

3.12 VISUAL RESOURCES

The incremental amendment change to the existing Larkspur Energy Facility, as described in Section 2.0, Project Description of this document, would not substantially change the visual resources findings and conclusions in Section 15.0 (Visual Resources) of the 2001 AFC.

3.12.1 Environmental Baseline

3.12.1.1 Project Site

The visual character of the Project area consists of flat grassland and rolling hills covered by low-growing shrubs and fallow fields interspersed with heavy industrial park developments and few spaced rural residences. The existing Larkspur Energy Facility site contains two natural gas fired CTGs and their ancillary equipment/structures. The visual characteristics resulting from the Project, as an increment to the existing Larkspur Energy Facility, will be similar to the visual characteristics of the existing facility. The Project site does not contain any features that would be considered scenic, and has a low level of visual quality because of the industrial character of the surrounding land uses.

The Project site is located on the undeveloped eastern portion of the existing Larkspur Energy Facility parcel and currently consists of ornamental landscaping planted during development of the existing facility. The Project site is bordered by Otay Mesa Road to the north and a large area of vacant County land beyond the roadway. The existing Larkspur Energy Facility, Harvest Road and SR-905 are located west of the Project site. SDG&E facilities and associated transmission lines are located adjacent to the south, and beyond the substation is a CalPeak power station. To the east the land is undeveloped between the Project site and Sanyo Road. Beyond Sanyo Road to the east is a commercial complex and an industrial park. The nearest residences are located approximately 0.5-mile away (see Figure 2-2, Project Site and Vicinity Map).

The Project would be visible (and varying levels) to travelers on Otay Mesa Road and Sanyo Road, to residences located east of the Project site down Otay Mesa Road and Alta Road, and to eastbound traffic traveling along SR-905.

3.12.1.2 Key Observation Point Identification and Simulations

Four Key Observation Points (KOPs) (KOP 1 through 4) were chosen to help identify and assess potential visual impacts from the Project. These KOPs were selected in concurrence with CEC staff in locations that represent key sensitive views or potentially significant visual impact locations such as Otay Mesa Road, SR-905, and residential areas surrounding the Project site (see Figure 3.12-1, KOP Locations). Simulations were created for each of the KOPs. The simulations consist of a photo simulation that, when compared side-by-side with the existing KOP photo, will help the reader visualize the proposed change to the Project area. A computer-generated rendering of the Project is added to the KOP photo of the site taken in the field (aka the “before” photo) to create an “after” photo. These “before” and “after” visual simulations are easily understood visual representations of the Project’s visual impacts.

The four KOPs consist of residential views from Otay Mesa Road and Alta Road, and traveler views from Otay Mesa Road and SR-905. In addition to the KOPs, travelers along Airway Road, Sanyo Road, or

employees in the commercial areas to the east may have views of the Project site. The KOPs were selected to represent the most likely and most sensitive views of the Project. The KOPs and the Project simulations are presented in Figures 3.12-2 through 3.12-9.

3.12.2 Environmental Consequences

3.12.2.1 Project Overview

The existing Larkspur Energy Facility is contained within one 3.44-acre (approximate 300-foot by 500-foot) parcel of land. This entire parcel was previously examined in the 2001 AFC. The incremental change to the existing Larkspur Energy Facility, the proposed Larkspur 3 Energy Facility (the Project) is an approximate 0.9-acre (approximate 300-foot by 100-foot) area within this parcel. The Project is located at the southeast corner of Otay Mesa Road and Harvest Road in the Otay Mesa Development District in the incorporated City of San Diego, California (see Figure 2-1, Project Site and Vicinity Map).

The Project includes the addition of one GE LM6000-PC Sprint® natural gas CTG to the existing Larkspur Energy Facility which currently contains two CTG units (Unit 1 and Unit 2). The proposed Unit 3 is a nominal 47 MW natural gas-fired simple-cycle unit that will be located immediately east and adjacent to Units 1 and 2 (see Figure 2-1, Site Plan). In addition, a 600 kW natural gas fired reciprocating engine will be installed to provide black start capabilities. This will result in increasing the power generation capacity from nominal 94 MW to a combined total of nominal 141 MW.

In addition, the Project will require use of a temporary construction laydown area, including worker parking. The laydown area would reutilize a parcel located at the southeast corner of the Heinrich Hertz Drive/Airway Road intersection (APN 646-142-10; approximately 3.89 acres). It should be noted that an alternative temporary laydown area, adjacent parcel (APN 646-142-09; approximately 3.52 acres), was also assessed as part of this amendment. Both parcels are considered highly disturbed and both were previously used as construction laydown for the existing Larkspur Energy Facility.

