

VISUAL IMPACT ANALYSIS

PROPOSED CACTUS CLUB HOTEL

SAN BERNARDINO COUNTY
PROJ-2023-00061

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1.0 Introduction

The following Visual Impact Assessment was prepared for the proposed Cactus Club Hotel Project (Project) located within the unincorporated community of Joshua Tree within San Bernardino County (see Figure 1, Regional Location Map).

1.1 Purpose of the Visual Resources Report

The purpose of this study is to assess the visual impacts of the Project to determine the significance of the impacts under the California Environmental Quality Act (CEQA), and to propose measures to avoid, minimize, or mitigate adverse visual impacts associated with the construction of the project on the surrounding visual environment.

1.2 Key Issues

The key issues to be examined in this report are identified in the County's Guidelines for Determining Significance for Visual Resources and are;

1. Whether the project would result in a significant adverse impact with regard to the visual character and/or quality of a neighborhood, community, or localized area,
2. Would result in the removal or substantial adverse change to one or more features that contribute to the valued visual character or image of the neighborhood, community, or localized area,
3. Would substantially obstruct, interrupt, or detract from a valued focal and/or panoramic vista from:
 - A public road,
 - A trail within an adopted County or State trail system,
 - A scenic vista or highway, or
 - A recreation area.

1.3 Principal Viewpoints to be Covered

Key Observation Points (KOPs), consisting of photographs taken from public & private viewpoints, are identified based on the visibility of a project, the number and frequency of views, the potential sensitivity of viewers, and the types of project-related features that would be visible (see Figures 3 & 4, Generalized Viewshed, and Aerial Photograph & KOPs). Locations for KOPs were selected using the following criteria:

- Type of viewers/viewpoint (public views are considered more sensitive than private views) Breadth of the view (views taking in a number of elements rely less on any one element than those focusing on a specific criterion)
- Depth of the view (increased distance from the observed element makes it appear smaller, less detail is registered, and visibility may be affected by atmospheric conditions such as fog, smog, etc.)
- The amount of time (duration) and/or number of times each observer is exposed to the view
- Number of viewers exposed to the view (a greater number of viewers makes the view more sensitive)
- Designated scenic viewpoints and scenic highways are considered sensitive viewpoints.

The Visual Analysis analyzes changes in the visual environment associated with the project from the following general locations: Highway 62 and Miles Square Road.

2.0 Project Description

The Project consists of a 5.24 acre hotel development with access roads that disturbs approximately 1.71 acres (33% of the site). The Project consists of a single-story hotel lobby building with a greeting area, office, guest laundry facility, and mechanical room. The guest rooms will be in separate buildings, consisting of three (3) two-story buildings completing a total of 20 rooms. Additionally there will be a single story spa, single story cafe, single story lounge, single story club room and two single story restaurants. Additional improvements include parking spaces with American with Disabilities Act (ADA) parking spaces, ADA ramps and walkways, native plantings, downward facing lighting, refuse enclosure, on-site drainage improvements, a septic system, and paved access roads. The Project design includes internal private access roads within the described disturbance area, as shown on Figure 4. Internal roadways would connect to existing Twentynine Palms Highway (one access point), and Miles Square Road (one access point). Utility connections would be installed within existing ROW boundaries along Miles Square Road. The site includes Assessor's Parcel Numbers (APNs) 0608-051-04-0000, 0608-051-03-0000 and 0608-051-02-0000 with a split zone of Commercial Neighborhood (CN) and Residential Multifamily (RM) with the entire development proposed being within the CN portion of the parcel and all allowed uses under the CN standards. A parcel map was submitted to merge the 3 CN portions of the parcels into one 5.24 acre parcel leaving 3 remaining RM parcels.

2.1 Location

The project site is located adjacent to HWY 62 along its northern property boundary. The site is also adjacent to Miles Square Road which lies to the west. The project abuts Residential Multi-Family to the south with commercial zoning and development to the west and vacant commercial zoning to the East. Figures 1, 2, and 3, Regional Location Map, Generalized Viewshed Map, and Aerial Photograph & Viewpoint Locations, delineate the project location, generalized viewshed, and immediate surroundings.

2.2 Regulatory Framework

2.2.1 State of California

California adopted a Scenic Highway Program (Streets and Highways Code, Section 260 et seq.) in 1963 to preserve and protect scenic highway corridors from change that would diminish the visual quality of areas that are adjacent to highways. The scenic designation is based on the amount of natural landscape visible by motorists, the scenic quality of the landscape, and the extent to which development intrudes upon the motorist's enjoyment of the view. The Twentynine Palms Highway was designated as a scenic highway in 1986. The designation is intended to help protect the highway's natural and cultural resources and to encourage tourism.

2.2.2 San Bernardino County

2.2.2.1 San Bernardino County General Plan

The San Bernardino County General Plan outlines the county's vision for the future of the area. The plan includes goals for land use, transportation, housing, and other aspects of development. The plan was adopted in 2016 and is updated every five years.

The plan calls for the area Project area to be developed as a mixed-use community with a mix of residential, commercial, and industrial uses. The plan also calls for the development of a new transportation system that includes light rail, bus rapid transit, and bicycle and pedestrian paths. The plan also includes goals for affordable housing, open space, and environmental protection.

The plan provides a roadmap for the future of the area. The plan is used by the county to guide development and to make decisions about land use, transportation, and other aspects of the community.

Here are some of the specific goals for the area:

- To create a mixed-use community with a mix of residential, commercial, and industrial uses.
- To develop a new transportation system that includes light rail, bus rapid transit, and bicycle and pedestrian paths.
- To provide affordable housing.
- To protect open space.
- To protect the environment.

