

Review Addendum for the Silver Maple Wind Farm Visual Impact Assessment

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Prepared for

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INTRODUCTION

Strum Consulting has submitted to Maine Department of Environmental Protection (DEP) the following primary documents concerning visual impacts from the Silver Maple Wind Project.

- **Visual Impact Assessment Silver Maple Wind Farm** (September 19, 2019). The original visual impact assessment (VIA) did not properly identify scenic resources of state and national significance (SRSNS). In addition, the photography was not to the standard expected for a grid-scale wind energy development.
- **Re: Report on additional photographs for Visual Impact Assessment | Silver Maple Wind Project, Clifton Maine** (April 13, 2020). This memo describes fieldwork to identify viewpoints on SRSNS.
- **Visual Impact Assessment Silver Maple Wind Farm** (May 6, 2020). This is an updated VIA that includes the SRSNS, photosimulations for those with probable visibility, and wireframe simulations for those with possible visibility that will be screened by trees in the immediate foreground.
- **Re: Visual Impact Site Analysis | Silver Maple Wind Project | Clifton, Maine** (May 6, 2020). A memo describing additional information about the field investigation of the SRSNS.
- **Silver Maple Wind Project Visual Impact Addendum** (July 8, 2020). Presents an approach to evaluate scenic value and the significance of scenic impacts to users of SRSNS.

Scenic Quality Consultants has been retained by DEP to provide a technical review of the VIA. Reviews were submitted on January 21, 2020 and May 20, 2020. This review will cover material not previously reviewed.

EVALUATION CRITERIA

The standard established by the Wind Energy Act (WEA) is “whether the development significantly compromises views from a scenic resource of state or national significance such that the development has an unreasonable adverse effect on the scenic character or existing uses related to scenic character of the scenic resource of state or national significance” (35-A MRSA 34-A § 3452.1). It further identifies several criteria that shall be considered when evaluating the scenic impact from wind energy development.

- A. The significance of the potentially affected scenic resource of state or national significance;
- B. The existing character of the surrounding area;
- C. The expectations of the typical viewer;
- D. The expedited wind energy development's purpose and the context of the proposed activity;
- E. The extent, nature and duration of potentially affected public uses of the scenic resource of state or national significance and the potential effect of the generating facilities' presence on the public's continued use and enjoyment of the scenic resource of state or national significance; and

- F. The scope and scale of the potential effect of views of the generating facilities on the scenic resource of state or national significance, including but not limited to issues related to the number and extent of turbines visible from the scenic resource of state or national significance, the distance from the scenic resource of state or national significance and the effect of prominent features of the development on the landscape.

These criteria are further elaborated in Chapter 382 Wind Energy Act Standards. In particular it requires that evidence be submitted for each criteria.

When evaluating potential impacts to scenic character, the Department will take into consideration all relevant evidence, including but not limited to user intercept surveys and/or systematic field observations conducted and recorded using generally accepted professional standards, written public comments submitted by users of the SRSNS or other interested persons, oral statements made at Department public meetings held pursuant to 38 M.R.S. §345-A(5), and sworn testimony at public hearings held pursuant to Chapter 3 of the Department's Rules. (Chapter 382.3)

The importance of evidence is reinforced as each of the WEA evaluation criteria are described, often by listing several types of evidence that would be considered appropriate.

Chapter 382 also establishes the need to consider cumulative impacts.

1. When assessing the cumulative scenic impacts of multiple wind energy developments on a single SRSNS, the Department will take into consideration potential and actual scenic impacts from any wind energy developments that are existing ... Existing or permitted small-scale wind energy developments pursuant to 35-A M.R.S. §3456, ... will also be included in this assessment. The analysis will take into account the full build-out of any such existing, permitted, and proposed wind energy developments, and will consider impacts from any portion of those developments that is or would be within eight miles of any portion of any SRSNS within eight miles of the proposed development under review. (Chapter 382.H)

A VIA was not prepared for Pisgah Mountain Wind, however it would have been assessed against the scenic quality that existed prior to its construction. The VIA prepared for the Silver Mountain Wind project considers the incremental visual impact that will be in addition to the existing visual impact. However, it does not evaluate the cumulative impact of both projects to the baseline condition that existed prior to their construction.

Chapter 382.I describes how to evaluate these ratings to determine whether a project has an unreasonable adverse impact on scenic character.

- (1) **High Value SRSNS.** A Department finding of high or medium scenic impact to an SRSNS with high value will be considered to constitute an unreasonable adverse effect on the scenic character or existing uses related to scenic character of the SRSNS. A Department finding of low scenic impact to an SRSNS with high value will be considered

to not constitute an unreasonable adverse effect on the scenic character or existing uses related to scenic character of the SRSNS.

