

November 28, 2022

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

RE: Visual Impact Assessment Letter Report - Vega SES 5 Project

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 5 Solar Energy Storage Project located in Imperial County, California. This VIA includes an analysis and description of the existing visual setting and potential visual impacts. If the Project results 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 Project is located in Imperial County between the unincorporated communities of Iris and Slab City, and south of the Union Pacific Yuma subdivision railroad track. Figures 1 and 2 depict the Project location and vicinity (Attachment A).

Vega SES 5 is located on Imperial County Assessor's Parcel Numbers (APNs) 025-260-011 (approximately 160 acres), 025-260-019 (approximately 90 acres) and 025-260-022 (approximately 160.0 acres). The Project parcels are designated as "Recreation/Open Space" in the Imperial County General Plan and APNs 025-260-011 and 025-260-019 are zoned S-2-RE (Open Space/Preservation with a Renewable Energy overlay) and APN 025-260-022 is zoned A-2-RE, (areas that are suitable and intended primarily for agricultural uses [limited] and agricultural related compatible uses with a Renewable Energy Overlay), A-3-RE (areas that are suitable for agricultural land uses; to prevent the encroachment of incompatible uses onto and within agricultural lands; and to prohibit the premature conversion of such lands to non-agricultural uses with a Renewable Energy Overlay) and S-2-RE.

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.

A new substation would be constructed on the southwestern boundary of APN 025-260-022. The substation would include a transformer, circuit breakers, meters, disconnect switches, and microwave or other communication facilities. Underground or overhead 12.5 kilovolt (kV) to 34.5-kV collection lines would transmit the electricity to the new Project substation. Distribution from the site would be via either an underground or an overhead connection to the proposed 92kV generator intertie ("gen-tie") line and delivered to the existing Imperial Irrigation District (IID) approved point of interconnection (POI) at the IID 92kV "Midway" Substation.

A battery energy storage system (BESS) is proposed on the VEGA SES 5 Project Site located in the southeastern corner of APN 025-260-022. The proposed BESS would consist of either lithium ion or flow batteries. The batteries will either be housed in storage containers or buildings fitted with heating, ventilation and air conditioning (HVAC) and fire suppression systems as necessary, depending on the final selection of battery technology. Inside the housing the batteries will be placed on racks, the orientation of which depends on the type of housing. Underground trenches with conduits will be used to connect the batteries to the control and monitoring systems, and inverters to convert the PV produced direct current (DC) power to alternative current (AC) power.

Construction activities would primarily involve demolition and grubbing; grading of the 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 Site at the beginning of construction and removed at the end of construction. Onsite parking would be provided for all construction workers.

The VEGA SES 5 site would include two primary driveways and a secondary driveway (if required). The primary driveway on APN 025-260-019 would be located in the northwestern corner of the parcel off of

Noffsinger Road, while the driveway on APN 025-260-022 would be located along Weist Road which runs parallel to the western boundary of the parcel.

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 Site would be infrequent and limited to authorized personnel.

Conceptual plans for the Vega SES 5 Project is 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 5 Solar and Battery Storage Project.

- 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 Project 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 studies 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.

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 area was 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.

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Topography

Topography is relatively flat with elevations range between -20 meters (-65 feet) and 7 meters (22feet) above mean sea level. Adjacent land uses include active agriculture land to the west, the East Highline Canal which bisects the site from north to southeast, and a portion of Siphon Five which travels through the northeast portion of the site. 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" and "Agriculture" by the Imperial County General Plan and are zoned S-2-RE (Open Space/Preservation with a Renewable Energy overlay), A-2-RE (Limited Agriculture with a Renewable Energy overlay) and A-3-RE (Buffer Agriculture 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 Site consists of fallow agricultural land, creosote bush scrub, bush seepweed scrub, and tamarisk thickets. Other vegetation types present include iodine bush scrub. Small portions of the area adjacent to the proposed gen-tie alignment along the canal are urban/developed land. 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. Eight previously recorded resources and fifteen 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 site, two 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 two key views is provided below and key view locations are depicted in Figure 3 (Attachment A).

2020-144



Key View 1: Noffsinger Road, North of Wash Area – Vega SES 5

Key View 1 is a view from Noffsinger Road, north of the wash area facing south. The dominant feature within this key view is the vegetation visible throughout the view and Noffsinger Road in the immediate foreground. There are no distant topographic features in the background. This view does not exhibit any striking or distinctive visual patterns. The view is free from encroaching man-made elements.