Conservation and Open Space Element

The element is designed to protect and preserve the county's natural resources and open space. The element includes policies on the following topics:

- Identification and protection of sensitive natural resources
- Acquisition and management of open space
- Provision for public access to open space
- Integration of conservation and open space goals into other planning efforts

The Conservation and Open Space Element is an important part of the county's overall planning effort. The element helps to ensure that the county's natural resources are protected and that open space is available for public enjoyment.

The Goals and Policies of this element include the following:

- Policy 10.1.1: The county will identify and protect sensitive natural resources, including wetlands, wildlife habitat, and scenic areas.
- Policy 10.1.2: The county will acquire and manage open space to protect natural resources, provide for public recreation, and buffer development.
- Policy 10.1.3: The county will provide public access to open space through a network of trails and parks.
- Policy 10.1.4: The county will integrate conservation and open space goals into other planning efforts, such as the land use element and the transportation element.

2.2.2.2 Zoning Ordinance

The San Bernardino County Zoning Ordinance provides detailed regulatory provisions for development of all unincorporated lands within the county. County zoning is used to implement the goals and objectives of the adopted General Plan in accordance with state law, which requires that the General Plan and corresponding zoning be consistent with one another. The existing zoning for the project site is Commercial Neighborhood (CN).

2.2.2.3 Grading, Clearing and Watercourses Ordinance

The Ordinance is designed to protect public health, safety, and welfare by preventing erosion, sedimentation, and flooding. The Ordinance also protects natural resources, including wetlands, wildlife habitat, and scenic areas. The Ordinance requires that all grading, clearing, and development activities be conducted in accordance with a grading permit issued by the San Bernardino County Department of Public Works. The San Bernardino County Grading, Clearing and Watercourses Ordinance is a comprehensive set of regulations that govern grading, clearing, and development in unincorporated areas of San Bernardino County. The Ordinance is designed to protect public health, safety, and welfare by preventing erosion, sedimentation, and flooding. The Ordinance also protects natural resources, including wetlands, wildlife habitat, and scenic areas.

2.2.2.4 Light Pollution Code

The San Bernardino County Light Pollution Code is a set of regulations that govern the use of outdoor lighting in unincorporated areas of San Bernardino County, California. The Code is designed to minimize light pollution and to protect the night sky. The Code prohibits the use of certain types of outdoor lighting, such as flashing lights and lights that are too bright. The Code also requires that outdoor lighting be shielded to prevent light trespass. The Code is enforced by the San Bernardino County Department of Public Works.

Specific provisions that apply to the project:

- Outdoor lighting must be shielded to prevent light trespass.
- Outdoor lighting must be turned off at 11:00 p.m., close of business, or when people are no longer present in exterior areas, whichever is later.
- Permanently installed lighting that blinks, flashes or is of high intensity or brightness that causes a light trespass is prohibited.
- All outdoor fixtures need to be fully shielded, installed and maintained in such a manner that the shielding does not permit light trespass in excess of one- tenths foot-candles.

2.2.2.5 Resource Protection Ordinance

The San Bernardino County Resource Protection Ordinance (RPO) was adopted in 1994 and amended in 2007. The RPO is designed to protect the county's natural resources, including wetlands, wildlife habitat, and scenic areas. The ordinance applies to all development projects in the county, regardless of size or location.

The RPO requires that the project obtain a Resource Protection Permit (RPP) before starting development. The RPP process includes an environmental review of the project, which is conducted by the county's Planning Department. The environmental review considers the potential impacts of the project on the county's natural resources.

2.3 Design Policies and Guidelines

The Design Guidelines for Unincorporated San Bernardino County were adopted in 2007 and are designed to promote the development of high-quality, sustainable communities in the county.

- Policy 1.1: Landscaping and open space: The guidelines encourage the use of native plants and trees in landscaping, and the creation of open spaces that provide opportunities for recreation and wildlife habitat.
- Policy 2.1: Streetscapes and public spaces: The guidelines encourage the use of pedestrian-friendly design elements, such as wide sidewalks, street trees, and benches, in streetscapes and public spaces.
- Policy 3.1: Building design: The guidelines encourage the use of energy-efficient building design, such as passive solar design and the use of recycled materials.
- Policy 4.1: Signage: The guidelines encourage the use of clear and concise signage that is compatible with the surrounding environment.
- Policy 5.1: Lighting: The guidelines encourage the use of energy-efficient lighting that minimizes light pollution.
- Policy 6.1: Stormwater management: The guidelines encourage the use of stormwater management practices, such as rain gardens and bioretention swales, to reduce flooding and improve water quality.
- Policy 7.1: Energy efficiency: The guidelines encourage the use of energy-efficient building design and appliances to reduce energy consumption.
- Policy 8.1: Sustainability: The guidelines encourage the use of sustainable materials and practices throughout the development process.

The design policy is intended to promote the development of high-quality, sustainable communities in the county. The policy is a valuable resource for developers, architects, and planners who are working to create communities that are attractive, livable, and environmentally friendly.

3.0 Visual Environment of the Project

This section addresses the existing setting and visual conditions in the area, and includes photographs of the site. This section also includes a discussion of the project viewshed, and the existing visual setting and landforms, and is based on an analysis of photographs, topographic mapping, aerial photographs, reference document reviews, documented on- and off-site land uses, and site reconnaissance.

3.1 Project Setting

The project site is located in the unincorporated area of San Bernardino County, California. The site is approximately 5.24 acres in size and is located off of Highway 62 and Miles Square Road. The site is located on the foothills of the San Bernardino Mountains and has a gently sloping terrain. The site is currently vacant and is covered in native grasses and shrubs. The site is surrounded by single-family homes and commercial development.

The site has good access to major transportation corridors. The site is also served by public water, sewer, and electrical services.

