General Plans, Specific Plans, and other regulations or policies relating to visual resources and setting at the Project Site have been identified, reviewed, and used in preparation of this assessment. Proposed visual changes that conflict with the adopted agency guidelines could be considered an adverse impact.

Impacts at Key View 1

From Key View 1, the overall character and experience for the viewer would change substantially with implementation of the Project. The main physical change that would occur within this view is the complete removal of vegetation and grading of the Project Site to accommodate the construction of solar apparatus and security fencing. Other facilities proposed such as roads, pads, underground utilities, and stormwater facilities would not be visible from the public right-of-way. The County has identified the Chocolate Mountains as a scenic resource; however, no scenic vista points are identified in the County General Plan and none of the roadways in the Project vicinity are designated scenic highways or roadways. Additional visual changes within this key view would be the installation of poles and electrical lines associated with the gen-tie line if the alignment option along Flowing Wells Road is constructed.

The proposed PV module frames when installed on pads would be approximately 7.5 feet in height and the proposed security fencing would be approximately 6 feet in height. Currently, the existing vegetation on the Project Site ranges from short shrubs to large bushes and views of the Chocolate Mountains in the background are already partially obstructed by the existing Coachella Canal berm and large bushes. The installation of the new PV module frames would also result in the obstruction of the Chocolate Mountains as they are similar in height to existing large bushes on the site. PV module frames would be arranged in arrays spaced approximately 15 to 25 feet apart to maximize performance and allow access for maintenance and cleaning. As a result of the spacing of the arrays, view corridors of the Chocolate

Mountains would be maintained throughout the site as a viewer travels along Coachella Canal Road. The construction of gen-tie poles and electrical lines would introduce manmade elements into the view; however, the profile of these structures and lines are slim and would not substantially obstruct existing views of the mountains.

Implementation of the Proposed Project would change the natural conditions of the site to a solar energy generation and battery storage facility. Onsite vegetation would be completely removed, and the site would be graded to accommodate the installation of the PV module frames in arrays. The Imperial County General Plan has designated the Project Sites as "Recreation/Open Space" and are zoned S-2-RE (Open Space/Preservation with a Renewable Energy Overlay). Renewable energy projects must be located within the Renewable Energy Overlay Zone and may be permitted only through the issuance of a Conditional Use Permit (CUP). With a CUP, the Project would be consistent with the intended use of the land. Although Project implementation would result in the conversion of a naturally vegetated area with energy-related facilities, open space vegetated areas are not considered to be scenic resources by the County of Imperial.

Impacts at Key View 2

Similar to Key View 1, the overall character and experience for the viewer would change substantially at Key View 2 with implementation of the Project. The main physical change that would occur within this view is the complete removal of vegetation and grading of the Project Site to accommodate the construction of solar equipment and security fencing. Additional visual changes within this key view would be the installation of poles and electrical lines associated with the gen-tie line if the alignment option along Niland-Pegleg Well is constructed.

As previously identified, proposed onsite apparatus would be approximately 7.5 feet in height and the proposed security fencing would be approximately 6 feet in height. The installation of the new PV module frames would also result in the obstruction of the Chocolate Mountains as they are similar in height to existing large bushes on the site; however, from this key view vantage point, the Chocolate Mountains in the background are relatively unobstructed. PV module frames would be arranged in arrays spaced approximately 15 to 25 feet apart and as a result of the spacing of the arrays, view corridors of the Chocolate Mountains would be maintained throughout the site as a viewer travels along Coachella Canal Road. The construction of gen-tie poles and electrical lines would introduce manmade elements into the view; however, the profile of these structures and lines are slim and would not substantially obstruct existing views of the mountains.

Onsite vegetation would be completely removed, and the site would be graded to accommodate the installation of the PV module frames in arrays. Although Project implementation would result in the conversion of a naturally vegetated area with energy-related facilities, open space vegetated areas are not considered to be scenic resources by the County of Imperial.

Impacts at Key View 3

From Key View 3, the overall character and experience for the viewer would change moderately with implementation of the Project. The main physical change that would occur within this view is the complete removal of vegetation and grading of the Project Site on the east side (right side) of Coachella Canal Road to accommodate the construction of solar apparatus and security fencing. There would be no change on the west side of the roadway (left side). Additional visual changes within this key view would be the installation of poles and electrical lines associated with the gen-tie line if the alignment option along the Coachella Canal is constructed.

