

DATA REQUEST #24
VISUAL RESOURCES

BACKGROUND

The SPPE application identifies compliance with County landscaping requirements as a visual impact mitigation measure and indicates "landscaping will be incorporated into the Project so as not to add incrementally to the overall change in viewsheds," as stated on page 6.11-17 of the application. It is not possible to evaluate the adequacy of this proposed mitigation measure without viewing a representative site development and landscape plan(s).

DATA REQUEST

24. Please provide a conceptual Site development and landscaping plan, with plan and elevation views showing landscaping growth at five years, in order to illustrate how landscaping will be used to mitigate the project's visual impact.

DATA RESPONSE

24. Applicant apologizes for any confusion with respect to the various statements within the SPPE regarding the issue of landscaping and visual impacts. As stated in Section 6.11.4 of the SPPE, "Specific mitigation measures are not required because Project design elements have been incorporated into the Project description that will reduce potential Project visual impacts to below a level of significance." The Project does not intend to use landscaping as a mitigation measure as the visual impacts of the Project have been determined to be below a level of significance.

With respect to the use of landscaping in conjunction with the Project, Goal #3 in the Agriculture Authority Category of the Imperial County General Plan states: "Where a development permit is sought adjacent to agricultural land use, protect agricultural operations by requiring appropriate buffer zones between agricultural land and new developments, and then keep these zones aesthetically pleasing and free of pests by cleaning them of all garbage and noxious vegetation. Vegetation for the purpose of dust control shall be planted and maintained in an attractive manner. The buffer shall occur on the parcel for which the development permit is sought and shall favor protection of the maximum amount of farmland (Objective 3.6)." The Applicant is in the process of obtaining a Conditional Use Permit for the Project. It is known that agriculturally zoned lands are located to the north of the IID 160-acre Property (Property), but not adjacent to the 22-acre Project Site, which is on the southwestern corner of the Property. As such, the Applicant is currently in discussions with Imperial County to determine the applicability of the aforementioned land use designation. Applicant questions the practicality and sensibility of providing landscaping on the Project for a number of reasons.

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From a dust control perspective, Applicant will implement appropriate dust control measures during the construction phase of the Project, and dust generation during the operation phase will be negligible to none, as the Project will be largely unmanned and remotely operated. From an aesthetics perspective, there are no residences to the north of the Property. Lastly, from a water use and conservation perspective, Applicant questions whether the use of water to maintain such landscaping makes sense in light of the value of the water resource. The maintenance and water needs of potential landscaping features, over the life of the Project, would counter the benefit from landscaping given the dry, desert scrub environment of the Project area.

In the event that it is determined by Imperial County that landscaping shall be a necessary component of the Project, Applicant will seek to provide landscaping at an alternative location, perhaps within the Town of Niland, which would have greater public value and beneficial impact due to the greater number of viewers. If the County deems landscaping will be required, an agreed upon landscaping plan will be provided to the CEC.