Lockey, Heather@CNRA

From: John Edwards <jrickdance@yandex.com>
Sent: Thursday, March 15, 2018 3:56 PM
To: CEQA Guidelines@CNRA
Subject: Aesthetic Comments to Amendments and Additions to the State CEQA Guidelines California Natural Resources Agency
Attachments: CEQA Aesthetics.pdf

Dear Mr. Christopher Calfee,
Deputy Secretary and General Counsel California Natural Resources Agency

Attache are my comments concerning Aesthetics for the CEQA Regulation. I mention that better Aesthetic Impact Analysis guidance was needed in meeting yesterday in Los Angeles. This is a more detailed and specific set of comments that I made verbally.

Thank you for the opportunity to comment.

Sincerely
John R. Edwards

15 March 2018

Christopher Calfee,
Deputy Secretary and General Counsel California Natural Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, CA 95814

Subject: Recommendations to proposed AMENDMENTS AND ADDITIONS TO THE STATE CEQA GUIDELINES CALIFORNIA NATURAL RESOURCES AGENCY

Dear Mr. Calfee,

I hereby recommend that the CNRA proposed CEQA regulations include more useful guidance to preparers of EIRs regarding Aesthetic Impact Analyses. Yesterday in the public hearing you held in Los Angeles I made this general comment verbally. Here is more specific information about a repeatable assessment tool used on the Space Shuttle program (1), in the Nuclear industry (2) and on other projects (3).

The cause of my concern in this area is the apparent lack of understanding of aesthetics on the part of a contractor (Placeworks) doing the Initial Study for the City of Torrance on the Butcher-Solana Residential Development Project (4). They simply used the four questions in the Appendix-G Environmental Checklist Form (5). I require that you substitute a more quantifiable method. In Appendix G: Environmental Checklist Form it clearly states that "Substantial evidence of potential impacts that are not listed on this form must also be considered. The sample questions in this form are intended to encourage thoughtful assessment of impacts, and do not necessarily represent thresholds of significance." However in practice the contractor for the Torrance project just used the four items listed in Appendix G and did not explore additional impacts. I believe that that approach does not capture the significant Aesthetic impacts of the project, whereas using a more focused quantifiable approach would.

I searched through the CEQA Code (6) and Regulations (5), and found several places where Aesthetics was addressed. Based on that search I believe that the most appropriate place for the update is either in a new stand alone section on Aesthetics in the regulation, or in Appendix G. I have included excerpts of the Aesthetic Impact Analysis Technique and the relevant CEQA code and regulations below.

I recommend that the Aesthetic examples listed in Appendix G: Environmental Checklist Form be replace with or supplemented with the following:

The methodology utilized in this evaluation portrays anticipated visual changes in an accurate manner and describes the subjective effects of such change on the visual quality of the scene. Visual quality is taken to mean the sum of three components:
1) the memorability of a scene; (Vividness)
2) its degree of development; (Innocents)
3) the harmony of its parts; (unity)

Vividness 100= very dramatic scene
0= totally undramatic, boring scene

Intactness	100= totally natural condition, no development 0= totally developed area, no natural condition
Unity	100= maximum harmony between the parts (Similarity in form, line, color, and texture) 0= disharmonious, clashing

	Before (B)	After (A)
View 1 Vividness Intactness Unity		
View 2 Vividness Intactness Unity		
View 3 Vividness Intactness Unity		

Thank you for the opportunity to comment on your proposed changes to the CEQA Regulations.

Sincerely,

SIGNED

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MS Environmental Engineering - USC • Former Chief Environmental Management Division, USAF Space and Missile Systems Center (SMC) • Former Deputy Director Engineering and Architectures SMC • Former Planning Commissioner, Hermosa Beach, CA • White House Closing the Circle Award • Los Angeles Magazine Environmental Publishers Award

REFERENES:

(1) Aesthetic Impact Analysis of the proposed shallow draft barge Facility at the Point Arguello Boathouse, The Ralph M. Parsons Company TOR 101, 1977. [The analysis was prepared in support of the Space Shuttle Environmental Impact Statement for Vandenberg Air Force Base] [www.dtic.mil/dtic/tr/fulltext/u2/a413227.pdf]

(2) "A method for Quantification of Aesthetic Values for Environmental Decision Making", Nuclear Technology, Vol. 25, No. 4, April 1975.