As previously identified, proposed onsite apparatus would be approximately 7.5 feet in height and the proposed security fencing would be approximately 6 feet in height. The installation of the new PV module frames would also result in the obstruction of the Chocolate Mountains as they are similar in height to existing large bushes on the site. However, views of the Chocolate Mountains from Coachella Canal Road and the viewshed to the west of the road would be maintained as no Project-related facilities would be constructed that would obstruct views in those areas. The construction of gen-tie poles and electrical lines would introduce manmade elements into the view; however, the profile of these structures and lines are slim and would not substantially obstruct existing views of the mountains.

Onsite vegetation would be completely removed, and the site would be graded to accommodate the installation of the PV module frames in arrays. Although Project implementation would result in the conversion of a naturally vegetated area with energy-related facilities, open space vegetated areas are not considered to be scenic resources by the County of Imperial.

Impacts at Key View 4

From Key View 4, the overall character and experience for the viewer would change slightly with implementation of the Project. The main physical change that would occur within this view is the complete removal of vegetation and grading of the Project Site which is beyond the railroad tracks to accommodate the construction of solar apparatus and security fencing.

The installation of the new PV module frames would not result in the obstruction of the Chocolate Mountains and would align with the existing horizon due to the distance away from the Key View 4 vantage point. Therefore, the views of the Chocolate Mountains would be maintained throughout the site as a viewer travels along Noffsinger Road.

Implementation of the Proposed Project would change the natural conditions of the site to a solar energy generation and battery storage facility. Onsite vegetation would be completely removed, and the site would be graded to accommodate the installation of the PV module frames in arrays. The area in the foreground in front of the railroad tracks would not change from the existing condition. Although Project implementation would result in the conversion of a naturally vegetated area with energy-related facilities, open space vegetated areas are not considered to be scenic resources by the County of Imperial.

Construction Impacts

Construction of the proposed Project would result in temporary visual changes due to construction activities. Potential short-term construction impacts would result from the Proposed Project through the presence of construction equipment and materials. Upon completion of construction, equipment and construction materials would no longer be present.

Light, Glare, Shade, and Shadow

Minimal lighting would be required for operations and would be limited to safety and security functions. All lighting will be directed downward and shielded to focus illumination on the desired areas only and to minimize light trespass in accordance with applicable County requirements. If additional lighting should be required for nighttime maintenance, portable lighting equipment would be used. The Project is not anticipated to create a new source of substantial light which would adversely affect nighttime views in the Project Area.

The Projects would involve the installation of PV solar arrays which have low reflectivity. Solar PV modules are specifically designed to reduce reflection as any reflected light cannot be converted into energy. Research has shown that reflectivity from PV panels are similar to reflections from water (National Renewable Energy Laboratory 2020). Therefore, the PV panels would not create a significant source of glare during sunlight hours. The Project would not use other reflective materials such as fiberglass, aluminum or vinyl/plastic siding, galvanized products, and brightly painted steel roofs that have the potential to create on- and off-site glare.

Shade and shadow effects would be introduced within the Project Sites due to the placement of PV modules in arrays. However, due to the height of the proposed apparatus at 7.5 feet and the perimeter fencing at 6 feet, the effects of shade and shadow would not encroach into areas offsite for extended periods of time that would result in significant shade and/or shadow impacts.

Scenic Highways

There are no designated Caltrans scenic highways in the vicinity of the Proposed Project. None of the scenic highways identified in the County's General Plan Circulation and Scenic Highways Element are located in the Project vicinity. There would be no impact to scenic resources within a State or locally designated scenic highway.

Historic Resources

As previously identified, the one previously recorded resource and 156 newly identified resources located within the Project Area have not been evaluated for significance. If these resources are determined to be eligible per the eligibility criteria for inclusion in the California Register of Historical Resources and avoidance is not feasible, mitigation would be required that could consist of either avoidance by preserving them in dedicated open space, by requiring archaeological monitoring, or by carrying out data recovery efforts prior to Project approval, implementation, or construction. As none of the cultural

resources identified within the Project Site are visible from public vantage points, there would be no visual impact to historic resources.

