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## **4. ENVIRONMENTAL IMPACT ANALYSIS**

### **1. AESTHETICS**

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#### **4.1.1 INTRODUCTION**

This section evaluates the potential impacts of the Proposed Project on aesthetics, views and vistas, visual character, and light and glare in the Project area. Aesthetics generally refers to visual resources and the quality of what can be seen, or overall visual perception of the environment, and may include such characteristics as building height and mass, development density and design, building condition (i.e., blight), ambient lighting and illumination, vegetation/landscaping, natural landforms, and open space. Views and vistas refer to visual access and obstruction of prominent visual features, including valued visual landmarks and panoramic vistas. Visual character may be defined by the different elements of natural features such as topography, geologic features, water features, or natural vegetation, or urban features such as land use patterns and density, urban form and design, building mass, and any historic resources within the locale. The analysis of light and glare impacts addresses the effects of nighttime illumination and daytime glare on adjacent land uses.

#### **4.1.2 ENVIRONMENTAL SETTING**

##### **Existing Visual Characteristics and Views**

The existing visual character of the project area is largely defined by a mix of natural and built features within the environment. The natural environment surrounding the Project Site at Lyons Avenue and Railroad Avenue, and the portion of the Project Site at Railroad Avenue and 13<sup>th</sup> Street, is composed of hillsides and ridgelines with diverse topography, open space, the Newhall Creek in the foreground, and scenic mountains and ridgelines in the background. The aesthetic features that characterize the project area includes the rural, equestrian-oriented residential community of Placerita Canyon, located east of the Project Site, and Old Town Newhall, located west of the Project Site, which is primarily developed with commercial retail land uses along Main Street and Lyons Avenue and multi-family and single-family residential uses north and south of Lyons Avenue. The Newhall Library is a prominent public building and architectural feature located on the north side of Lyons Avenue just to the west of the Project Site.

##### **Views of the Project Site**

The Project Site consists of improved roadway segments of Railroad Avenue and Lyons Avenue and undeveloped land with moderate to steep topography to the east extending towards Dockweiler Drive. The most prominent natural feature in the vicinity of Project Site is Newhall Creek and the southern ridgeline of Placerita Canyon. Newhall Creek, which has a north-south orientation within the area of the Project Site, is a prominent natural feature, but is predominately concealed from view by topography, the elevated railroad right of way, and natural vegetation. The east-west trending ridgeline located to the immediate south of the Project Site, which is identified in the City's General Plan as a significant ridgeline, extends from The Master's University upper campus parking lot at its highest point and gradually declines in elevation westward towards the Project Site. The location of the ridgeline relative to

the grading footprint of the proposed roadway alignment is identified in Figure 4.1-1, Significant Ridgelines. Within the confines of the Project Site, the elevation of the ridgeline is 1,280 feet above mean sea level (msl) at the approximate toe of the ridgeline to 1,339 msl at the western limit of the alignment where it connects to The Master's University segment of the future Dockweiler alignment. It should be noted that the eastern segment of the Dockweiler alignment was previously approved under a separate project entitlement for The Master's University in 2009, which included a Ridgeline Alteration Permit for the eastern segment of this ridgeline.<sup>1</sup>

With respect to natural scenic resources, two coast live oaks have been identified within this portion of the Project Site. (See Section 4.3 Biological Resources and Appendix D of this Draft EIR). Native oak trees are recognized as a visual aesthetic and natural resource protected under City of Santa Clarita Oak Tree Ordinance (Ordinance No. 89-10, passed by the City Council on April 25, 1989) and the City's Oak Tree Preservation and Protection Guidelines (adopted September 11, 1990). The City of Santa Clarita requires that all potential impacts to oak trees be preceded by an application to the City that includes a detailed oak tree report and that loss of or damage to protected oaks be mitigated at a minimum 2:1 ratio.

The Project Site is prominently visible from the Old Town Newhall area from Lyons Avenue and along Railroad Avenue (See Views 1 and 2 of Figure 4.1-2) and from several residential properties within Placerita Canyon near Aden Avenue and is intermittently visible from The Master's University, the Metrolink Station, recreation trails, located south and southeast of the Project Site, and from portions of Market Street, south of the Project Site (See Views 3 and 4 of Figure 4.1-2).