(3) Landscape Planning, 3 (1976) 151--302 151 © Elsevier Scientific Publishing Company, Amsterdam -- Printed in The Netherlands Scenic and Recreational Highways Study for the State of Washington Grant R. Jones, John Ady and Brian A. Gray, Jones & Jones, Landscape Architects, Seattle, Wash. (U.S.A.) with Fred Utevsky, Paul Hendrickson and Glenn Wilfert (Consultant.) (Received 14 October 1976)
https://dokumen.tips/documents/scenic-and-recreational-highway-study-for-the-state-of-washington.html

(4) Initial Study, Butcher-Solana Residential Development Project, City of Torrance, Prepared by: Placeworks 700South Flower Street, Suite 600, Los Angeles, CA 90017, July 2017 [available on line]

(5) CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000– 15387) [http://ccr.oal.ca.gov/]

(6) CEQA (Public Resources Code 21000–21189) [http://leginfo.ca.gov/]

AESTHETIC IMPACT ANALYSIS TECHNIQUE

[Extracts from reference (1)]

The purpose of that study is: It is incumbent on designers to preserve the aesthetic qualities of scenic areas (that are to eliminate or minimize adverse visual impacts). In order to accomplish this, a method of evaluating the aesthetic value of sites and facilities is needed. This report provides a systematic approach to aesthetic evaluation – a pursuit generally assumed to be subjective. Our approach achieves a degree of objectivity by producing accurate

representations of the study object, identifying the field from which it is observable, and applying a systematic, reproducible aesthetic evaluation from within that field. While this report was developed to evaluate a specific proposed development, the methodology described herein is applicable to any project.

The methodology that should be for the project is to portray anticipated visual changes in an accurate manner and describe the subjective effects of such change on the visual quality of the scene. Visual quality is taken to mean the sum of three components: 1) the memorability of a scene; 2) its degree of development; and 3) the harmony of its parts. These components are respectively refereed to as vividness, innocents, and unity

The methodology utilized in this evaluation portrays anticipated visual changes in an accurate manner and describes the subjective effects of such change on the visual quality of the scene. Visual quality is taken to mean the sum of three components: 1) the memorability of a scene; 2) its degree of development; and 3) the harmony of its parts. These components are respectively refereed to as vividness, innocents, and unity.
There are three main aesthetic criteria used to analyze a viewscape: vividness, intactness, and unity. These criteria are equally weighted during analysis. A definition and detailed discussion of each criterion follows.
Vividness
Vividness is the memorability of the visual impression received from the viewscape or its elements. Vividness relates to the level of distinction resulting form contrast of diverse viewscape elements. Eight complementary effects are defined.
1. Definition of viewscape boundary. The viewscape boundary is the furthest visible limit of land reform, water form, or vegetation that acts as the skyline boundary for the viewscape. Viewscapes with strongly defined visual walls and with distinct or irregular skyline, profiles that are clearly legible and memorable are more vivid than viewscapes with poorly defined, indistinct, and hazy skyline boundaries. Jagged ridgelines and mountain peaks from highly distinct and legible middleground and background boundaries of the viewscape, while skyline edges of the forest or lower vegetation can clearly and distinctly define the viewscape boundary in the foreground and middleground. Smooth, regular skyline profiles are less distinct. Skyline boundary definition is very low where there is no legible distinction of skyline at all. Man-made elements can reduce the definition of a viewscape boundary by removing a portion of the boundary element or by blocking a portion of the element from view.
2. Diversity of spatial enclosure. The skyline boundary may be only one of many elements in the viewscape that encloses space. There may be other viewscape spaces, the overlapping walls of which are partly visible, e.g., views of consecutive ridges and valleys, or views with glimpses of several clearings within a wooded valley. A high diversity of spatial enclosure normally enhances the visual quality of a viewscape. This type of viewscape takes on another dimension, holding the observer's visual interest for longer periods than viewscapes in which every element and every space is immediately and readily seen and understood. Spatial enclosure is often more diverse as the number and configuration of vertical elements increases, as the overlapping vertical or sloping planes weave space between elements of the viewscapes.
Overlapping planes may be formed by vegetation, landform, and/or by man-made elements. However, man may also simplify or remove spatial definitions of landform and vegetation to convert the land to his own purposes.
3. Degree of topographic relief. The visual perception of topographic relief will often enhance the quality of a viewscape, adding to its vividness. The visual stimulation received from viewscape of mountains, hillsides, or canyons is often higher than that received from viewscapes of nearly

flat terrain. However, contrast between flat and high, steep or deeply incised terrain can also add to the visual perception of topographic relief. Man-made elements seen in the middleground (or foreground) may affect the observer's perception of the true size of landscape elements. They can block the observer's view and/or make landforms or differences in topographic relief seem smaller than they really are.