The most substantial visual change associated with the Project is the addition of the CTG unit, most notably, the addition of a third 60-foot high stack (see Figure 2-3, Site Elevations). The proposed CTG unit (Unit 3) will be the same height and be oriented in a north/south configuration consistent with the existing CTG units (Units 1 and 2) at the existing Larkspur Energy Facility. Although the mass and scale of the Project will add incrementally to the overall viewshed character of the existing Larkspur Energy Facility, the Project is characterized as an adverse, yet less than significant impact to visual resources.

Other visual changes will include the extension of the existing 10-foot high noise wall that runs along the northernmost boundary of the existing Larkspur Energy Facility. This approximately 300-foot long wall will be extended by approximately 90-feet (see Figure 2-2, Site Plan for location). This wall extension will likely help the Project blend with the existing Larkspur Energy Facility. Therefore, visual impacts relating to this incremental change are not deemed significant.

In addition, two noise barriers are proposed, to be located within the Project facility, adjacent to the two existing fuel gas compressor skids (see Figure 2-2, Site Plan for location). These noise barriers will only be visible from the southernmost property boundary, where the property abuts the SDG&E facilities. Because there will likely be few viewers at this southernmost boundary, visual impacts relating to these

two additional noise barriers are not deemed significant. See Section 3.7, Noise for additional information on noise barriers.

The 69 kV connections from the high side of the generator step-up transformer will be routed overhead to the existing dead end structure and connected to the SDG&E substation on the existing lines. No new transmission lines or structures are proposed for the Project. The natural gas line, water pipeline, and sanitary sewer line connections will remain unchanged. These lines are currently underground, and therefore, are not visible. Interconnections to existing pipelines may be visible, however, are not deemed to be significant.

3.12.2.2 KOP 1 – Eastbound SR-905 Traveler View

This KOP represents traveler views along eastbound SR-905 (see Figures 3.12-2 and 3.12-3). While travelers along SR-905 have relatively un-obscured views of the existing Larkspur Energy Facility site (as there are currently no structures on the Project site), traveler views of the site are blocked by the existing facility. Project structures will be largely obscured from view by the existing facility structures. Likewise, as the proposed CTG Unit 3 will be relatively similar in profile to the existing Units 1 and 2 and consistent with the north-south alignment of existing structures, SR-905 traveler views of the Project will be virtually blocked by the existing Larkspur Energy Facility. Furthermore, due to the briefness of viewer exposure to the Project; the low visual quality expectation of the area by travelers in this industrial sub-district contributes to low viewer sensitivity for this view. Therefore, Project-related visual impacts for this KOP, as an incremental change to the existing Larkspur Energy Facility, are anticipated to be less than significant.

3.12.2.3 KOP 2 – 6940 Otay Mesa Road, Residential View

KOP 2 represents “worst-case” resident views of the Project from the nearest residences, located approximately 0.5-miles east of the Project site (addressed; 6940, 6944, and 6948 Otay Mesa Road). Due to the industrial nature of surrounding development, the visual character and quality of the Project area are rated low; however, because residential viewers have constant, longer duration views of the Project and as residential viewers are more sensitive/susceptible to view changes, viewer sensitivity for this KOP is deemed moderate. Although residents along Otay Mesa Road have relatively un-obscured views of the Project site, these residences are relatively distant and are considered to have mid-ground views. Commercial structures and overhead utility lines lay within the foreground that distract from views of the Project; therefore, viewer exposure is deemed moderate/low.

Additionally, Unit 3 is similar in visual appearance to the existing Units 1 and 2 (see Figures 3.12-4 and 3.12-5). Therefore, Project-related visual impacts for this KOP, as an incremental change to the existing Larkspur Energy Facility, are expected to be less than significant.

3.12.2.4 KOP 3 – Otay Mesa Road, Traveler View

KOP 3 represents traveler views along Otay Mesa Road. As Otay Mesa Road acts as the northern border of the Project site, travelers will have extensive direct views to the Project (see Figures 3.12-6 and 3.12-7). The frequency of travelers along this road is high; however, travelers are in route and pass by the Project site rapidly. Therefore, viewer exposure is deemed moderate. As the Project area has a highly

industrial character, and the existing Larkspur Energy Facility currently has two similar CTG stacks immediately adjacent to the site, existing visual quality of this view is rated low. The low visual quality expected by the average traveler in this area contributes to a low level of viewer sensitivity.

