

Memorandum

To: California Energy Commission
CEC Docket No. 11-AFC-03, Quail Brush Power Generation Siting Case.
Attention: Mark Hamblin and Eric Solorio

From: Steve Blanchard, Santee resident

Date: 4/22/2012

Subject: **Photo Survey of Visual Impacts**, and Visual Resources Comments, Proposed Quail Brush Power Plant, San Diego CA

The visual resources evaluation (Section 4.5) of the Application for Certification (August 2011) significantly understates the negative impact of the proposed power plant location on the visual and aesthetic value of the surrounding area, particularly Mission Trails Regional Park (MTRP).

Photographs

The Application states in Section 4.5.1.3, Viewpoint Identification, that “Potential visual impacts are typically assessed by evaluating the visual effects of an action from a number of viewpoints that *represent the range of applicable viewing conditions.*” The standard approach is to *identify viewpoints that represent sensitive viewing areas....*” (italics added). The section goes on to list important public uses to consider such as camping, picnicking, and bicycling, all of which are popular at MTRP (although it is realized that the campground is currently day use only due to budget cuts). The section also states “investigation of potential *viewpoints included key locations within Mission Trails Regional Park....*” (italics added). Of the seven images presented as representative of the views toward the plant from MTRP, two in particular significantly misrepresent typical views from large areas of the eastern part of MTRP and therefore fail the criteria stated above (**Attachment A**).

Viewpoint 2: MTRP, Grasslands Section – this photo misrepresents the grassland area of MTRP, which typically consists of open areas of native grasses, and which includes historical resources. Instead, the photo shows brush and trees near the San Diego River channel, and it was taken in such a manner that one of the few larger trees blocks the view to the proposed plant location. Table 4.5-1 states that project site visibility from Viewpoint 2 is “low;” although this is strictly correct for that photo, the photo fails to depict a typical grasslands view and therefore the stated site visibility from a typical grasslands location is incorrect.

Viewpoint 7, MTRP, Fortuna Mountain – the text states this photo “..represents a *common*, high-elevation view available to MTRP trail users in the vicinity of the plant site.” (italics added) and “The transmission lines and landfill draw attention away from much of the surrounding terrain and detract from the scenic quality.” Depending on location in the park, the powerlines and landfill do have some impact on scenic quality; however, the implication that Viewpoint 7 is typical or representative of high-elevation views is simply wrong. There is only one alignment of power lines through the park, and the photo location is directly adjacent to those power lines such that they dominate the view. This photo falsely conveys that the typical view from higher elevation points in the eastern part of the park are severely impacted by power lines. Conversely, many of the popular trails in the eastern portion of the park emanate from Father Junipero Serra Trail (which itself is very popular) and are nowhere near the existing power lines to the north.

In addition, although Viewpoints 4 and 5 are typical of that location in general, those two viewpoints are very close together and are for all practical purposes the same. The Viewpoint 4 photo does not truly convey views from the Kumeyaay Campground because the campground is located further west and the photo does not include any campground features (entrance station, campsites) .

Overall, the visual assessment largely fails to realistically convey the actual visual and aesthetic impacts of the proposed plant on the adjacent MTRP high-use areas and its visitors. Some of the visual impacts from the proposed plant location include:

- direct line of sight at the Kumeyaay campground entrance station
- direct line of sight from benches at the lake
- viewable from the grinding rocks, a Kumeyaay native American historical site in the park
- viewable from numerous locations in the grasslands area
- viewable from the equestrian staging and picnic area, located just across SR52
- viewable from numerous higher elevation points along trails in the eastern part of the park
- direct line of sight on eastbound SR 52
- direct line of sight on eastbound Mission Gorge Road

The photographic survey in **Attachment B** more accurately represents visual impacts of the proposed plant to the eastern area of MTRP. Each photo was located on a map using a handheld Garmin GPS unit. This survey includes representative views from the grasslands and higher elevations that are nothing like the photos falsely depicted as representative at Viewpoints 2 and 7. The photographic survey includes paired images, one without and one with a generalized, modeled power plant. This modeled plant was created in Google Earth and then transferred onto the photos. The modeled plant gives a general idea of the potential visual impact, as it does not account for site grading, additional power lines, and other associated plant features.

Comments on Application Visual Resources Conclusions/Findings

The overall project conclusions give the strong impression this is an industrial area and that the project will not have significant impacts. Section 4.5.2.3, Project Visual Impacts, page 4.5-13 states: "While the Project will change the existing character of the site, significant impacts to the scenic attractiveness of the VSOI as a whole are not anticipated due to adjacent industrial scenery and other man-made developments. Therefore, less than significant impacts will occur relative to existing scenic attractiveness." Furthermore, the project impact summary states: "The analysis indicated that significant visual impacts from the Project are not expected." Finally, Section 4.5.2.4, Cumulative Visual Impacts, states: "The additional visual effects of the Project, in conjunction with the effects of the other activities discussed above, are not expected to result in cumulatively significant impacts to the visual setting within the VSOI. While future activities within the local area may result in visual impacts that are significant in their own context, the incremental contribution of the Project is not likely to measurably change the overall result."