The project setting is favorable for development. The site is located in a desirable location with good access to transportation, utilities, and recreation. Here are the details of the project setting:

- Location: The project site is located in the unincorporated area of San Bernardino County, California. The site is approximately 5.24 acres in size and is located off of Highway 62 and Miles Square Road.
- Topography: The site is gently sloping with an elevation of approximately 1,584 feet above sea level.
- Vegetation: The site is currently vacant and is covered in native grasses and shrubs.
- Hydrology: The site is located in a drainage basin that drains to the Colorado River. The site is not subject to flooding.
- Soil: The soil on the site is sandy and loamy. The soil is well-drained and is suitable for development.
- Air Quality: The air quality in the area is good. The site is located downwind of the major population centers and is not subject to significant air pollution.
- Noise: The noise levels in the area are moderate. The site is located near a major highway and there is some traffic noise.

- Viewshed: The site has good views of the surrounding mountains and desert landscape. The site has views to the north, south, east, and west.
- Access: The site has good access to major transportation corridors. The site is located off of Highway 62 and Miles Square Road.
- Utilities: The site is served by public water, telecom and electrical services.
- Recreation: The site is located near a number of recreational amenities, including hiking trails, fishing lakes, and golf courses.

3.2 Project Viewshed

The Generalized Viewshed exhibit (Figure 2) delineates general areas within which the project is visible (project viewshed) whereby there is no intervening topography between the eye of an observer and the proposed project as determined from an analysis of USGS topographic information. Intervening structures and vegetation observed from analysis of aerial photographs and site visits are taken into consideration when determining a project's specific viewshed. As the photographs of the Project viewshed provided as Figures 5 & 6 demonstrate, the northern viewshed limits are defined roughly by Highway 62 but substantially blocked by foreground vegetation with more distant limits at Pipeline Rd and Copper Mountain. The southern viewshed limits are defined roughly by Baseline Rd but substantially blocked by foreground vegetation with more distant limits defined by the San Bernardino Mountains. The eastern viewshed limits are defined roughly by Copper Mountain Rd but substantially blocked by foreground vegetation. The Western viewshed limits are roughly defined by Miles Square Road but substantially blocked by foreground vegetation. The visual environment surrounding the project is multi-family residential to the south, commercial to the east and west, and industrial to the North. Topographically diverse, the area surrounding the site is varied and ranges from the lower drainages of coyote dry lake to mountains including Copper Mountain and the San Bernardino Mountains.

4.0 Existing Visual Resources and Viewer Response

4.1 Existing Visual Resources

4.1.1 Visual Character

Our understanding or cognition of the visual environment is based on the visual character of objects and the relationships between them. Descriptions of visual character can distinguish at least two levels of attributes: pattern elements and pattern character.

Visual pattern elements include an object's form, line, color, and texture. Our awareness of these pattern elements varies with distance, for example individual details are lost and colors are muted as distances increase.

Pattern character refers to the visual relationships between these elements. Differences in visual character are generally traced to four aspects of pattern character: dominance, scale, diversity, and continuity. For example, there is a great difference between the visual character of Highway 62 to the west where it passes through densely populated areas and to the east where it's surrounded by natural open space, although both may exhibit similar line, color, and texture. The four aspects of pattern character are defined as follows:

- Dominance: Specific components in a landscape may be visually dominant because of position, extent, or contrast of basic pattern elements.
- Scale is the apparent size relationship between a landscape component and its surroundings; an object can be made to look smaller or larger in scale by manipulating its visual pattern elements.
- Visual diversity is a function of the number, variety, and intermixing of visual pattern elements.
- Continuity is the uninterrupted flow of pattern elements in a landscape and the maintenance of visual relationships between immediately connected or related landscape components.

The project and the project setting are assessed according to these attributes; if their visual character is similar, the visual compatibility of the project will be high. If the visual character of the project contrasts strongly with the visual character of its setting, its visual compatibility will generally be low.

4.1.2 Visual Quality

Aesthetics is not only concerned with the character of the visual experience, but also with its quality. The perception of quality is based upon a viewer's response to vividness, intactness, and unity occurring within the visual environment. These factors affect perceptual quality and are defined as follows:

- Vividness is the visual power or memorability of landscape components as they combine in striking and distinctive visual patterns.
- Intactness is the visual integrity of the natural and manufactured landscape and its freedom from encroaching elements.
- Unity is the visual coherence and compositional harmony of the landscape considered as a whole.

Areas with high visual quality are those where all three of these factors are high. Areas with Moderate Visual Quality are those where one of these factors is low. Areas with low visual quality are those where two or more of these factors are low.

4.1.3 Project Site

This area consists of the native grass and shrub mostly flat with a gentle slope to the North. This area is moderately vivid, considered only moderately intact due to the highway that abuts the Northern parcel line. This area is therefore assigned a moderate visual quality rating and considered to be moderately sensitive to change.

4.2 Viewer Response

Viewer response is composed of two elements: viewer sensitivity and viewer exposure. These elements combine to form a method of predicting how the viewers might react to visual changes brought about by a project.

4.2.1 Viewer Sensitivity

Viewer sensitivity varies among the viewer groups described below. A motorist' sensitivity traveling on HWY 62, in the vicinity of the project, will be low to moderate given the design speeds along this corridor, foreground vegetation and dominance of the San Bernardino Mountains that surround the site to the South. Where views toward the project are stationary and broader in view, such as those from elevated neighboring residential areas, viewer sensitivity will be higher due to the heightened awareness of existing visual resources and their characteristics. The sensitivity of recreational users within the project viewshed is anticipated to be low given their slower travel speeds, transitory nature of their views, and their increased awareness of the visual resources and characteristics that surround them.