The Project includes extension of the existing 10-foot wall along the northern boundary of the site. Thus, due to its height, the proposed CTG Unit 3 stack will be the dominant addition to the view. However, given its context, the presence of a third gas turbine and associated structures will not adversely affect the view's current character or its current level of visual quality. Therefore, Project-related visual impacts for this KOP, as an incremental change to the existing Larkspur Energy Facility, are expected to be less than significant.

3.12.2.5 KOP 4 – 655 Alta Road, Residential View

This view represents views from the residences located at 655 Alta Road (see Figures 3.12-8 and 3.12-9). Although these residents have a view of the Project site, these homes are located approximately 2 miles to the northeast and are considered to have background views of the proposed site. Due to the distance from the Project site, viewer sensitivity and viewer exposure are considered low. The Project site is located at such a distance that it virtually blends in with the visual pattern elements that currently exist in the area. Thus, no change to the visual quality or character of the area is anticipated.

The Project will slightly contribute to the visual continuity of industrial development to the south of Otay Mesa Road, however, overall the landscape extending towards the site is diverse and Project components would blend in. Therefore, Project-related visual impacts for this KOP, as an incremental change to the existing Larkspur Energy Facility, are expected to be less than significant.

The following table summarizes visual impacts associated with the Project.

**TABLE 3.12-1
VISUAL IMPACTS TO KOPS**

KOP	Visual Character		Visual Quality		Viewer Response				Resulting Visual Impact
	Before	After	Before	After	Sensitivity		Exposure		
					Before	After	Before	After	
KOP 1	Dominant Industrial w/ Rural Open Space Influences	Dominant Industrial w/ Rural Open Space Influences	Low	Low	Low	Low	Mod	Mod	Low
KOP 2	Rural Residential w/ Industrial Views	Rural Residential w/ Industrial Views	Low	Low	Mod	Mod	Mod/Low	Mod/Low	Mod/Low
KOP 3	Dominant Industrial w/ Rural Open Space Influences	Dominant Industrial w/ Rural Open Space Influences	Low	Low	Low	Low	Mod	Mod	Low
KOP 4	Rural Residential w/ Industrial Views	Rural Residential w/ Industrial Views	Mod	Mod	Low	Low	Low	Low	Low

Based on analysis of potential visual receptors, visual effects will be minimal, and any Project-related visual impacts, as an incremental change to the existing Larkspur Energy Facility, are expected to be less than significant.

3.12.2.6 Light and Glare

The Project site is approximately 0.6-mile east of the Brown Field Municipal Airport. The existing Larkspur Energy Facility is currently in compliance with FAA standards for marking and lighting structures constructed near public airports and landing strips. As discussed, the proposed Unit 3 stack height (60 feet) would be equal to the existing stack heights of Units 1 and 2. There will be no change in the provisions for night lighting at the site and the Project's light-related impacts, as an increment to the existing Larkspur Energy Facility, will continue to be less than significant.

3.12.2.7 Plumes

Plume formation depends upon highly variable atmospheric conditions and the potential for visible plumes is highly variable and indeterminate. As discussed in Section 3.1, Air Quality, Project operations will result in insignificant emissions of visible substances. Thus, the Project's visual plume-related impacts, as an increment to the existing Larkspur Energy Facility, will continue to be less than significant.

3.12.3 Mitigation Measures

No mitigation measures are necessary at this time as the Project would not create significant impacts to visual resources as an increment to the existing Larkspur Energy Facility. Furthermore, opportunities for planting on the site are limited due to the limited area of the Project site. However, a formal Landscape Plan shall be developed as part of the final Project design and engineering.

3.12.4 Consistency with LORS

Construction and operation of the proposed Larkspur 3 Energy Facility will conform with all applicable LORS related to visual resources as described below and in Table 3.12-2.

