VISUAL RESOURCES		
Figures D.18-1 through D.18-6	**General Comment identifying issues associated with CPUC Preferred Alternative** Figures D.18-1 through D.18-6 comprise a set of maps that are all on the same base – i.e. they all show the entire route and label the individual line segments. The six maps differ from one another only in that each of the maps presents the results of GIS visibility analyses run for each of the individual line segments.	The map set referenced does not provide enough information to track the analysis and assess the relevance and accuracy of the findings. This is particularly true for those findings related to the impacts of the alternatives, for which no simulations have been provided.
Figures D-18-8A through D.18-25.B	**General Comment identifying issues associated with CPUC Preferred Alternative** The key observation point (KOP) figures present an existing photo of each view and simulations for each view of what the view would look like with the project in place. In two cases, simulations are also provided that depict how the views would appear should the FAA require marker balls.	There are no simulations that depict the appearance of the project alternatives. Such simulations are necessary to provide a basis for comparing the visual effects of the proposed project with those of the project alternatives in order to determine whether, in what way, and to what extent the visual effects of the alternatives could be different from those of the proposed project. Thus, there is no evidence for the conclusion that there would be significant unmitigable impacts under the proposed project but that the impacts would be less than significant under the Phased Build Alternative.
D.18-10	**San Timoteo Canyon Road.** The linear viewpoint analysis addressed the full extent of San Timoteo Canyon Road (see Figure D.18-7C) from its intersection with Barton Road in the north to its southern terminus with Oak Valley Parkway, a linear distance of almost 11.5 miles (northbound travel direction). As shown in Table D.18-8, the Proposed Project would be either not visible (due to screening by terrain and roadside vegetation) or visible but not noticeable for approximately 46 percent of the combined (northbound-southbound) travel distance of slightly more than 22.6 miles. However, given the Proposed Project's relatively close proximity to San Timoteo Canyon Road and frequent superior (elevated) loca-tion along the southern ridgeline, the Proposed Project would be prominently visible for 43 percent of the combined travel distance. However, at no point would the Proposed Project appear to be a dominant visual feature.	For clarification, please make the following revision: **San Timoteo Canyon Road.** The linear viewpoint analysis addressed the full extent of San Timoteo Canyon Road (see Figure D.18-7C) from its intersection with Barton Road in the north to its southern terminus with Oak Valley Parkway, a linear distance of almost 11.5 miles (northbound travel direction). As shown in Table D.18-8, the Proposed Project would be either not visible (due to screening by terrain and roadside vegetation) or visible but not noticeable for approximately 46 percent of the combined (northbound-southbound) travel distance of slightly more than 22.6 miles. Given the Proposed Project's relatively close proximity to San Timoteo Canyon Road and frequent superior (elevated) loca-tion along the southern ridgeline, the Proposed Project would be prominently visible for 43 percent of the combined travel distance consistent with the visibility of the current energy transmission infrastructure. However, at no point would the Proposed Project appear to be a dominant visual feature.
D.18-11	Viewer Concern. High. Although energy transmission infrastructure dominates the foreground views from the park within the corridor, from adjacent residential neighborhoods, and from roads that are spanned by the ROW and adjacent to the park, viewers would consider any increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change.	The environmental setting recognizes that energy transmission infrastructure dominates the foreground views from a variety of locations, however the text subjectively states, "…any increase in industrial character, structure prominence or view blockage of higher value landscape," would result in an adverse visual change. As seen in the KOP #1, the Proposed Project incorporates the use of similar lattice steel structures. Although these towers are taller, the industrial character would remain generally the same, the structure prominence is generally the same, and the view towards the mountains and sky is generally the same. The environmental setting fails to recognize or make mention of the prominence of the 66 kV lines that would be removed from the ROW. The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further, as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider "any" increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location. The analysis needs to be updated with supporting documentation, and the subjective conclusion that viewers would consider "any" change an adverse visual change should be removed from the environmental setting.