- (2) **Medium Value SRSNS.** A Department finding of high scenic impact to an SRSNS with medium value will be considered to constitute an unreasonable adverse effect on the scenic character or existing uses related to scenic character of the SRSNS. A finding of medium scenic impact to an SRSNS with medium value will require further evaluation by the Department of the evidence to make a determination as to whether the proposed impact would be unreasonably adverse. A Department finding of low scenic impact to an SRSNS with medium value will be considered to not constitute an unreasonable adverse effect on the scenic character or existing uses related to scenic character of the SRSNS.
- (3) **Low Value SRSNS.** A Department finding of medium or low scenic impact to an SRSNS with low value will be considered to not constitute an unreasonable adverse effect on the scenic character or existing uses related to scenic character of the SRSNS. A Department finding of high scenic impact to an SRSNS with low value will require further evaluation by the Department of the evidence to make a determination as to whether the proposed impact would be unreasonably adverse.

VIA's QUANTITATIVE SCORING SYSTEM

The WEA and Chapter 382 provide a clear list of evaluation criteria that must be evaluated using the available evidence. The VIA provides two useful pieces of information, the visibility maps and the visualizations—photo-realistic simulations and wireframe simulations. However, these need interpretation and support to be considered useful evidence.

The goal of the Silver Maple Wind Project Visual Impact Addendum, dated July 8, 2020, “is to provide a quantitative scaling system to "grade" our visual impacts at the relevant SRSNS.” It is immediately apparent that the document does not evaluate the evaluation criteria mandated by the WEA; nor does it consider the cumulative visual impact of the Pisgah Mountain and Silver Maple Wind projects taken together.

Instead it develops an idiosyncratic approach to describe the scenic value of a resource and the significance of the impact. The two scales do not appear to be grounded in the considerable experience evaluating the scenic impacts from wind energy development in Maine, or the substantial literature researching this topic.

Ignore for a moment whether the metric to evaluate scenic value of a resource is relevant under the WEA. There is no evidence presented in the VIA or Addendum, either quantitative or qualitative to justify assigning a value from this scale. For instance the definitions refer to the distance visitor have traveled to use a SRSNS, but there is no source for such information presented in the VIA.

Similarly, ignore that the metric for the significance of the impact is not grounded in the WEA evaluation criteria. There is no evidence presented in the VIA or Addendum to support the notion that a user of Chemo Pond would find a wind project that occupies 7° of the horizontal field of view could not dominate the view at the simulation viewpoint (it will increase as one moves

down the lake toward the wind projects). Similarly, there is no suggestion about why a the wind project does not dominate Chemo Pond if it is visible from 85 percent of the lake.

After two previous written reviews, several emails and conference calls, the VIA still seems unable to address the evaluation criteria that it is required to address both for incremental visual impact associated with the Silver Maple Wind project, and the cumulative impacts when considered with the Pisgah Mountain Wind project. In addition the VIA is thin on evidence needed to respond to the evaluation criteria.

FIELD INVESTIGATION

Fieldwork was conducted by James Palmer, Jessica Damon and Maria Eggett on July29, 2020. It was a warm summer day with good viewing conditions. Based on the viewshed analysis, photosimulations and field memos, three scenic resources were evaluated in detail:

- Chemo Pond
- Hopkins Pond
- East Eddington Public Hall

The evaluation was made at the Silver Maple Wind photosimulation viewpoints. A field sheet was prepared to consider each discrete attribute of the WEA evaluation criteria as described in Chapter 382 and rated the scenic quality of the baseline, existing and proposed views. Each criterion is rated on the following 7-point scale:

0	1	2	3	4	5	6
Very Low	Low	Medium-Low	Medium	Medium-High	High	Very High

A copy of the field sheet is included as Appendix A, and the photosimulations as Appendix B.

The mean ratings of the Silver Maple Wind project for each of the discrete attributes is given in Table 1 for the three SRSNS.

Table 1. Evaluation Criteria Ratings for Chemo Pond, Hopkins Pond, and East Eddington Public Hall

Rating	Chemo Pond	Hopkins Pond	E. Eddington
A. Significance of SRSNS	3.33	3.33	2.67
B. Existing character	4.33	4.33	1.33
C. Expectations of typical viewer	4.33	4.67	2.00
D. Purpose and context of project ¹	–	–	–
E.1 Extent, nature & duration of uses	4.00	2.50	4.00
E.2 Continued use and enjoyment of SRSNS	4.33	3.00	1.67
F.1 Scope and scale of effect on views	5.00	2.00	3.00
F.2 Number and extent of visible turbines	5.67	2.00	3.00
F.3 Distance from SRSNS	4.33	3.33	3.33
F.4 Effect on landscape	5.33	4.00	2.00
G.1 Nighttime lighting	5.67	5.33	3.00
G.2 Cumulative effects	5.33	4.00	2.50
Visual prominence	5.50	4.67	2.00
Baseline scenic quality	4.33	4.33	2.00
Existing scenic quality	3.33	4.33	2.00
Proposed scenic quality	3.00	3.67	-0.33
Incremental Impact (Proposed – Existing)	-0.33	-0.67	-0.33
Cumulative Impact (Proposed – Baseline)	-1.33	-0.67	-0.33