Visual Resource Policies

Scenic features, vistas, or landforms identified by the County of Imperial would not be significantly affected by construction and implementation of the Project. While portions of the Chocolate Mountains in the background would be partially obstructed by the PV arrays, current views of the mountains are already partially obstructed by existing tall vegetation in the existing condition. Further, the arrangement of the PV modules in arrays spaced between 15 and 25 feet apart would result in the establishment of view corridors of the mountains from the public right-of-way. The proposed Project would not conflict with specific policies identified in the Circulation and Scenic Highways Element or Open Space and Conservation Element of the County's General Plan. No impacts associated with incompatibility with visual resource policies would occur under the proposed Project.

Summary of Impacts

During the construction phase, the presence of construction equipment and materials would not have a permanent, long-term impact on the visual environment. Upon completion of the Project, areas that were cleared for construction staging would be converted to a new energy generating and storage facilities or returned to their existing condition.

No substantial obstruction of existing scenic resources would occur with Project implementation. Existing views of the Chocolate Mountains are already partially obstructed by large bushes. Solar PV arrays would be spaced approximately 15 to 25 feet apart allowing for views of the Chocolate Mountains within those spaces. The construction of gen-tie poles and electrical lines would introduce manmade elements into views at KV 1, 2, and 3; however, the profile of these structures and lines are slim and would not substantially obstruct existing views of the mountains.

Minimal lighting would be required for operations and would be limited to safety and security functions and would adhere to County lighting requirements. The Project is not anticipated to create a new source of substantial light which would adversely affect nighttime views in the Project Area. Shade and shadow effects would not be a significant impact to adjacent properties due to the height of the proposed apparatus and security fencing.

Potential impacts to California Register of Historical Resources-eligible historic resources would need to be avoided by preserving them in dedicated open space, by requiring archaeological monitoring, or by carrying out data recovery efforts prior to Project approval, implementation, or construction.

The Project would be consistent with the County General Plan. No impacts associated with incompatibility with visual resource policies would occur under the Proposed Projects.

Sincerely,

A handwritten signature in blue ink, appearing to read "David Allen".

Senior Environmental Planner
ECORP Consulting, Inc.

Attachments

Attachment A: Figures

Attachment B: Conceptual Plans



REFERENCES

County of Imperial. 2008. *County of Imperial General Plan Circulation and Scenic Highways Element*. January

_____. 2016. *County of Imperial General Plan Circulation and Scenic Highways Element*. March.

_____. 2016. *County of Imperial General Plan Conservation and Open Space Element*. March.

ECORP. 2020. *Biological Technical Report Vega SES 2 and 3 Solar Projects*. December