**TABLE 3.12-2
SUMMARY OF LORS**

LORS	Requirements	Conformance to Requirements	Administering Agency
Federal			
Federal Aviation Administration Guidelines for marking and lighting structures Advisory Circular 70/7460-1K	Requires the FAA standards for marking and lighting structures such as buildings, chimneys, antenna towers, cooling towers, storage tanks, supporting structures of overhead wires, etc.	Project structures will be in compliance with Advisory Circular 70/7460-1K	FAA
State			
CEQA (Public Resources Code sections 21000-21177), and (California Code of Regulations sections 15000-15387)	Provides a framework for addressing impacts to visual resources and requires the mitigation of all impacts to less than significant levels	Impacts to visual resources were not identified for this Project	CEC
CEC Regulations	Title 20. Public Utilities and Energy, section 1769 Post Certification Amendments and Changes	No new information changes or undermines the assumptions, rationale, findings, or other bases of the final decision. No impacts to visual resources were identified for the Project	CEC
Local			
San Diego County General Plan	Provides guidelines for the protection of scenic and visual resources	The Project would not create significant visual impacts conflicting with San Diego County General Plan Guidelines	San Diego County Planning Department

TABLE 3.12-2
SUMMARY OF LORS
(CONTINUED)

LORS	Requirements	Conformance to Requirements	Administering Agency
City of San Diego General Plan	The City of San Diego's Significance Determination Thresholds and Initial Study Checklist provide guidance in determining potential significant impacts to Visual Quality and Neighborhood Character	This area is zoned for industrial heavy use. The proposed use is a permitted use and will not create a potential for significant impacts	City of San Diego Planning Department
Otay Mesa Industrial Sub-district (San Diego Municipal Code, Chapter 10, Article 3, Division 11)	The Otay Mesa Industrial Sub-district is designed to control the use, development intensity, and development design of a primarily industrial area. One of the objectives of this Division is to expedite the processing of development permit applications	The Project will be in conformance with all regulations specific to the Otay Mesa Development District	City of San Diego Planning Department

3.12.4.1 Federal and State

The visual resource analysis was conducted in conformance with CEC guidelines for the inventory and assessment of visual impacts as well as those outlined in the CEQA guidelines for addressing impacts to visual resources. The study methods used were based upon those established in CEQA as well as previous methodologies used in other CEC studies, and other energy related projects. The methodology has been tailored to meet the specific issues and regulatory requirements associated with the proposed Larkspur 3 Energy Facility, as an increment to the existing Larkspur Energy Facility.

The Project would be in compliance with FAA standards for marking and lighting structures such as buildings, chimneys, antenna towers, cooling towers, storage tanks, and supporting structures of overhead wires that are constructed near public airports and landing strips.

3.12.4.2 Local

The Project is located in the Otay Mesa Development District within the incorporated City of San Diego. In addition, San Diego County land is located directly north across Otay Mesa Road and has foreground views of the Project. Therefore, local LORS were considered for Otay Mesa Developmental District, the City and County of San Diego.

As discussed in Section 3.6, Land Use, the Project site is zoned IH-2 and the Project is considered an allowable use within the IH-2 zone. The City of San Diego has several goals, policies, and significant thresholds concerning aesthetics and minimizing impacts to visual resources that relate to; neighborhood character/architecture, land form alteration, development features, and light and glare. In addition, the Otay Mesa Development District Plan was reviewed for guidelines relating to visual resources. The Project would comply with all City of San Diego development regulations.

The protection of scenic and visual resources is addressed within the County General Plan under several elements as well, including: the Scenic Highways Element, the Circulation Element, the Conservation Element, the Regional Land Use Element, the Recreation Element, and the Open Space Element. No Designated Scenic Highways are within the Project area, therefore there are no regulations mandated.

3.12.5 References Cited

California Energy Commission. 2001. Larkspur Energy Facility Conditions of Certification. Located at http://www.energy.ca.gov/sitingcases/peakers/larkspur/documents/01_Larkspur_SA.PDF.

CEQA Guidelines (Public Resources Code sections 21000-21177), and (California Code of Regulations sections 15000-15387), 2006.

City of San Diego, City of San Diego Municipal Code chapters 10 and 13 Municipal Code. Located at <http://clerkdoc.sannet.gov/Website/mc/mc.html>.

City of San Diego, City of San Diego General Plan, Final Public Review Draft, October 2006. Located at <http://www.sandiego.gov/planning/genplan/index.shtml>.

Federal Aviation Administration, Advisory Circular 70/7460-1K, Obstruction Marking and Lighting. Located at website <http://www.faa.gov>.

San Diego County, General Plan 2020. Located at <http://www.sdcountry.ca.gov>.

Wildflower Energy, Application for Certification Pursuant to the 21-Day Emergency Permitting Process Larkspur Energy Facility San Diego, California, March 7, 2001.

3.12.6 Conditions of Certification

This Amendment does not require changes to the conditions identified in the Visual Resources section of the Larkspur Energy Facility Conditions of Certification (CEC 2001).