4.2.2 Viewer Groups

Primary viewer groups exposed to the project consist of motorists, surrounding residents, and recreational users using surrounding trails.

4.2.3 Viewer Exposure

The number of viewers and the duration of view are also important to analyzing impacts. The number of viewers in nearby residences (stationary view), and the duration of their view of a project would be very different from the number of people who see a project from a highway or roadway (moving view). Whether the viewers on the highway are residents of the local community or visitors may also affect their responses to a viewshed.

Viewer exposure is typically assessed by measuring the number of viewers exposed to the resource change, type of viewer activity, duration of their view, speed at which the viewer moves, and position of the viewer. Viewer exposure is described in greater detail in Chapter 5, Visual Impact Assessment.

4.2.4 Viewer Awareness

A viewer's response is also affected by the degree to which he/she is receptive to the visual details, character, and quality of the surrounding landscape. A viewer's ability to perceive the landscape is affected by his/her activity. A viewer on vacation in San Diego County would probably take pleasure in looking at the landscape, and an individual may be strongly attached to the view from his home, but a local County resident commuting to work may not "register"

those same visual resources on a daily basis. Viewer exposure is described in greater detail in Chapter 5, Visual Impact Assessment.

5.0 Visual Impact Assessment

5.1 Methodology

The viewshed is generally the area that is visible from an observer's viewpoint and includes the screening effects of intervening vegetation and/or physical structures. A topographic viewshed analysis was conducted for the project to illustrate the geographic extent of potential views of the project area and to comply with Development Code Section 82.19.040. The topographic viewshed analysis for the project is shown in Exhibit 3. The analysis indicates that the project site may be visible from the surrounding valley areas to the south for up to approximately 5 miles, approximately .75 miles to the east, approximately 1.2 miles to the west, and Approximately .75 miles to the east 1 mile to the South depending on elevation differences and intervening topography. Although some portion of the project site may be visible from a relatively large area, the degree of visibility would depend on distance and view angle. Generally, the project site would be most visible from viewpoints within 1 mile, while site visibility would diminish as distance increases and view angle decreases. Air quality, including dust and other visible particulates, can affect visibility in the area.

5.2 Key Observation Points

Four key observation points (KOPs) were selected as representative vantage points in the landscape that offer motorists, including local residents traveling on area roadways, views of the proposed project. KOPs 1 through 4 are shown on Exhibit 4. Digital photographs were taken from the selected KOP locations to support the discussion on existing visual setting and the analysis of potential visual impacts associated with the proposed project. Photographs of existing conditions were taken in May 2023 using a digital single-lens reflex (DSLR). Photographs from KOPs 1 through 4 are provided below (see Exhibits 5 & 6).

5.3 Visual Change Analysis

The existing view photographs were compared to the architectural drawings to define the degree of visual change and visual impacts of the proposed project. The BLM Visual Resource Management (VRM) System was used to evaluate visual change by comparing the project features with the basic features (i.e., landform, vegetation, and structures) in the existing landscape using the basic design elements of form, line, color, and texture. The BLM VRM System was used to evaluate visual change for the project because the County has not developed or adopted its own visual resource analysis methodology and the VRM System is an

industry standard method for analysis of landscape visual change. The BLM also manages landscapes with similar characteristics to the project site. Visual contrast rating forms (BLM Form 8400-4) were completed for each KOP and are provided in figures 7-10 of the Visual Impact Assessment. The anticipated degree of viewer sensitivity (i.e., low, moderate, or strong) is disclosed for each KOP. Consistent with the BLM's VRM System, factors considered in determining degree of contrast include distance, view angle, view exposure, relative size or scale, and spatial relationships.