The implication of this being an industrially-impacted area with minimal additional impacts from the plant is not well supported. The visual impact of the existing power lines and landfill (which is located further up Sycamore Canyon) relative to the impact of the power plant are overstated. These are different types of features and do not compare to placing a power plant with 11 100-foot high stacks by itself in an undisturbed open space area, right next to a major highway and in full view of well-used areas of MTRP and the surrounding residential areas. This power plant location would be an obvious additional degradation to the views in the area. Just because these other features are already present does not justify placing an additional industrial development at the planned location.

Section 4.5.5 Mission Trails Design District Ordinance, states "The intent of the regulations is to ensure that development along the edges of MTRP enhances the park's natural qualities and promotes the aesthetic and function quality of park/urbanization relationships, while recognizing the right to reasonable development within the Design District (SDMC 13:132.1201). The regulations are based on the assumption that most of the District will be developed for residential use....". This project clearly violates this ordinance and the proposed plant location is not compatible with this area.

Finally, the visual assessment largely fails to consider the value of MTRP to San Diegans. Visual impact goes beyond just a scientific office analysis according to CEQA and CEC regulations. According to the MTRP website (<http://www.mtrp.org/park.asp>):

Mission Trails Regional Park provides a quick, natural escape from the urban hustle and bustle.

Mission Trails Regional Park has been called the third Jewel in the City of San Diego Park System. Along with Balboa Park and Mission Bay, it provides San Diego residents and visitors a way to explore the cultural, historical, and recreational aspects of San Diego.

Started in 1974, Mission Trails Regional Park has become one of the largest urban parks in the United States.

With over 40 miles of trails, boating on Lake Murray, camping at Kumeyaay Lake, numerous informative hikes, and a state-of-the-art Visitor & Interpretive Center, Mission Trails Regional Park has something to offer everyone.

The MTRP Winter 2012 newsletter describes a recent Explore Mission trails Day:

The ninth annual Explore Mission Trails Day was held on May 21, 2011. The theme of the 2011 event was Introducing Children to Nature. Activities were staged at the Visitor Center, the Equestrian Staging Area and the Kumeyaay Lake Campground.

If the power plant is built in the planned location, added to MTRP's amenities will be multiple direct line of site viewpoints to the plant from throughout the eastern portion of the park. An example of impacts would be that children can learn about nature at the Equestrian Staging Area in the shadow of the 11 stacks. It is clearly inappropriate to place a power plant adjacent to such a valuable parkland resource.