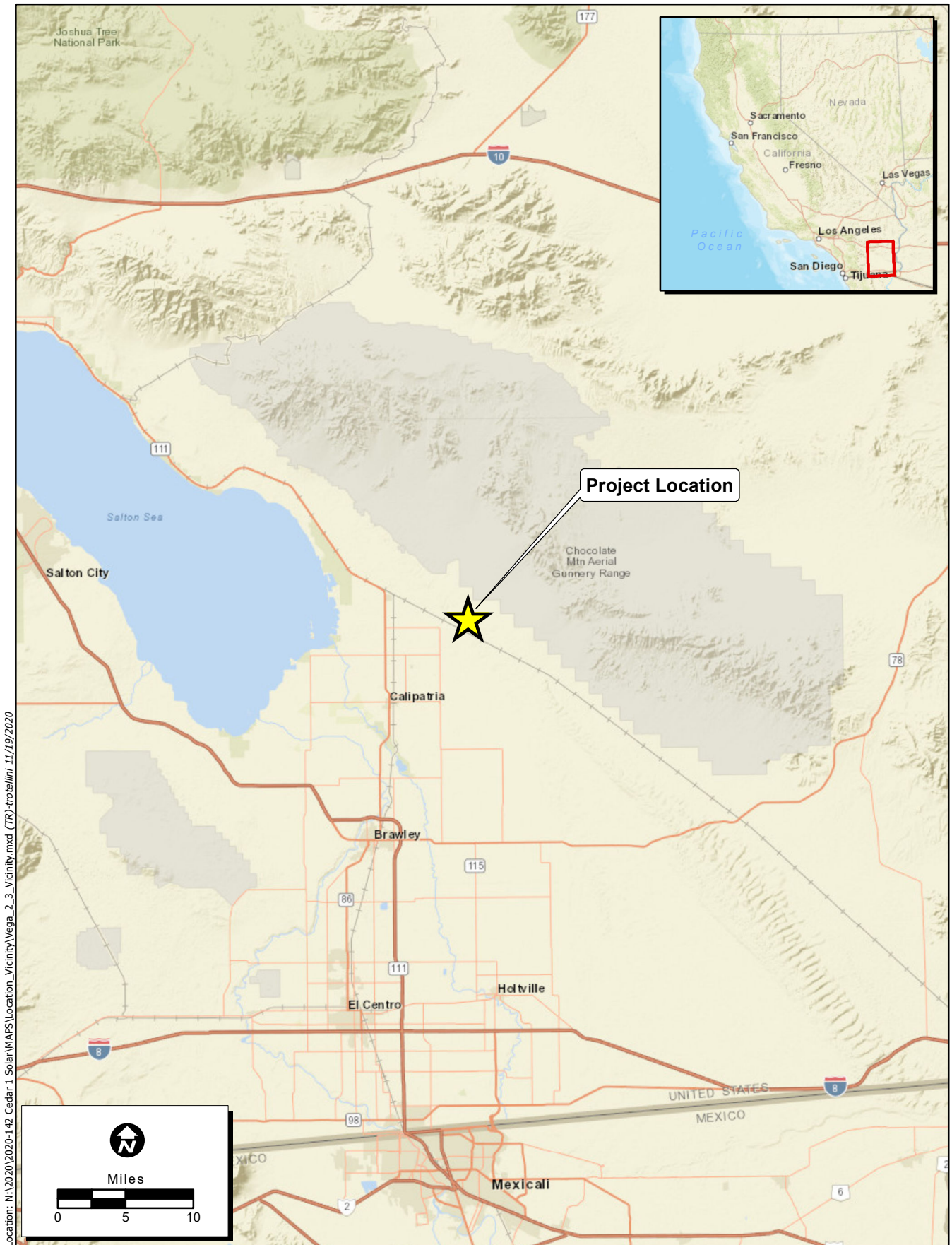
_____. 2021. *Cultural Resources Inventory Vega SES 2, 3, and 2B Solar Energy Project*. March

National Renewable Energy Laboratory. 2020. *Research and Analysis Demonstrate the Lack of Impacts of Glare from Photovoltaic Modules*. Website: <https://www.nrel.gov/state-local-tribal/blog/posts/research-and-analysis-demonstrate-the-lack-of-impacts-of-glare-from-photovoltaic-modules.html>, Accessed March 25, 2021.

LIST OF ATTACHMENTS

Attachment A – Figures

Attachment B – Conceptual Plans



Location: N:\2020\2020-142 Cedar 1 Solar\WAPS\Location_Vicinity\Vega_2_3_Vicinity.mxd (TR) created 11/19/2020

Map Date: 11/18/2020
Sources:

Figure 1. Project Vicinity

2020-144/2020-199/2020-209 Vega SES 2 and Vega SES 3

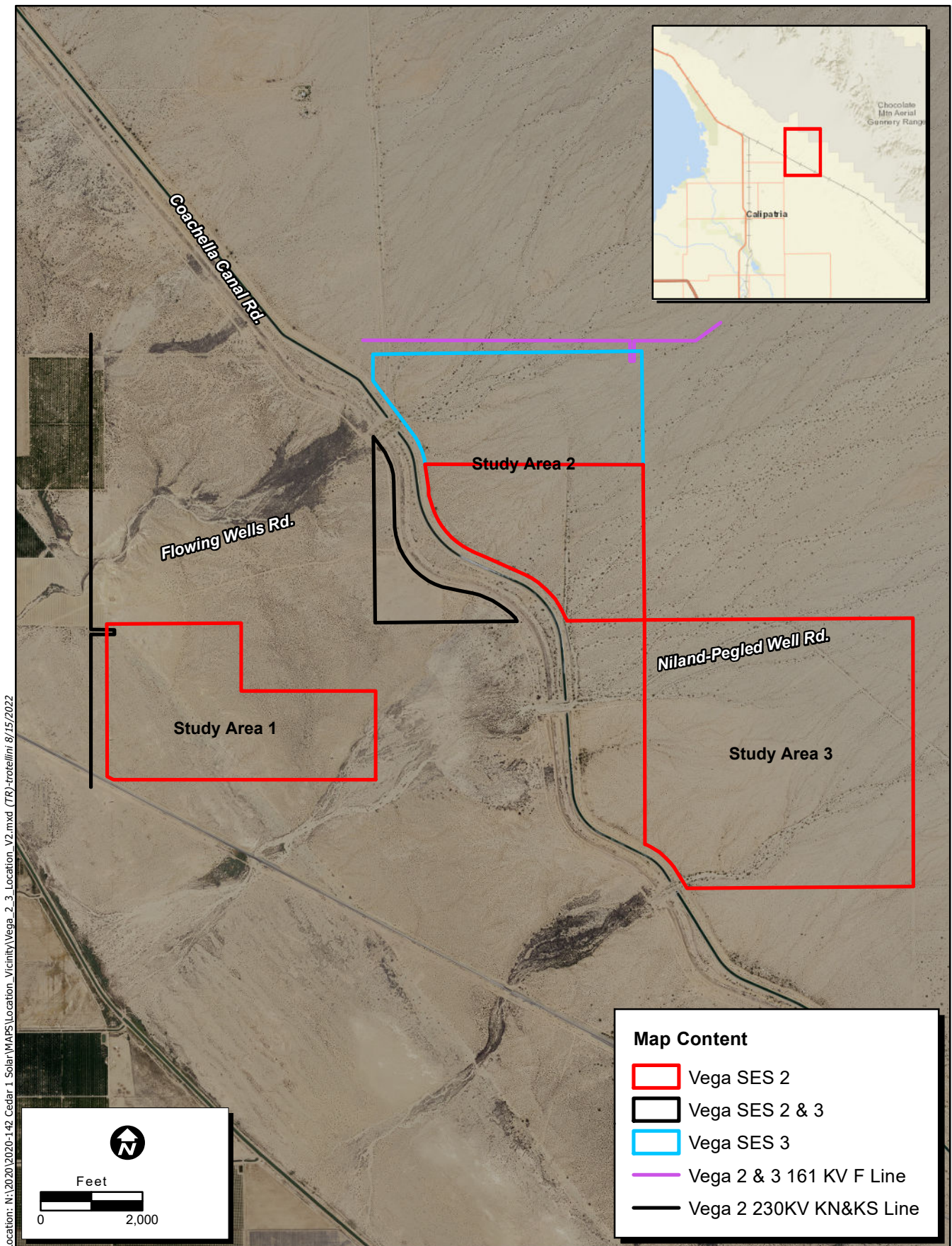


Figure 2. Project Location

2020-144/2020-199/2020-209 Vega SES 2 and Vega SES 3

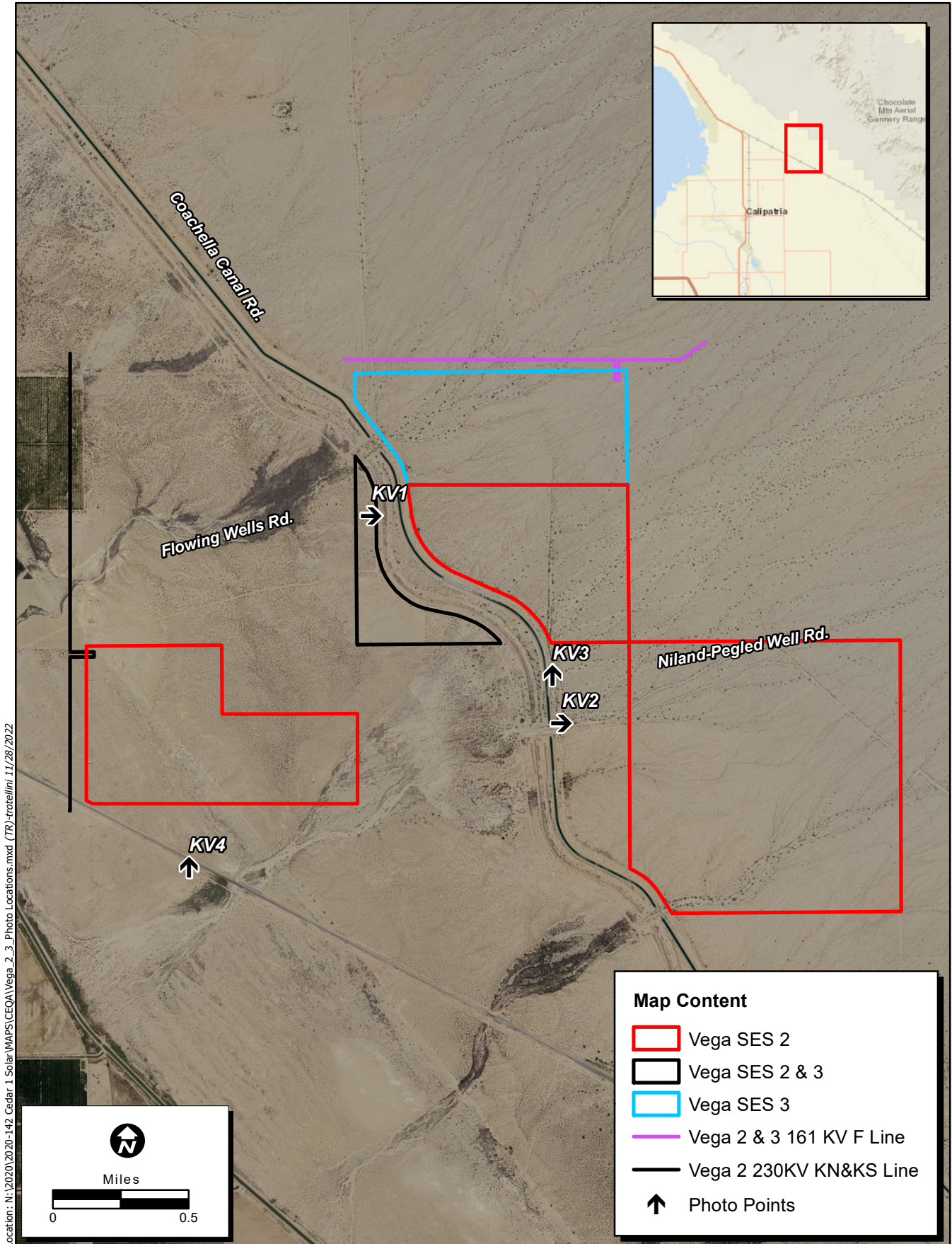


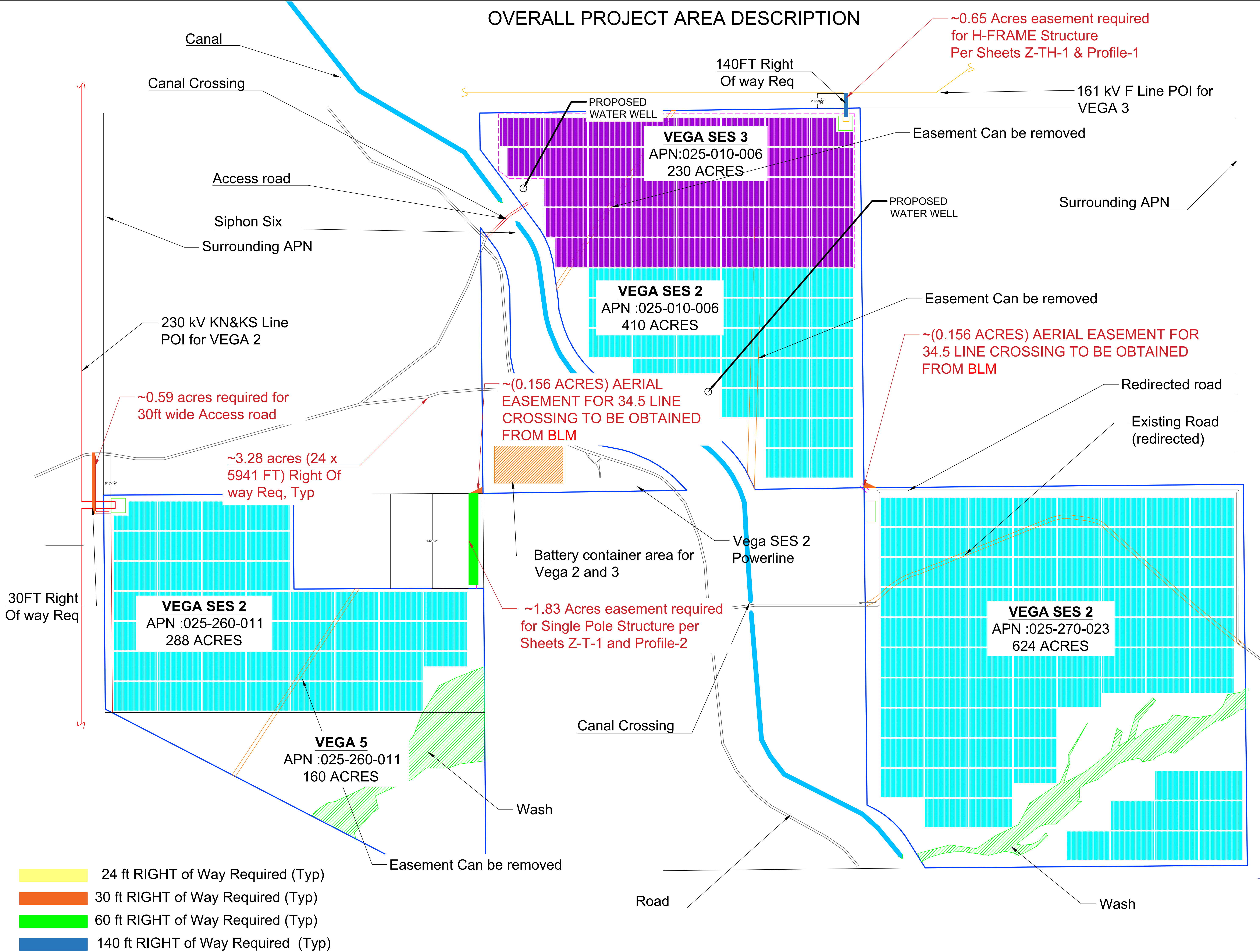
Figure 3. Photo Locations

2020-144/2020-199/2020-209 Vega SES 2 and Vega SES 3

ATTACHMENT B

Conceptual Plans

OVERALL PROJECT AREA DESCRIPTION