Proximately visible at the terminus of Lyons Avenue is an outdoor advertising billboard. (See View 1 in Figure 4.1-2). The billboard signage is approximately 10 feet by 30 feet in area and is mounted on a monopole approximately 20-25 feet above grade. The sign is illuminated during evening hours. The eastern sidewalk along Railroad Avenue is landscaped and separated from the elevated railroad right-of-way easement by a chain link fence (See Figure 4.1-2, View 2).

The Project Site is visible from Market Street to the south and the surface parking lot of the Jan Heidt Metrolink Station. From this vantage, the ridgeline and natural open space vegetation on the east side of Newhall Creek is proximately visible in the background. Views of the Project Site from this vantage point are depicted in Figure 4.2-2, Views 3 and 4.

### **Views of Surrounding Properties**

The Project Site is located immediately southwest of the Placerita Canyon community and east of the Old Town Newhall community. Land uses in the vicinity of the Project Site include commercial and industrial uses to the north fronting 13<sup>th</sup> Street, 12<sup>th</sup> Street, and Arch Street, a landscape nursery to the south east,

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<sup>1</sup> *The Master's College Master Plan Project Master Case No. 04-496: Master Plan 07-001, General Plan Amendment 04-009, Zone Change 04-006, Tentative Tract Map 66503, Conditional Use Permit 04-031, Ridgeline Alteration Permit 07-001, Hillside Review 04-010, Oak Tree Permit 04-050 Environmental Impact Report, SCH No. 2006101171.*



Source: City of Santa Clarita, Planning Department, 2006



View 1: From the north side of Lyons Avenue looking southeast towards the proposed roadway alignment.



View 2: From the west side of Railroad Avenue looking southeast towards the proposed roadway alignment.



View 3: From the north side of Market Street looking northwest towards the proposed roadway alignment (Photo: 2014).



View 4: From the north side of Market Street looking north towards the proposed roadway alignment (Photo 2014).



View 5: From the west side of Railroad Avenue looking east.



Project Site Boundary    # Photograph Locations

Source: Parker Environmental Consultants, 2016



Figure 4.1-2  
Existing Views of the Project Site  
Views 1 through 5



View 6: From Newhall Creek within the proposed alignment looking northwest.



View 7: From Newhall Creek within the proposed alignment looking southeast.



View 8: From the Railroad Avenue at the terminus of Lyons Avenue looking southwest down Lyons Avenue.



View 9: From 13th Street east of the railroad tracks looking west.



View 10: From 13th Street east of the railroad tracks looking north.



Project Site Boundary    # Photograph Locations

Source: Parker Environmental Consultants, 2016



Figure 4.1-3  
Existing Views From the Project Site  
Views 6 through 10

the Newhall Metrolink Station to the south (across Newhall Creek) and the Old Town Newhall Library and commercial uses to the west, across Railroad Avenue. Newhall Creek, which has a north-south orientation within the area of the Project Site, is a prominent natural feature, but is predominately concealed from view by topography, the elevated railroad right of way, and natural vegetation. Views of surrounding land uses from the Project Site are depicted in Figure 4.1-3, Existing Views from the Project Site, Views 6 through 10.

### **Existing Viewsheds**

The existing viewsheds in the project area along Railroad Avenue are defined primarily by commercial land uses in Old Town Newhall, to the west across Railroad Avenue, and background views of the Santa Susana Mountains to the south and west, the San Gabriel Mountains to the southeast and Sierra Pelona Mountains to the north. Viewsheds from the Project Site of the Placerita Canyon residential community and The Master's University are largely blocked by steep undeveloped terrain and a ridgeline to the east and southeast. Viewsheds to the north of the Project Site include relatively flat undeveloped vacant land followed by south-facing hills and ridgelines in the background.

#### *North Facing Views Towards Sierra Pelona Mountains and Ridgelines*

Views facing north of the Project Site, east of the intersection of Railroad Avenue and Lyons Avenue and the at-grade railroad crossing at the intersection of Railroad Avenue and 13<sup>th</sup> Street are characterized by ridgelines and hillsides and the Sierra Pelona Mountains in the background. Views looking north from the Project Site are depicted in Figure 4.1-3, View 9 and 10.