Attachment A

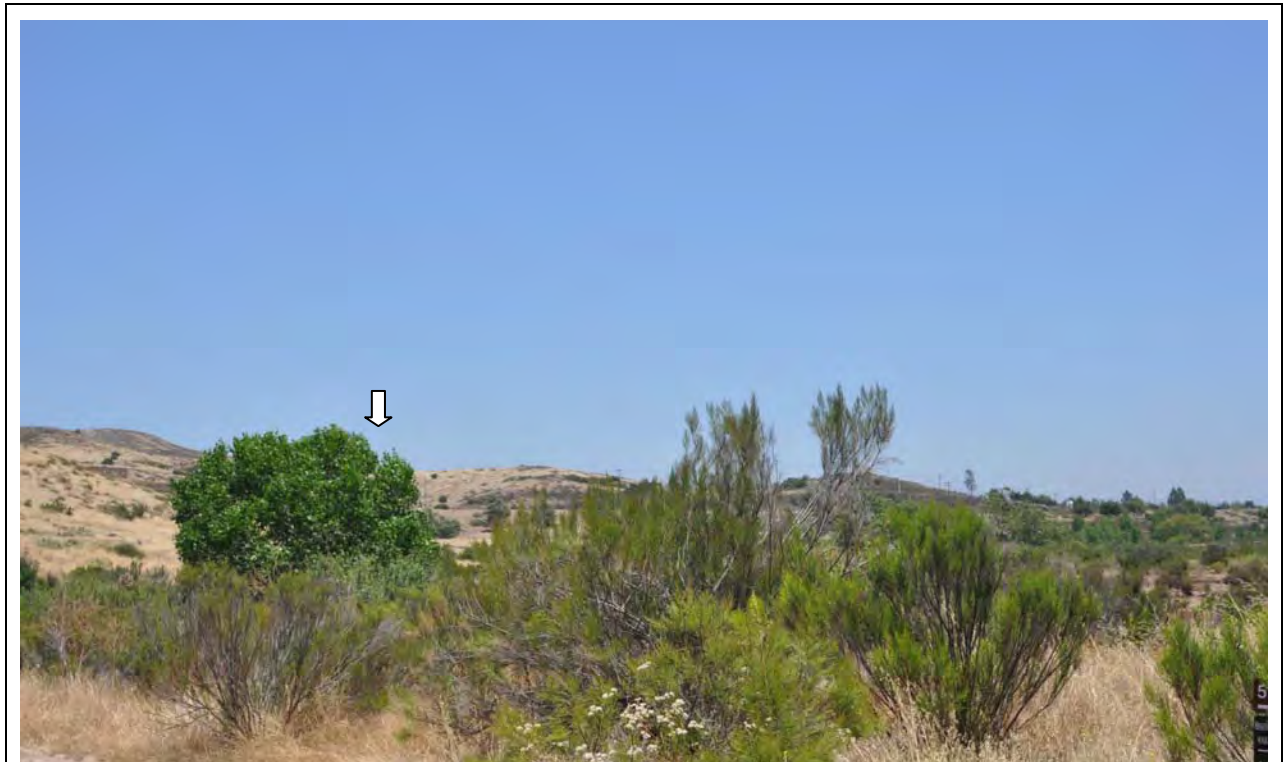
Viewpoint 2 and Viewpoint 7 Images

From the Application for Certification

Source:

Tetra Tech EC, Inc., 2011. Cogentrix Quail Brush Generation Project, Application for Certification.
Submitted to: California Energy Commission, Sacramento, California; Submitted by: Quail Brush Genco, LLC. August.

FIGURE 4.5-4
Viewpoint 2: MTRP, Grasslands Section Existing Conditions (looking northeast)



Arrow indicates approximate location of Project Site.

FIGURE 4.5-9
Viewpoint 7: MTRP, Fortuna Mountain Existing Conditions (looking east)



Arrow indicates approximate location of Project Site.

Attachment B

Photo Survey

Photo Locations from MTRP Looking Toward Proposed Quail Brush Power Plant



Mission Trails Regional Park Photo Survey, Visual Impacts of Proposed Quail Brush Power Plant



Elevated View, Photo 2534: along Kwaay Paay trail
(current view on left, view with simulated plant on right)

Mission Trails Regional Park Photo Survey, Visual Impacts of Proposed Quail Brush Power Plant



Elevated View, Photo 2547: along Kwaay Paay trail, Kumeyaay Lake visible center right
(current view on left, view with simulated plant on right)

Mission Trails Regional Park Photo Survey, Visual Impacts of Proposed Quail Brush Power Plant



Elevated View, Photo 2550: along Kwaay Paay trail
(current view on left, view with simulated plant on right)

Mission Trails Regional Park Photo Survey, Visual Impacts of Proposed Quail Brush Power Plant



Elevated View, Photo 2554: along Kwaay Paay trail, near Bushy Hill trailhead
(current view on left, view with simulated plant on right)

Mission Trails Regional Park Photo Survey, Visual Impacts of Proposed Quail Brush Power Plant



Elevated View, Photo 4209: along Kwaay Paay trail, junction of two trails (note hikers; they are about at photo location 2547)

(current view on left, view with simulated plant on right)

Mission Trails Regional Park Photo Survey, Visual Impacts of Proposed Quail Brush Power Plant



Elevated View, Photo 4189-92 panorama, along Kwaay Paay trail
(current view; see next slide for simulated plant)

Mission Trails Regional Park Photo Survey, Visual Impacts of Proposed Quail Brush Power Plant



Elevated View, Photo 4189-92 panorama, along Kwaay Paay trail
(view with simulated plant)

Mission Trails Regional Park Photo Survey, Visual Impacts of Proposed Quail Brush Power Plant



Elevated View, Photo 4197: along Kwaay Paay trail
(current view on left, view with simulated plant on right)

Mission Trails Regional Park Photo Survey, Visual Impacts of Proposed Quail Brush Power Plant



Elevated View, Photo 4205: along Kwaay Paay trail, near Mission Dam trailhead
(current view on left, view with simulated plant on right)

Mission Trails Regional Park Photo Survey, Visual Impacts of Proposed Quail Brush Power Plant



Father Junipero Trail, the only road through Mission Gorge, one - way only to the east for vehicles, Photo 4208: as visitors exit Mission Gorge and approach the historic Old Mission Dam, they would get a direct view of the plant

(current view on left, view with simulated plant on right)

Mission Trails Regional Park Photo Survey, Visual Impacts of Proposed Quail Brush Power Plant



Grasslands Area , Photo 2602, park information panel
(current view on left, view with simulated plant on right)