VEGA SES 2-3

CONFIDENTIAL DOCUMENTS
THE INFORMATION EMBODIED ON THIS DRAWING IS STRICTLY CONFIDENTIAL AND IS SUPPLIED WITH THE UNDERSTANDING THAT IT WILL BE HELD CONFIDENTIAL AND NOT DISCLOSED TO THIRD PARTIES WITHOUT THE PRIOR WRITTEN CONSENT OF ZGLOBAL, INC.

REV.	BY	DESCRIPTION	DATE	APPRD BY
0	RO	PRE-SUBMITTAL	09/02/21	HP
1	RO	PRE-SUBMITTAL	09/13/21	HP
2	RO	PRE-SUBMITTAL	02/08/22	HP
3	HP	PRE-SUBMITTAL	10/25/22	HP

DRAFT

ApexEnergy
SOLUTIONS

604 SUTTER ST, STE 250
FOLSOM, CA 95630
Phone : 916.985.9461
Fax: 916.985.9467

"THESE DRAWINGS AND SPECIFICATIONS HAVE BEEN PREPARED BY ZGLOBAL INC. FOR THEIR EXCLUSIVE USE IN ACCORD WITH SEC. 6737.3 OF THE 2012 PROFESSIONAL ENGINEERS ACT OF THE STATE OF CALIFORNIA"

SHEET TITLE:

SITE PLAN 2

DRAWN BY:	RO	DRAWING No.
CHECKED:	HP	
SCALE:	N.T.S	C-000
JOB NO:		
DATE:	1	REV No.
		1