#### *South Facing Views Towards San Gabriel Mountains*

As depicted in Figure 4.1-2, View 2, the San Gabriel Mountains are visible from the Project Site to the southeast. The Metrolink station is also visible from the Project Site. Views looking south from the Project Site are largely blocked by the existing ridgeline to the southeast of the Project Site.

### **West Facing Views Towards Old Town Newhall**

Old Town Newhall is visible from the Project Site at the intersection of Railroad Avenue and Lyons Avenue. Additionally, portions of Old Town Newhall are visible from the southeastern portion of the Project Site as the topography becomes steeper in elevation. As seen in View 8 of Figure 4.1-3, the Old Town Newhall Library and a mix of commercial uses along Lyons Avenue and Railroad Avenue are visible from the Project Site. The Santa Susana Mountains are visible in the background.

### **Existing Light and Glare Conditions**

Sources of nighttime illumination in the project area include streetlights, architectural and security lighting, indoor building illumination (light emanating from the interior of structures which passes through windows), and automobile headlights, which is largely a result of the commercial uses fronting

Railroad Avenue, west of the Project Site. Light and glare from Old Town Newhall is largely blocked from land uses to the east by the steep terrain and hillsides east of Railroad Avenue.

### **Regulatory Setting**

Aesthetics is addressed in various sections of the City of Santa Clarita's General Plan and Municipal Code. Each element of the General Plan contains goals, objectives, and policies to map out the development approach for the City. General aesthetic appearance goals, policies, and objectives are discussed below in the General Plan Conservation and Open Space Element and Municipal Code's Hillside Development Ordinance.

#### **General Plan Conservation and Open Space Element**

The Conservation and Open Space Element establish a framework to ensure preservation of an open space greenbelt around large portions of the Santa Clarita Valley, in addition to preserving water quality, historic and cultural resources, scenic views, and providing recreational facilities to enhance the quality of life for residents. Preservation of scenic and accessible open spaces around the urbanized portions of the Valley, and between neighborhoods and districts, contributes to community character and the distinctive sense of place. The Conservation and Open Space Element includes goals, objectives and policies for the following resources: soils and geological resources; water, including water supply, quality and conservation; biological resources; cultural and historical resources; air quality, energy conservation and climate change; parks, recreation, and trails; and open space conservation.

#### **Hillside Development Ordinance**

Section 17.51.080 of the Santa Clarita Municipal Code establishes the Hillside Development Ordinance in order to regulate the development and alteration of hillside areas, to minimize the adverse effects of hillside development and to provide for the safety and welfare of the citizens of the City of Santa Clarita while allowing for the reasonable development of hillside areas. The Hillside Development Ordinance includes the following objectives:

1. Provide hillside development standards to maximize the positive impacts of site design, grading, landscape architecture and building architecture, and provide development consistent with the goals and policies of the General Plan.
2. Maintain the essential natural characteristics of the area such as major landforms, vegetation and wildlife communities, hydrologic features, scenic qualities and open space that contribute to a sense of place.
3. Retain the integrity of predominant off-site and on-site views in hillside areas in order to maintain the identity, image and environmental quality of the City.

Projects with slopes that average 10% or greater qualify for hillside plan review. As the Proposed Project encompasses slopes of 10% or greater, the Proposed Project is subject to the provisions of this Ordinance.

### **Oak Trees**

The City of Santa Clarita recognizes indigenous oak trees for their significant historical, aesthetic and environmental value. Native oak trees are protected under City of Santa Clarita Oak Tree Ordinance (Ordinance No. 89-10, passed by the City Council on April 25, 1989) and the City's Oak Tree Preservation and Protection Guidelines (adopted September 11, 1990). As discussed in further detail in Section 4.3 Biological Resources, the City of Santa Clarita requires that all potential impacts to oak trees be preceded by an application to the City that includes a detailed oak tree report and that loss of or damage to protected oaks be mitigated at a minimum 2:1 ratio.

Based upon the development and grading footprint of the proposed project as depicted in Figure 2.9, Proposed Site Plan at Lyons Avenue, it has been determined that the 2 oak trees that occur within the project limits would be required to be removed for project construction. The removal of or encroachment to oak trees as a result of project construction would be considered a significant impact under both the City of Santa Clarita and CEQA. Replacement oak trees would be planted in the number necessary to comply with the requirements stipulated in the Oak Tree Permit issued by the City. With approval of the required oak tree permits, and implementation of Mitigation Measure 4.3-7 in Section 4.3, Biological Resources, aesthetic impacts associated with the loss or pruning of any oak tree would be reduced to less than significant levels.