EXHIBITS

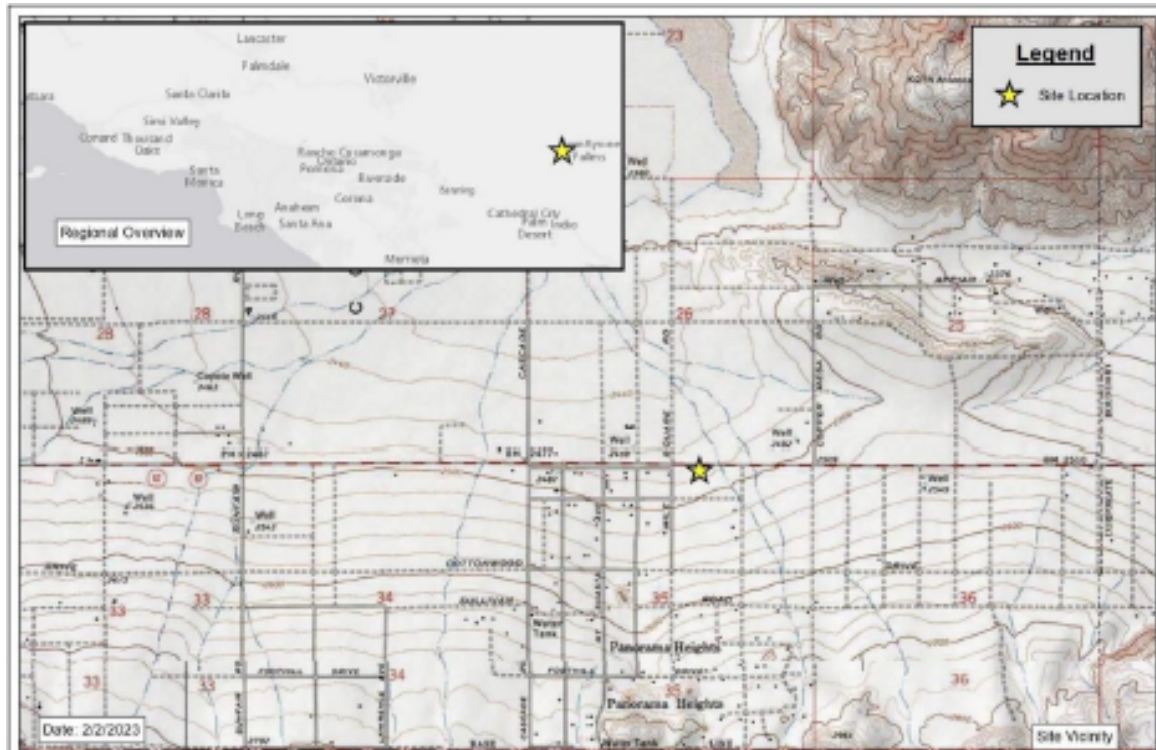
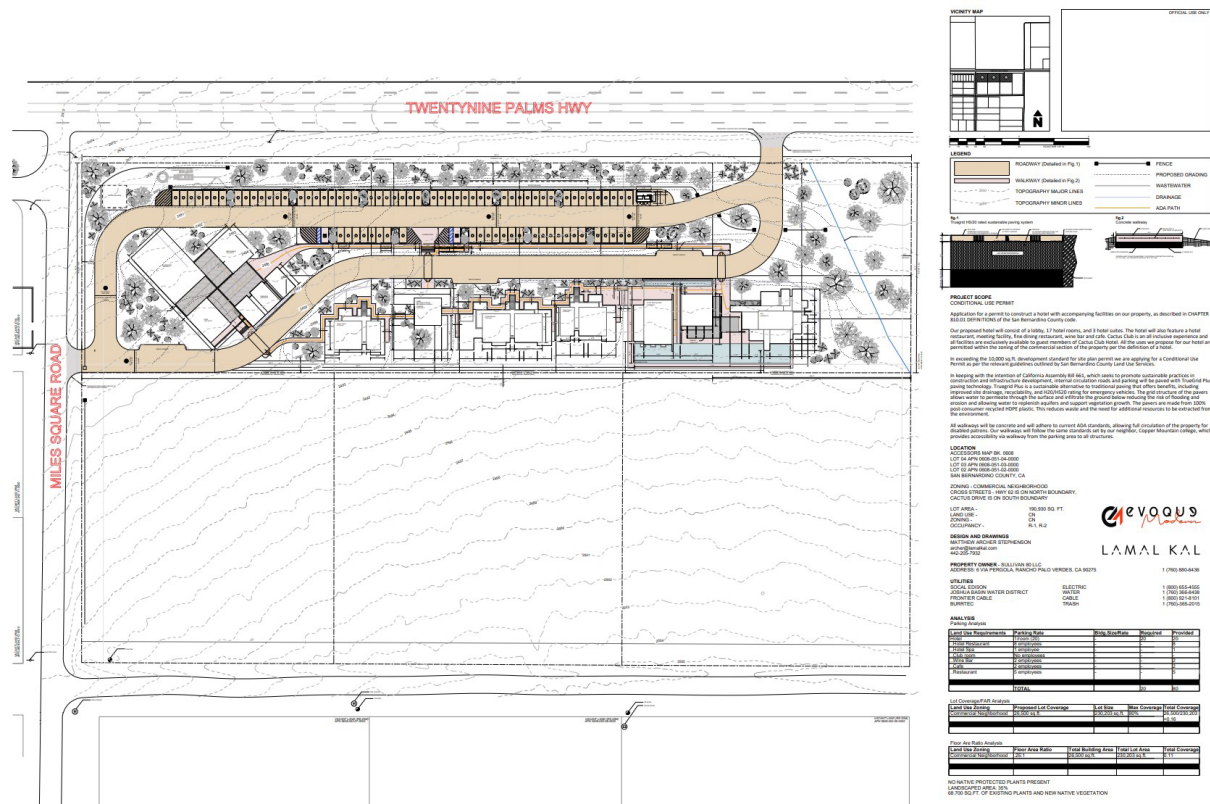