The mean ratings in Table 1 are color coded as blue for Low (0 to 2), yellow for Medium (2 to 4), and red High (4 to 6). **The overall impact to Chemo Pond is High, to Hopkins Pond Medium-High, and to East Eddington Medium.** The visual prominence ratings are in general agreement with the WEA criteria ratings: from Chemo Pond the turbines will dominate the view, at Hopkins Pond they strongly attract visual attention, but are not dominant, and at East Eddington they may be missed among the utility poles by the casual observer. The change in scenic quality also reflects these ratings. The baseline scenic quality at the Chemo Pond viewpoint is High-Medium (4.33); the Pisgah Mountain Wind project dropped it a full point, and Silver Maple Wind will drop it an additional third of a point. The Pisgah Mountain Wind turbines are not visible from Hopkins Pond, so the baseline and existing scenic quality ratings are the same—High-Medium; the Silver Maple Wind project will drop this rating two-thirds of a point. The baseline and existing scenic quality are both Medium-Low at East Eddington; Silver Maple Wind will drop it a third of a point.

PUBLIC COMMENTS

The Silver Maple Wind project has attracted an unusually large number of public comments. They are overwhelmingly in opposition to the project, and most comment on negative scenic affects from the turbines and aviation warning lights. Many of these comments are structured around a form letter that asks the commenter to indicate which scenic resources they use. The

¹ D. Purpose and Context of Project is not a visible characteristic and was no rated.

heaviest use is of ponds that have a home owners' association (e.g., Hopkins Pond and Mountainy Pond). However, both Burnt Pond and Floods Pond had a significant number of users, which raises the question of whether they should be considered SRSNS.

BURNT POND and FLOODS POND

As defined by the WEA, a SRSNS must be a place "owned by the public or to which the public has a legal right of access" (35-A MRSA 34-A § 3451.9). In general, the public is guaranteed legal access to great ponds:

No person on foot shall be denied access or egress over unimproved land to a great pond except that this provision shall not apply to access or egress over the land of a water company or a water district when the water from the great pond is utilized as a source for public water. (17 MRSA 127 § 3860)

The scenic quality of Burnt Pond and Floods Pond is rated in the Maine's Finest Lakes study as Outstanding. However, these lakes are surrounded by land owned by the Bangor Water District, drawing into question their eligibility to be considered SRSNS under the WEA.

Numerous comments submitted to DEP make it clear that the public is using both Burnt Pond and Floods Pond for low intensity recreation, including scenic enjoyment. It has been verified that people are using these ponds. They provide a relatively tranquil nature experience, because they can only be accessed by foot; the road is gated to motorized access. There is extensive visibility of both wind projects from both ponds, and the severity is expected to be similar to Chemo Pond, expect that they are within 3 miles of the projects.

It is recognized that the Bangor Water District has the right to limit the public's access to Burnt Pond and Floods Pond. However, further investigation indicates that it is common for people to use the ponds for low intensity recreation. It is beyond the scope of this review to make a determination about whether Burnt Pond and Floods Pond should be considered as SRSNS. However, if they are then it is expected that the scenic impact will be similar to Chemo Pond, except that they are even closer.

A POSSIBLE MITIGATION OPPORTUNITY

There are two primary sources of visual impact from wind turbines. The first is visibility of the turbines themselves. The second is from the required Federal Aviation Administration (FAA) aviation warning lights, which are red and flash all together. There are limited options to mitigate the effects of visible turbines other than not use the turbine site. However, the FAA has approved a radar activated system that activates the warning lights only when a low flying airplane approached the wind project. Silver Maple Wind has stated their intention to install the radar activation system if approved by the FAA; Pisgah Mountain Wind does not have radar activation (it was not available at the time) and the warning lights are activated from sundown to sunrise. It is expected that when activated the lights will appear similar to Figure 1.



Figure 1. A time exposure photograph of the Rollins Wind FAA warning lights, which would be flashing when observed in the field. The streaking on Mattanawcook Pond is common and occurs if there is a light breeze to ripple the water.