### **Scenic Highways**

The Project Site is bounded by Lyons Avenue and Railroad Avenue to the west, 13<sup>th</sup> Street to north, and the proposed extension of the Dockweiler Drive realignment to the east. None of these roadways are designated as scenic highways. Furthermore, no historic or archaeological resources have been identified within the Project Site (See Section 4.4 Cultural Resources).

### **Beautification Master Plan**

The Santa Clarita Beautification Master Plan contains Citywide design guidelines as well as specific guidelines tailored to maintain the aesthetic character of the communities of Canyon Country, Newhall, Saugus, and Valencia. The Beautification Master Plan addresses concepts for streetscape design, landscape enhancement, gateways, and monumentation and signage, on both a regional and a community scale. The Master Plan strives to maintain the identity of individual communities while unifying the entire City through design. The Beautification Plan identifies a goal of providing landscaped medians within major arterial roadways in order to provide aesthetic appeal, control vehicle circulation, calm traffic, and provide area for directional and traffic signs. The Beautification Plan identifies Lyons Avenue and Railroad Avenue as targeted areas for landscape median enhancement.



### 4.1.3 ENVIRONMENTAL IMPACTS

#### Thresholds of Significance

In accordance with Appendix G to the State CEQA Guidelines, a project would have a significant impact on the environment if it would:

- (a) Result in a substantial adverse effect on a scenic vista; or
- (b) Substantially damages scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway; or
- (c) Substantially degrades the existing visual character or quality of the site and its surroundings; or
- (d) Creates a new source of substantial light or glare which would affect day or nighttime views in the area.

#### Project Impacts

##### Temporary Construction Impacts

Existing views and aesthetic character of the Project Site and surrounding area would be adversely impacted by grading, stockpiles of debris and soil, building materials and construction equipment, all of which could occupy the field of view of passing motorists, pedestrians and nearby residents. Portions of the construction site would be visible from the residential properties on Aden Avenue and from passing motorists on Lyons Avenue, Railroad Avenue, Newhall Avenue, Market and Race Streets, and the Arch Street/12<sup>th</sup> Street/Placerita Canyon intersection. Thus, the existing visual character of the Project Site would be adversely impacted throughout the duration of the construction period. This impact would be considered significant but temporary. Additionally, construction impacts would be reduced to less than significant levels with the implementation of mitigation measure 4.1-1, which would require the contractor to erect screening materials such as fences or other closures to effectively block the line of sight of unsightly stockpiles of construction debris and soil, and construction equipment from neighboring residential properties.

##### Long Term Operational Impacts

Upon completion of the Proposed Project the aesthetic character of the Project Site and its immediate surroundings would be permanently altered. The proposed roadway alignment and associated infrastructure would include street widening for Lyons and Railroad Avenue, new at-grade crossing and a secondary east-west arterial roadway connecting Lyons Avenue to the proposed Dockweiler Drive extension, which would connect Dockweiler Drive to a new five-leg intersection or traffic circle at the Arch Street/12<sup>th</sup> Street/Placerita Canyon intersection. The Proposed Project also includes the closure of the at-grade crossing at the intersection of 13<sup>th</sup> Street and Railroad Avenue.

## Scenic Vistas

### *Roadway Extension at Lyons Avenue and Railroad Avenue*

Views of the intersection at Lyons Avenue and Railroad Avenue will be altered, as the Proposed Project includes street widening and re-profiling the intersection of Lyons Avenue and Railroad Avenue to allow the construction of a new SCRRA/UP railroad at-grade crossing east of Railroad Avenue and the addition of a new bridge crossing Newhall Creek. As illustrated in the visual simulation renderings depicted in Figure 4.1-4, Old Town Newhall, Railroad Avenue & Lyons Avenue Visual Simulation, and Figure 4.1-5, Race Street/5<sup>th</sup> Street Terminus Visual Simulation, views of the intersection of Lyons Avenue and Railroad Avenue and the hillside on the southeast portion of the Project Site will be altered by grading for the proposed roadway alignment.