FIGURE 1. REGIONAL LOCATION MAP

FIGURE 2. SITE PLAN



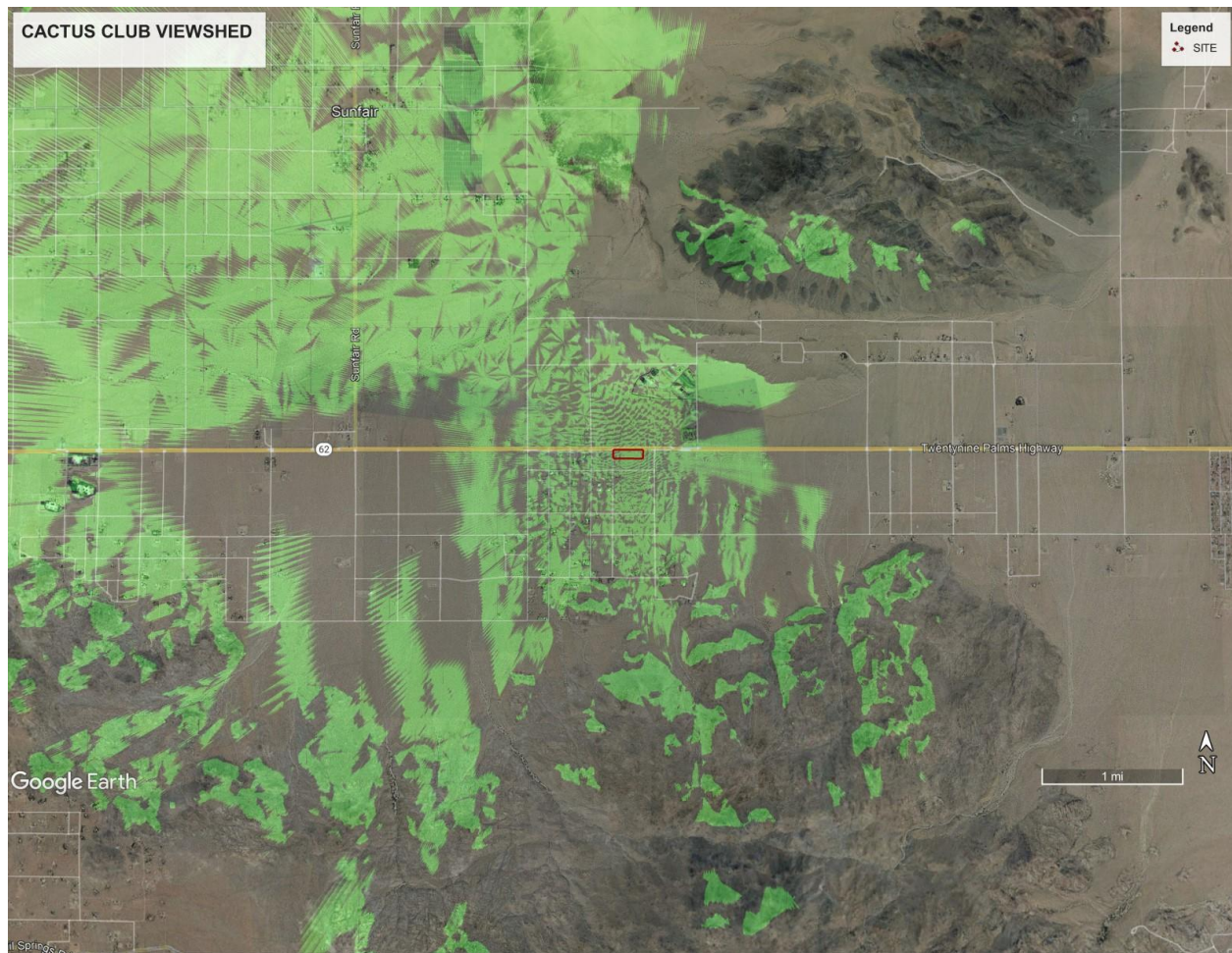


FIGURE 3. VIEWSHED



FIGURE 4. KP POINTS



View of partial viewshed to the North



View of partial viewshed to the South

FIGURE 5 SITE IMAGES



View of partial viewshed to the East



View of partial viewshed to the West

FIGURE 6 SITE IMAGES

Visual Impact Analysis
 PROJ-2023-00061 Evoque Modern
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 May 2023

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Form 8400-4
 (June 2018)

UNITED STATES
 DEPARTMENT OF THE INTERIOR
 BUREAU OF LAND MANAGEMENT
VISUAL CONTRAST RATING WORKSHEET

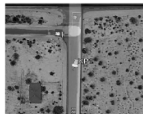
Date: 05/31/2023

District Office: San Bernardino County

Field Office: Joshua Tree

Land Use Planning Area: UNINCORP SBCOUNTY

SECTION A. PROJECT INFORMATION

1. Project Name CACTUS CLUB	4. KOP Location (T.R.S) T 01N, R 07E, S 35	5. Location Sketch 
2. Key Observation Point (KOP) Name KOP1		
3. VRM Class at Project Location CLASS 3	(Lat. Long) 34° 8'4.81"N, 116°13'14.86"W	

SECTION B. CHARACTERISTIC LANDSCAPE DESCRIPTION

	1. LAND/WATER	2. VEGETATION	3. STRUCTURES
FORM	Commercial-undeveloped (foreground), Commercial-undeveloped (mid-ground) Mountainous (background)	Clumped, irregular (foreground) Clumped, irregular (mid-ground)	
LINE	flat, undulating (foreground) flat, undulating (mid-ground) diagonals, undulating (background)	Serrated, irregular (foreground) irregular (mid-ground)	
COLOR	Light tan, beige (foreground) beige, (mid-ground) beige, dark brown (background)	Light and dark green (fore-middle ground)	
TEXTURE	Course to medium (fore-middle ground)	Course (foreground) Medium (mid-ground)	

SECTION C. PROPOSED ACTIVITY DESCRIPTION

	1. LAND/WATER	2. VEGETATION	3. STRUCTURES
FORM	commercial (foreground), commercial (mid-ground) Mountainous (background)	Clumped, irregular; geometric clearings (foreground) Sparse, irregular (mid-ground)	Geometric; horizontal; repeating (foreground) Tall, Solid geometric (mid-ground))
LINE	flat, undulating (foreground) flat, undulating (mid-ground) diagonals, undulating (background)	Serrated, irregular; linear clearing (foreground) irregular (mid-ground)	Simple geometric; staggered horizontal & diagonals; rhythmic (foreground) Geometric, simple, vertical (mid-ground)
COLOR	Light tan, beige (foreground) beige, (mid-ground) beige, dark brown (background)	Light and dark green (fore-middle ground)	Reds, tan, beige, light grey; white (foreground) Brown, grey (mid-ground)
TEXTURE	Course to medium; smooth clearings (fore-middle ground)	Course (foreground) Medium (mid-ground)	Medium, smooth (foreground) Uniform (mid-ground)

SECTION D. CONTRAST RATING SHORT TERM LONG TERM

1. DEGREE OF CONTRAST		FEATURES												2. Does project design meet visual resource management objectives? ☒ Yes ☐ No (Explain on reverses side)
		LAND/WATER BODY (1)				VEGETATION (2)				STRUCTURES (3)				
		STRONG	MODERATE	WEAK	NONE	STRONG	MODERATE	WEAK	NONE	STRONG	MODERATE	WEAK	NONE	
ELEMENTS	FORM		☒			☒					☒			3. Additional mitigating measures recommended ☐ Yes ☒ No (Explain on reverses side)
	LINE		☒			☒						☒		
	COLOR			☒			☒					☒		
	TEXTURE			☒			☒					☒		
													Evaluator's Names Matthew Stephenson	Date 05/30/2023