Key View 2: Wiest Road, South of McDonald Road – Vega SES 5

Key View 2 is a view from Wiest Road, south of McDonald road facing east. The dominant features within this key view are the vegetation visible only in the foreground and a fallow agricultural field in the middleground. The Chocolate Mountains are barely visible in the background because they are masked by atmospheric conditions (e.g., haze). This view does not exhibit any striking or distinctive visual patterns; however, the presence of the scenic mountains in the background, although masked by haze, provide an aesthetic resource somewhat visible within the view. While overhead power lines are visible within this key view, it is mostly free from 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 5 Solar and Battery Storage 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. No scenic resources are visible within this view and no scenic vista points are identified in the County General Plan. None of the roadways in the Project vicinity are designated scenic highways or roadways.

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 to medium shrubs and views. 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 construction of gen-tie poles and electrical lines would not be visible from this key view.

The Imperial County General Plan has designated the Project site within this key view 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 the fallow agricultural field and grading of the Project site to accommodate the construction of solar equipment and security fencing.

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 result in the obstruction of the Chocolate Mountains due to the distance away from this vantage point. However, 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 Wiest Road. The construction of gentie poles and electrical lines would not be visible from this key view.

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 former agricultural area with energy-related facilities, agricultural 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 Project 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 a 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 Site 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 eight previously recorded resources and fifteen 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 obstructed by the PV arrays at Key View 2, current views of the mountains are already masked by atmospheric conditions (e.g., haze) 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 affected by haze and distance. Solar PV arrays would be spaced approximately 15 to 25 feet apart allowing for views of the Chocolate Mountains within those spaces.

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 Project.

Sincerely,

Senior Environmental Planner ECORP Consulting, Inc.

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Attachments

Attachment A: Figures

Attachment B: Conceptual Plans



REFERENCES

,	f Imperial. 2008. County of Imperial General Plan Circulation and Scenic Highways Element. anuary
201	6. County of Imperial General Plan Circulation and Scenic Highways Element. March.
201	6. County of Imperial General Plan Conservation and Open Space Element. March.
ECORP. 20	020. Biological Technical Report Vega SES 2 and 3 Solar Projects. December
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G <u>tr</u>	Renewable Energy Laboratory. 2020. Research and Analysis Demonstrate the Lack of Impacts of Glare from Photovoltaic Modules. Website: https://www.nrel.gov/state-local-ribal/blog/posts/research-and-analysis-demonstrate-the-lack-of-impacts-of-glare-from-hotovoltaic-modules.html , Accessed March 25, 2021.