Views of the Project Site at the intersection of Railroad Avenue and 13<sup>th</sup> Street will also be altered as a result of the closure of the at-grade railroad crossing. The Grading Plan and Grading Plan Profile for the roadway extension from Lyons Avenue are shown in Section 2.0, Project Description, Figures 15 and 16, respectively. Additionally, the proposed street widening of Lyons Avenue is depicted in Figure 2-17 in Section 2.0, Project Description.

The extension of the proposed roadway (Lyons Avenue) is designated as a Secondary Highway in the City of Santa Clarita's General Plan. This designation is also consistent with the approved Master's University Master Plan, in which Dockweiler Drive was re-designated as a 4-lane Secondary Highway. The roadway extension would be developed in accordance with the City's roadway standards and design guidelines to ensure the graded hillsides, medians, and walkways are landscaped in a manner that maintains the visual aesthetic quality and character of the City's roadway infrastructure. A visual simulation of the proposed Dockweiler Drive Extension just south of the proposed intersection of Arch Street, 12<sup>th</sup> Street, Placerita Canyon Road and proposed Dockweiler Drive is depicted in Figure 4.1-6. As shown in Figure 4.1-6, the proposed roadway will be a 2-lane facility with a 13-foot parkway on each side. With respect to scenic vistas within the project vicinity, impacts would be reduced to a less than significant impact with implementation of mitigation measure 4.1-2, which would ensure that the roadway median and contoured slopes along the roadway alignment are attractively landscaped and maintained in accordance with landscape plans to the satisfaction of the City Planning Department.

### *Closure of at-grade crossing at 13<sup>th</sup> Street and Railroad Avenue*

Views of the Project Site at 13<sup>th</sup> Street and Railroad would be improved as the existing traffic signal for a T-intersection operation would be modified so that traffic to and from 13<sup>th</sup> Street to Railroad Avenue is closed and the at-grade crossing would be removed. New striping, signage and landscaping would be provided along 13<sup>th</sup> Street. The railroad crossing closure at 13<sup>th</sup> Street is depicted in Figure 2-10, 13<sup>th</sup> Street Crossing Closure. No adverse impacts with respect to views of or from the Project Site would occur as a result of the at-grade crossing at 13<sup>th</sup> Street.



**BEFORE - LYONS AVENUE LOOKING NORTHEAST**



**AFTER - LYONS AVENUE LOOKING NORTHTEAST**

Source: David Evans & Associates, Inc., May 2017.



**BEFORE - LOOKING NORTH & NORTHEAST**



**AFTER - LOOKING NORTH & NORTHEAST**

Source: David Evans & Associates, Inc., May 2017.



**BEFORE - LOOKING SOUTH**



**AFTER - LOOKING SOUTH**



**ENLARGEMENT - LYONS AVENUE**

Source: David Evans & Associates, Inc., May 2017.

### **Alteration of A Significant Ridgeline**

Construction of the proposed roadway alignment will permanently alter a significant ridgeline as designated in the City of Santa Clarita General Plan. However, as noted above, the eastern segment of the Dockweiler alignment was previously approved under a separate project entitlement for The Master's University in 2009, which included a Ridgeline Alteration Permit for the eastern segment of this ridgeline.<sup>2</sup> As part of the approved entitlements for The Master's College Master Plan in 2008, the extension of Dockweiler Drive east of the Project Site was found to result in the permanent and irreversible grading and re-contouring of the ridgeline. As shown in Figure 4.1-1, the grading limits of the Proposed Project would retain the gradual elevation profile of the base of the ridgeline. Limited views of the altered portion of the ridgeline would be visible from limited points along the public rights-of-way along Market Street and Race Street to the south of the Project Site. (See Figure 4.1-5, Race Street/5<sup>th</sup> Street terminus Visual Simulation.) However, as noted in the visual simulation, much of the alteration of the existing ridgeline is within the Master's University property, which was approved and authorized under a separate entitlement and evaluated in a prior environmental impact report. As a project design feature the grading plan incorporates landform grading practices to blend the manufactured slopes and required drainage benches into the natural topography to the maximum extent feasible. Plant materials will be utilized to protect slopes from slippage and soil erosion and minimize the visual effects of grading and construction on a hillside area. With incorporation of the project design features to develop and improve a new roadway extension that is consistent with the City's roadway design standards, the Proposed Project would result in a less than significant impact with respect to the loss of an aesthetic natural feature.