(Continued on Page 2)

(Form 8400-4)

FIGURE 7 KOP1

Visual Impact Analysis
 PROJ-2023-00061 Evoque Modern
 APN: 0608-051-02, 03, and 04
 May 2023

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Form 8400-4
 (June 2018)

UNITED STATES
 DEPARTMENT OF THE INTERIOR
 BUREAU OF LAND MANAGEMENT
VISUAL CONTRAST RATING WORKSHEET

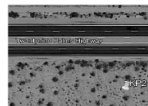
Date: 05/31/2023

District Office: San Bernardino County

Field Office: Joshua Tree

Land Use Planning Area: UNINCORP SBCOUNTY

SECTION A. PROJECT INFORMATION

1. Project Name CACTUS CLUB	4. KOP Location (T.R.S) T 01N, R 07E, S 35	5. Location Sketch 
2. Key Observation Point (KOP) Name KOP2		
3. VRM Class at Project Location CLASS 3	(Lat. Long) 34° 8'5.51"N, 116°13'10.43"W	

SECTION B. CHARACTERISTIC LANDSCAPE DESCRIPTION

	1. LAND/WATER	2. VEGETATION	3. STRUCTURES
FORM	Commercial-undeveloped (foreground), Commercial-undeveloped (mid-ground) Mountainous (background)	Clumped, irregular (foreground) Clumped, irregular (mid-ground)	
LINE	flat, undulating (foreground) flat, undulating (mid-ground) diagonals, undulating (background)	Serrated, irregular (foreground) irregular (mid-ground)	
COLOR	Light tan, beige (foreground) beige, (mid-ground) beige, dark brown (background)	Light and dark green (fore-middle ground)	
TEX- TURE	Course to medium (fore-middle ground)	Course (foreground) Medium (mid-ground)	

SECTION C. PROPOSED ACTIVITY DESCRIPTION

	1. LAND/WATER	2. VEGETATION	3. STRUCTURES
FORM	commercial (foreground), commercial (mid-ground) Mountainous (background)	Clumped, irregular; geometric clearings (foreground) Sparse, irregular (mid-ground)	Geometric; horizontal; repeating (foreground) Tall, Solid geometric (mid-ground))
LINE	flat, undulating (foreground) flat, undulating (mid-ground) diagonals, undulating (background)	Serrated, irregular; linear clearing (foreground) irregular (mid-ground)	Simple geometric; staggered horizontal & diagonals; rhythmic (foreground) Geometric, simple, vertical (mid-ground)
COLOR	Light tan, beige (foreground) beige, (mid-ground) beige, dark brown (background)	Light and dark green (fore-middle ground)	Reds, tan, beige, light grey; white (foreground) Brown, grey (mid-ground)
TEX- TURE	Course to medium; smooth clearings (fore-middle ground)	Course (foreground) Medium (mid-ground)	Medium, smooth (foreground) Uniform (mid-ground)

SECTION D. CONTRAST RATING SHORT TERM LONG TERM

1. DEGREE OF CONTRAST		FEATURES												2. Does project design meet visual resource management objectives? ☒ Yes ☐ No (Explain on reverses side)	
		LAND/WATER BODY (1)				VEGETATION (2)				STRUCTURES (3)					
		STRONG	MODERATE	WEAK	NONE	STRONG	MODERATE	WEAK	NONE	STRONG	MODERATE	WEAK	NONE		
ELEMENTS	FORM		☒			☒					☒				3. Additional mitigating measures recommended ☐ Yes ☒ No (Explain on reverses side)
	LINE		☒			☒						☒			
	COLOR			☒			☒					☒			
	TEXTURE			☒			☒					☒			
Evaluator's Names Matthew Stephenson														Date 05/30/2023	

(Continued on Page 2)

(Form 8400-4)

FIGURE 8 KOP2

Visual Impact Analysis
 PROJ-2023-00061 Evoque Modern
 APN: 0608-051-02, 03, and 04
 May 2023

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 (June 2018)

UNITED STATES
 DEPARTMENT OF THE INTERIOR
 BUREAU OF LAND MANAGEMENT
VISUAL CONTRAST RATING WORKSHEET

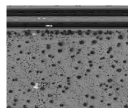
Date: 05/31/2023

District Office: San Bernardino County

Field Office: Joshua Tree

Land Use Planning Area: UNINCORP SBCOUNTY

SECTION A. PROJECT INFORMATION

1. Project Name CACTUS CLUB	4. KOP Location (T.R.S) T 01N, R 07E, S 35	5. Location Sketch 
2. Key Observation Point (KOP) Name KOP3		
3. VRM Class at Project Location CLASS 3	(Lat. Long) 34° 8'4.18"N, 116°13'9.17"W	

SECTION B. CHARACTERISTIC LANDSCAPE DESCRIPTION

	1. LAND/WATER	2. VEGETATION	3. STRUCTURES
FORM	Commercial-undeveloped(foreground), Commercial-undeveloped (mid-ground) Mountainous (background)	Clumped, irregular (foreground) Clumped, irregular (mid-ground)	
LINE	flat, undulating (foreground) flat, undulating (mid-ground) diagonals, undulating (background)	Serrated, irregular (foreground) irregular (mid-ground)	
COLOR	Light tan, beige (foreground) beige, (mid-ground) beige, dark brown (background)	Light and dark green (fore-middle ground)	
TEX- TURE	Course to medium (fore-middle ground)	Course (foreground) Medium (mid-ground)	