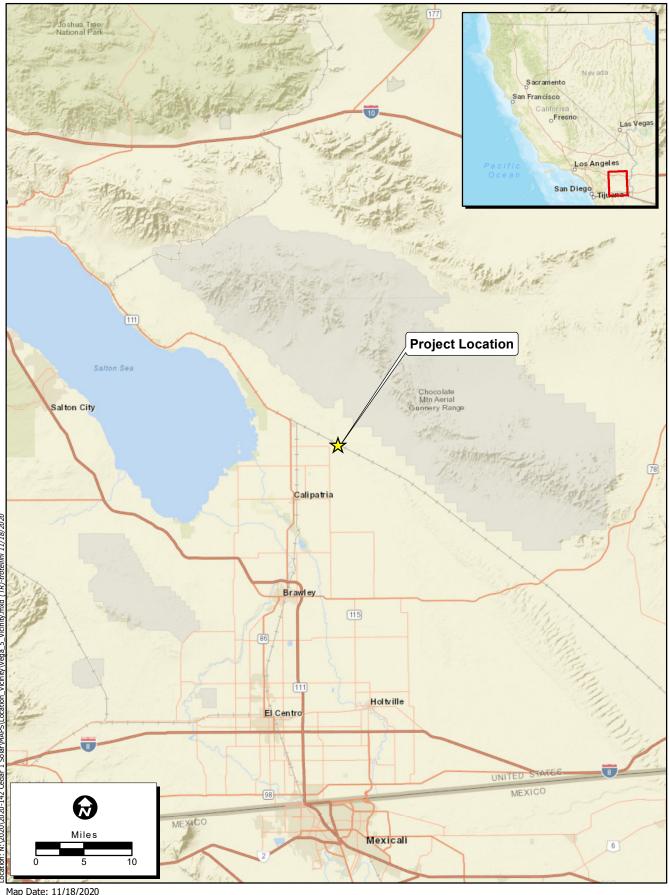
LIST OF ATTACHMENTS

Attachment A – Figures

Attachment B – Conceptual Plans

ATTACHMENT A

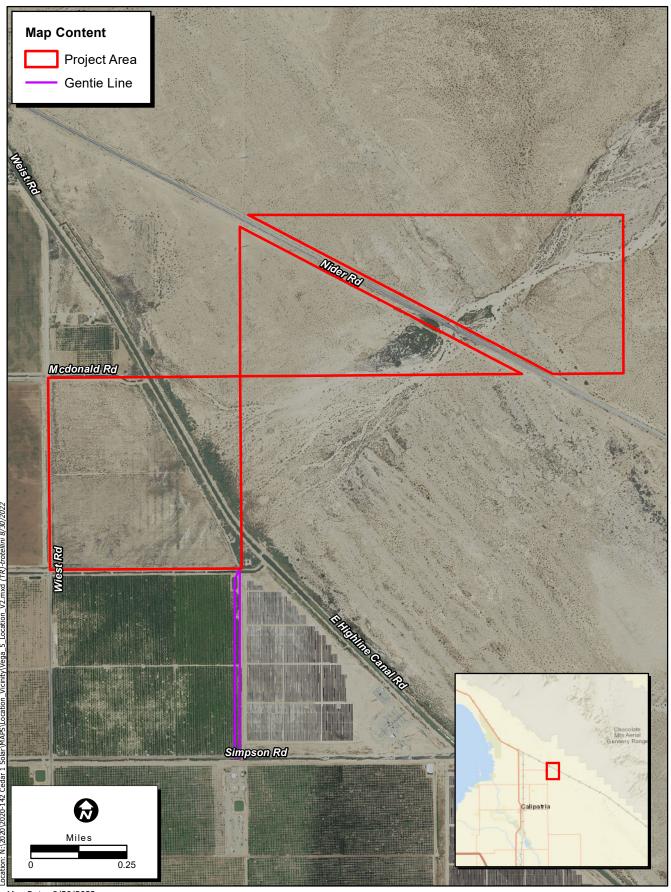
Figures



Map Date: 11/18/2020 Sources:

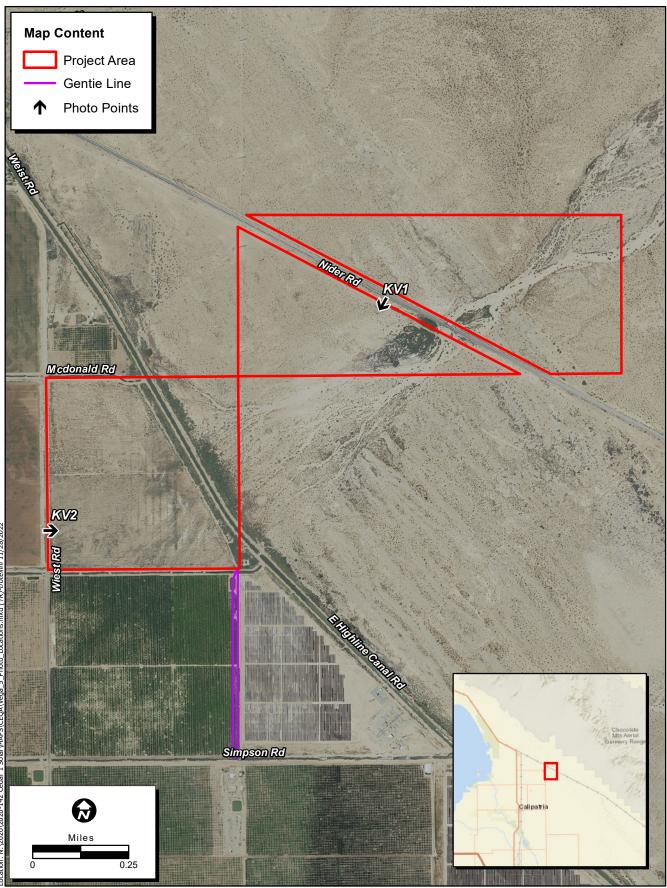


Figure 1. Project Vicinity 2020-144 Vega SES 5



Map Date: 8/30/2022
Service Layer Credits: Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korsa, Esri Thailand), NGCC, (c) OpenStreeMap contributors, and the GIS User CommunityPhoto Source: NAIP





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ATTACHMENT B

Conceptual Plans