### **Visual Character**

The roadway portion of the Project Site from Lyons Avenue consists of largely undeveloped land that is surrounded by residential, commercial and industrial development. No buildings or development is proposed on the Project Site that would block existing views or substantially degrade the visual character of the existing site. Upon completion, Dockweiler Drive will be improved as a pedestrian, equestrian and bicycle friendly roadway, providing wide sidewalks, Class II bike lanes on each side, and a multi-purpose trail on the east side. Class II bike routes will provide a striped lane for one-way bike travel and will be marked with signs and pavement striping. Multi-purpose trails are to be unpaved and will be available for equestrian, hiking, and mountain bike use. These project features would increase accessibility to scenic natural resources including the Newhall Creek and surrounding ridgelines and mountains.

Additionally, the closure of the at-grade crossing at 13<sup>th</sup> Street would not create an adverse impact with respect to visual character in the project area. Therefore the Proposed Project would have a less than significant impact with respect to public scenic vistas.

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<sup>2</sup> *Ibid.*

## **Roadway Light and Glare**

Ambient nighttime lighting on the Project Site and in the vicinity is generated by sources that include streetlights, automobile headlights, and indoor/outdoor building lighting. The Project would introduce nighttime lighting to the Project Area, which will include pole-mounted streetlights at intersections, lighted bollards along Dockweiler Drive, flashing safety lighting for the proposed at-grade crossing, and would contribute to additional light and glare from the headlights of vehicles utilizing the roadway. Lighting associated with the Proposed Project uses is not anticipated to substantially impact any surrounding sensitive uses as the street lights would be installed with downward directional fixtures and would not create light trespass onto any adjacent properties. Light emanating from the Proposed Project would be a relatively low-level indirect source of light illuminating the roadway and pedestrian walkways and would not adversely impact other properties in the immediate area. Additionally, the steep terrain and orientation of the southeastern portion of the Project Site at the road extension from Lyons Avenue would shield vehicle headlights, signage lighting and street lights from impacting the residential properties within the Placerita Canyon community to the east and along Market and Race Streets to the west. Overall, the Proposed Project would be expected to slightly increase ambient lighting in the area, but compliance with the design standards and requirements established in the Santa Clarita Municipal Code Section 17.51.050 would mitigate lighting impacts to a less than significant level.

### **4.1.4 CUMULATIVE IMPACTS**

The Proposed Project will involve the grading and re-contouring the lower portion of a significant ridgeline for which a Ridgeline Alteration Permit has already been issued for the eastern segment of Dockweiler Drive, that was approved as part of the City's adopted Circulation Element of the General Plan and the approved land use entitlements under The Master's University Master Plan. While the Proposed Project would involve grading and re-contouring of a significant ridgeline, the Proposed Project is consistent with the General Plan and the previously approved Ridgeline Alteration Permit authorized under The Master's University Master Plan (*Master Case No. 04-496 and associated Ridgeline Alteration Permit 07-001*). Therefore, the Proposed Project would result in a less than significant cumulative aesthetic impact.

### **4.1.5 MITIGATION MEASURES**

The following mitigation measures are recommended to ensure that less-than-significant impacts to visual resources would occur:

- 4.1-1 Construction equipment, debris, and stockpiled equipment shall be visually screened to effectively block the line-of-sight from the ground level of neighboring residential properties. Such barricades or enclosures shall be maintained in appearance throughout the construction period. Graffiti shall be removed immediately upon discovery.

- 4.1-2 The roadway median and contoured slopes along the roadway alignment shall be attractively landscaped and maintained in accordance with landscape plans to the satisfaction of the City Planning Department.

#### **4.1.6 LEVEL OF SIGNIFICANCE AFTER MITIGATION**

The Proposed Project would result in temporary adverse impacts to the aesthetic character of the Project Site and its surroundings during the construction period. Such impacts would be reduced to less than significant levels with the implementation of mitigation measure 4.1-1, above, which would require the contractor to erect screening materials such as fences or other closures to effectively block the line of sight of unsightly stockpiles of construction debris and soil, and construction equipment from neighboring residential properties. With mitigation, temporary aesthetic impacts would be reduced to less than significant levels.

With the incorporation of mitigation measures, impacts upon aesthetics, including scenic vistas and visual character would be less than significant.