SECTION C. PROPOSED ACTIVITY DESCRIPTION

	1. LAND/WATER	2. VEGETATION	3. STRUCTURES
FORM	commercial (foreground), commercial (mid-ground) Mountainous (background)	Clumped, irregular; geometric clearings (foreground) Sparse, irregular (mid-ground)	Geometric; horizontal; repeating (foreground) Tall, Solid geometric (mid-ground))
LINE	flat, undulating (foreground) flat, undulating (mid-ground) diagonals, undulating (background)	Serrated, irregular; linear clearing (foreground) irregular (mid-ground)	Simple geometric; staggered horizontal & diagonals; rhythmic (foreground) Geometric, simple, vertical (mid-ground)
COLOR	Light tan, beige (foreground) beige, (mid-ground) beige, dark brown (background)	Light and dark green (fore-middle ground)	Reds, tan, beige, light grey; white (foreground) Brown, grey (mid-ground)
TEX- TURE	Course to medium; smooth clearings (fore-middle ground)	Course (foreground) Medium (mid-ground)	Medium,smooth (foreground) Uniform (mid-ground)

SECTION D. CONTRAST RATING __SHORT TERM __LONG TERM

1. DEGREE OF CONTRAST		FEATURES												2. Does project design meet visual resource management objectives? ☒ Yes __No (Explain on reverses side)	
		LAND/WATER BODY (1)				VEGETATION (2)				STRUCTURES (3)					
		STRONG	MODERATE	WEAK	NONE	STRONG	MODERATE	WEAK	NONE	STRONG	MODERATE	WEAK	NONE		
ELEMENTS	FORM		☒			☒					☒				3. Additional mitigating measures recommended __Yes ☒ No (Explain on reverses side)
	LINE		☒			☒						☒			
	COLOR			☒			☒					☒			
	TEXTURE			☒			☒					☒			
Evaluator's Names Matthew Stephenson														Date 05/30/2023	

(Continued on Page 2)

(Form 8400-4)

FIGURE 9 KOP3

Visual Impact Analysis
 PROJ-2023-00061 Evoque Modern
 APN: 0608-051-02, 03, and 04
 May 2023

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 (June 2018)

UNITED STATES
 DEPARTMENT OF THE INTERIOR
 BUREAU OF LAND MANAGEMENT
VISUAL CONTRAST RATING WORKSHEET

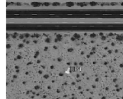
Date: 05/31/2023

District Office: San Bernardino County

Field Office: Joshua Tree

Land Use Planning Area: UNINCORP SBCOUNTY

SECTION A. PROJECT INFORMATION

1. Project Name CACTUS CLUB	4. KOP Location (T,R,S) T 01N, R 07E, S 35	5. Location Sketch 
2. Key Observation Point (KOP) Name KOP4		
3. VRM Class at Project Location CLASS 3	(Lat. Long) 34° 8'4.88"N, 116° 13'5.72"W	

SECTION B. CHARACTERISTIC LANDSCAPE DESCRIPTION

	1. LAND/WATER	2. VEGETATION	3. STRUCTURES
FORM	Commercial-undeveloped(foreground), Commercial-undeveloped (mid-ground) Mountainous (background)	Clumped, irregular (foreground) Clumped, irregular (mid-ground)	
LINE	flat, undulating (foreground) flat, undulating (mid-ground) diagonals, undulating (background)	Serrated, irregular (foreground) irregular (mid-ground)	
COLOR	Light tan, beige (foreground) beige, (mid-ground) beige, dark brown (background)	Light and dark green (fore-middle ground)	
TEX- TURE	Course to medium (fore-middle ground)	Course (foreground) Medium (mid-ground)	

SECTION C. PROPOSED ACTIVITY DESCRIPTION

	1. LAND/WATER	2. VEGETATION	3. STRUCTURES
FORM	commercial (foreground), commercial (mid-ground) Mountainous (background)	Clumped, irregular; geometric clearings (foreground) Sparse, irregular (mid-ground)	Geometric; horizontal; repeating (foreground) Tall, Solid geometric (mid-ground))
LINE	flat, undulating (foreground) flat, undulating (mid-ground) diagonals, undulating (background)	Serrated, irregular; linear clearing (foreground) irregular (mid-ground)	Simple geometric; staggered horizontal & diagonals; rhythmic (foreground) Geometric, simple, vertical (mid-ground)
COLOR	Light tan, beige (foreground) beige, (mid-ground) beige, dark brown (background)	Light and dark green (fore-middle ground)	Reds, tan, beige, light grey; white (foreground) Brown, grey (mid-ground)
TEX- TURE	Course to medium; smooth clearings (fore-middle ground)	Course (foreground) Medium (mid-ground)	Medium,smooth (foreground) Uniform (mid-ground)

SECTION D. CONTRAST RATING __SHORT TERM __LONG TERM

1. DEGREE OF CONTRAST		FEATURES												2. Does project design meet visual resource management objectives? ☒ Yes __No (Explain on reverses side)
		LAND/WATER BODY (1)				VEGETATION (2)				STRUCTURES (3)				
		STRONG	MODERATE	WEAK	NONE	STRONG	MODERATE	WEAK	NONE	STRONG	MODERATE	WEAK	NONE	
ELEMENTS	FORM		☒			☒					☒			3. Additional mitigating measures recommended __Yes ☒ No (Explain on reverses side)
	LINE		☒			☒						☒		
	COLOR			☒			☒					☒		
	TEXTURE			☒			☒					☒		
													Evaluator's Names Matthew Stephenson	Date 05/30/2023

(Continued on Page 2)

(Form 8400-4)

FIGURE 10 KOP4