4. Diversity of vegetative pattern. Pattern is formed at the edge between two major types of vegetation, as between forest/shrubland/grassland/barren surfaces. Pattern can also exist within a major vegetation type and can be expressed as variation of from degrees of contrast and distinction or irregularity of vegetative edge and profile. Man's alterations nearly always influence vegetative pattern, sometimes increasing its diversity (e.g., increasing the length and configuration of vegetative edges, when creating alternate clearings, woodlots, and hedgerows) and sometimes decreasing vegetative diversity (e.g., removing or simplifying the existing patterns, when totally clearing forests and planting one single crop throughout, or by paving once-vegetated land).

5. Prominence of natural features. Prominent natural features and natural landmarks nearly always increase the vividness of a viewscape. Prominent natural landmarks nearly always increase the vividness of a viewscpae. Prominent natural features include those of land reform (distinctive mountain peaks, volcanic cones, gorges and canyons, or striking rock outcrops), vegetation (distinctive groupings of rare or specimen trees, a single majestic oak or a lonely, tenacious, windswept tree atop a rocky bluff), or water (waterfalls, geysers, glaciers, rapids, or springs), or combination of these. These striking and memorable natural features may owe their prominence to their uniqueness, isolation, distinctive profile, size/scale domination, or contrast with the surrounding viewscape elements. Man-made elements may visually compete with these natural features for attention, or may visually attract attention by complementing them. The vividness of natural features may be visually obscured or physically altered by man's actions or their vividness may be enhanced through careful design restraint.

6. Prominence of water forms. Water prominently displayed nearly always enhances the vividness and visual quality of a viewscape. Prominence refers not only to the actual amount of water that is visible but also to the degree that water enhances the viewscape by its color, value, and texture; by the steepness, height, clarity, and definition of the shoreline edge; and by the complexity of the water form pattern as woven into the overall viewscape elements. Man's alterations to the viewscape may enhance or degrade the vividness of water forms, depending on the degree and design sensitivity of the alteration.

7. Vividness of sky. Since the sky is the most highly ephemeral natural element of the viewscape, its visual quality is difficult to evaluate. Yet in most viewscape, the sky is among the largest visual elements present. Although constantly changing, various moods or types of skies are frequently associated with particular regions or areas of the country; e.g., cloudy, drizzling skies of the Pacific Northwest, clear, crisp skies of Eastern Washington and Oregon, silent fogs of San Francisco, or hazy orange smog's of Los Angeles. Assuming that each viewscape sky represents a relatively consistent condition, evaluation of vividness should take into consideration it's clarify, depth, contrasts of color and cloud pattern textures, and its prominence or memorably in the viewscape. Man's effects on the vividness of the sky can include visual competition, visual blockage, or the results of air pollution.

8. Vividness of man-made element. Buildings, bridges, dams, water towers, power lines, roads, and parking areas may or may not be highly vivid in the viewscape, depending more on their contrast, diversity, prominence, and level of visual distinction within the overall viewscape than on their size or number (as measured by intactness).

Intactness

The intactness of a viewscape is a measure of its apparent degree of natural condition as judged by its level or urbanization and the degree to which encroachment is present. One viewscape may display a very high degree of man- made development with very little visual disturbance (as in a well-designed, carefully maintained urban setting), while another may display a very high degree of visual disturbance and alteration with little apparent man- made development (as in a forested area recently devastated by fire). Hence, it is important to gauge the intensity of development along with the severity of visual disturbance and alteration when measuring the overall intactness of a viewscape.

Overall, intactness is likely to be scored somewhere between the scores for level of urbanization and degree of encroachment.

1. Level of urbanization is a measure of the apparency or presence of man-made development in the viewscape. The two extremes are immediately recognizable: views of apparently undisturbed landscapes devoid of roads structures or any sign of human settlement or activity as opposed to views of highly urban centers and dense industrial complexes.
2. Degree of encroachment is a measure of the presence or absence of undesirable, visually disturbing elements in the viewscapes. Encroachment includes such visual disturbances as garbage heaps, junk yards, trash and/or litter, confusing and inharmonious signs and billboards, mazes of overhead wires, the sources or visual results of air or water pollution, as well as the apparent level of man' physical alteration or visual obscurity of sky, land, or water forms, as by strip mining, clear cutting, road cuts/fills, wet land or shoreline filling or alterations, diking, rip-apping or culverting of streams or rivers, or visual intrusions and unhealed scare in the viewscape. Also included is any obvious effect of natural catastrophes such as the visual disturbances caused by fire, flood, or earthquake.