Mission Trails Regional Park Photo Survey, Visual Impacts of Proposed Quail Brush Power Plant



Grasslands Area , Photo 2620, park bench; direct view across San Diego River to the plant
(current view on left, view with simulated plant on right)

Mission Trails Regional Park Photo Survey, Visual Impacts of Proposed Quail Brush Power Plant



Grasslands Area, Photo 2604, view from Kumeyaay Grinding Stones; the plant will be clearly visible from this historical site

(current view on left, view with simulated plant on right)

Mission Trails Regional Park Photo Survey, Visual Impacts of Proposed Quail Brush Power Plant



Grasslands Area , Photo 2606, direct-line of sight view of the plant along nearly this entire section of the grasslands loop trail

(current view on left, view with simulated plant on right)

Mission Trails Regional Park Photo Survey, Visual Impacts of Proposed Quail Brush Power Plant



Grasslands Area , Photo 2608, at least a partial plant view
(current view on left, view with simulated plant on right)

Mission Trails Regional Park Photo Survey, Visual Impacts of Proposed Quail Brush Power Plant



Near Equestrian Staging Area , Photo 2615
(current view on left, view with simulated plant on right)

Mission Trails Regional Park Photo Survey, Visual Impacts of Proposed Quail Brush Power Plant



Equestrian (multi-use) staging area
Photo 2611: parking area, the
plant will be clearly visible

(current view on top, view with simulated plant
on bottom)



Mission Trails Regional Park Photo Survey, Visual Impacts of Proposed Quail Brush Power Plant



Equestrian (multi-use) staging area Photo 2612: picnic area and park information panels; the plant will be clearly visible from picnic tables

(current view on left, view with simulated plant on right)

Mission Trails Regional Park Photo Survey, Visual Impacts of Proposed Quail Brush Power Plant



Campground and Kumeyaay Lake Area, Photo 2556: parking area
(current view on left, view with simulated plant on right)

Mission Trails Regional Park Photo Survey, Visual Impacts of Proposed Quail Brush Power Plant



Campground and Kumeyaay Lake Area, Photo 2589: parking area and park information panel
(current view on left, view with simulated plant on right)

Mission Trails Regional Park Photo Survey, Visual Impacts of Proposed Quail Brush Power Plant



Campground and Kumeyaay Lake Area, Photo 4073: entrance station; direct line of sight to the plant for all visitors entering this area (it is noted that from this perspective the plant would be partly covered by a small tree)

(current view on left, view with simulated plant on right)

Mission Trails Regional Park Photo Survey, Visual Impacts of Proposed Quail Brush Power Plant



Campground and Kumeyaay Lake Area, Photo 2560: view from a campsite
(current view on left, view with simulated plant on right)

Mission Trails Regional Park Photo Survey, Visual Impacts of Proposed Quail Brush Power Plant



Campground and Kumeyaay Lake Area, Photo 2564: Kumeyaay Nature Trail; direct line of sight to the plant across the lake from information panel. This lake and trail is noted as being a “favorite with birders” on the MTRP website (this wide-angle image makes the plant appear smaller than it actually would appear)

(current view on left, view with simulated plant on right)

Mission Trails Regional Park Photo Survey, Visual Impacts of Proposed Quail Brush Power Plant



Campground and Kumeyaay Lake Area, Photo 2565: Kumeyaay Nature Trail, view from a park bench across the lake would have direct line of sight to the plant (see next photo of bench location)

(current view on left, view with simulated plant on right)

Mission Trails Regional Park Photo Survey, Visual Impacts of Proposed Quail Brush Power Plant



Campground and Kumeyaay Lake Area, Photo 2566: Kumeyaay Nature Trail, companion photo to 2565, showing park bench lower left; direct line of sight to the plant

Mission Trails Regional Park Photo Survey, Visual Impacts of Proposed Quail Brush Power Plant



Major travel route, Photo 4057: SR52 is one of two major east/west routes into Santee. On a clear day this view extends all the way to El Cajon Mtn and Cuyamaca Peak to the east; the plant would be in the foreground of that view with direct line of sight all the way down the hill

(current view on left, view with simulated plant on right)

Mission Trails Regional Park Photo Survey, Visual Impacts of Proposed Quail Brush Power Plant



Major travel route, Photo 4060: SR52 is one of two major east/west routes into Santee and points further east. The plant will sit right next to 52 at the gateway to Santee and will dominate this location (photo taken at Mast exit ramp; GPS coordinate unavailable).

(current view on left, view with simulated plant on right)

Mission Trails Regional Park Photo Survey, Visual Impacts of Proposed Quail Brush Power Plant



Major travel route, Photo 4053: Mission Gorge Road is one of two major east/west routes into Santee. The plant would be obvious to commuters on this road with a direct line of sight
(current view on left, view with simulated plant on right)