Unity

Unity is a measure of the degree to which individual elements in the viewscape join together to form a single, coherent, and harmonious visual unit. Unity refers to the compositional harmony or inter-compatibility of the individual elements that comprise the viewscape. Unity does to require similarity or blandness of interrelated elements; rather, it depends on an organized balance between visually dominant and subordinate viewscape elements. Vividness depends on visual contrasts and distinction between diverse viewscape elements, while unity quantifies heir visual coherence and compositional integrity. A viewscape of high visual quality is often likely to possess richness and diversity, making it highly vivid, while at the same time possessing a high degree of visual unity.

Overall, unity and the unity between man-made and natural elements are not necessarily the same as the level of urbanization or degree of encroachment, which together comprise viewscape intactness. Intactness is the relative degree of natural condition of the viewscape, while unity is indifferent to the degree of natural condition and is only concerned with visual integration of the viewscape composition.

A sample questionnaire from the survey on aesthetic impacts resulting from the SDB Facility is shown on page A6. This survey was conducted using the above criteria. A blank questionnaire form is included for the reader's independent evaluation.

Vividness	100= very dramatic scene 0= totally undramatic, boring scene
Intactness	100= totally natural condition, no development 0= totally developed area, no natural condition
Unity	100= maximum harmony between the parts (Similarity in form, line, color, and texture) 0= disharmonious, clashing

	Before (B)	After (A)
View 1 Vividness Intactness Unity		
View 2 Vividness Intactness Unity		
View 3 Vividness Intactness Unity		

CEQA CODE REFERENCES TO AESTHETICS:

§ 21001. ADDITIONAL LEGISLATIVE INTENT
The Legislature further finds and declares that it is the policy of the state to:
(a) Develop and maintain a high-quality environment now and in the future, and take all action necessary to protect, rehabilitate, and enhance the environmental quality of the state.
(b) Take all action necessary to provide the people of this state with clean air and water, enjoyment of **aesthetic**, natural, scenic, and historic environmental qualities, and freedom from excessive noise.

§ 21060.5. ENVIRONMENT
“Environment” means the physical conditions that exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, or objects of historic or aesthetic significance.

§ 21099.
(d) (1)

Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.
(2) (A) This subdivision does not affect, change, or modify the authority of a lead agency to consider aesthetic impacts pursuant to local design review ordinances or other discretionary powers provided by other laws or policies.
(B) For the purposes of this subdivision, aesthetic impacts do not include impacts on historical or cultural resources.
(e) This section does not affect the authority of a public agency to establish or adopt thresholds of significance that are more protective of the environment.

CEQA REGULATIONS REFERENCES TO AESTHETICS:

15360. ENVIRONMENT
“Environment” means the physical conditions which exist within the area which will be affected by a proposed project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historical or aesthetic significance. The area involved shall be the area in which significant effects would occur either directly or indirectly as a result of the project. The “environment” includes both natural and man-made conditions.
Note: Authority cited: Section 21083, Public Resources Code; Reference: Section 21060.5, Public Resources Code.

15382. SIGNIFICANT EFFECT ON THE ENVIRONMENT
“Significant effect on the environment” means a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant.
Note: Authority cited: Section 21083, Public Resources Code; Reference: Sections 21068, 21083, 21100, and 21151, Public Resources Code; Hecton v. People of the State of California, 58 Cal. App. 3d 653.

APPENDIX G: ENVIRONMENTAL CHECKLIST FORM
NOTE: The following is a sample form and may be tailored to satisfy individual agencies’ needs and project circumstances. It may be used to meet the requirements for an initial study when the criteria set forth in CEQA Guidelines have been met. Substantial evidence of potential impacts that are not listed on this form must also be considered. The sample questions in this form are intended to encourage thoughtful assessment of impacts, and do not necessarily represent thresholds of significance.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:
The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages.
Aesthetics

I. AESTHETICS. Would the project:

a) Have a substantial adverse effect on a scenic vista?
b) Substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within state scenic highway?
c) Substantially degrade the existing visual character or quality of the site and its surroundings?
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?