If Silver Maple is to be permitted, a possible partial mitigation would be to install radar activated FAA aviation warning lights on both Pisgah Mountain and Silver Maple. The logic of this proposal is shown in Table 2 where Xs are used to indicate the level of scenic impact. There was no scenic impact in the baseline condition. However, with the construction of Pisgah Mountain Wind there is a substantial level of impact, both during the day and at night (a total of 6 Xs). With the addition of Silver Maple Wind there will be no change at night, but an incremental scenic impact during the day, as supported by the field investigation (a total of 8 Xs). However, if both projects employ radar activated FAA warning lights, the resulting cumulative impact (5 Xs) may be lower than the existing or proposed scenic impact.

Table 2. Schematic representation of the scenic impact during the day and at night.

Condition	Day	Night	Total Impact
1. Baseline			0
2. Existing	XXX	XXX	6
3. Proposed	XXXXXX	XXX	8
4. Mitigation	XXXXXX		5

This proposed mitigation is based on the assumption that activating the warning lights would be a rare occurrence. This would need to be verified with the FAA and any local military and civilian airports or landing strips.

CONCLUSIONS

The Visual Impact Assessment Silver Maple Wind Farm (May 6, 2020) identifies the significance of Chemo Pond as High (page 8). However, one might assume that all lakes with Significant rather than Outstanding scenic quality means that a SRSNS has medium significance. The field investigation conducted for this review found that the scenic impact to Chemo Pond was unambiguously High.

The instructions in Chapter 382.I about “evaluating whether the development significantly compromises views from an SRSNS such that the development has an unreasonable adverse effect on the scenic character or existing uses related to scenic character of the SRSNS” are unambiguous. A High scenic impact to a SRSNS with High or Medium value “will be considered to constitute an unreasonable adverse effect on the scenic character or existing uses related to scenic character of the SRSNS.”

It is uncertain whether to consider Burnt Pond and Floods Pond as SRSNS. However, the scenic impact can be expected to be similar to Chemo Pond.

The VIA identifies Hopkins Pond as a SRSNS with High value; its scenic value is rated Significant in Maine’s Finest Lakes, so it might be considered to have Medium value. The field investigation determined that the scenic impact was High-Medium, which would indicate that the impact is possibly unreasonable adverse, or may require further evaluation.

If the visual impact from the FAA warning lights on the Pisgah Mountain Wind turbines could be essentially eliminated as a permit condition for the Silver Maple Wind project, then it may be possible that there is a net cumulative impact improvement over the existing condition for Chemo Pond. DEP would need to consider whether this mitigation was sufficient. A professionally conducted survey of affected users might help determine this.

APPENDICES

Appendix A. Scenic Impact Assessment of Wind Energy Generating Facilities

Appendix B. Photosimulations in Used in the Field

Scenic Impact Assessment of Wind Energy Generating Facilities

Location: _____ **Evaluator:** _____ **Date:** _____

Refer to Chapter 382.3 for further guidance in completing these ratings. Each rating requires some sort of supporting evidence. For instance, this could be an assessment document, a study completed for the VIA (e.g., viewshed, intercept survey, etc.), or expert judgment grounded in field observation. The rating may require interpreting the evidence; describe your reasoning and cite support if available. If the interpretation is based on expert opinion, identify credentials or experience to substantiate the expertise.

- Existing scenic quality.** Think of the most scenic view in Maine as having a rating of 6; and the least scenic view in Maine as having a rating of 0. What is the scenic quality of the existing view from the SRSNS? This rating should be made at the viewpoint used for the photosimulation.

0	1	2	3	4	5	6
Very Low	Low	Medium-Low	Medium	Medium-High	High	Very High

- Baseline scenic quality** [*Complete only if an existing wind project is visible.*] Think back to the most and least scenic views in Maine. What is the scenic quality of the view from the SRSNS before any wind energy development? This rating requires an accurate photographic quality visual simulation, and should be made at the simulation viewpoint.

0	1	2	3	4	5	6
Very Low	Low	Medium-Low	Medium	Medium-High	High	Very High

- Significance of the potentially affected SRSNS.** Significance is often identified in the designation. For instance, Great Ponds and Rivers are rated 3 for Significant and 5 for Outstanding or Unique. The nomination form for listed historic sites indicates the level of importance—rated 5 for national, 3 for state and 1 for local. As indicated in Chapter 382, ratings may be increased based on the high scenic quality or protection of the viewshed from the SRSNS. Ratings may be decreased due to degradation of scenic character or incompatible development.

0	1	2	3	4	5	6
Very Low	Low	Medium-Low	Medium	Medium-High	High	Very High

Evidence:

- Existing character of the surrounding area.** What is the existing character and scenic quality of the landscape surrounding the SRSNS? Evidence includes a description of the primary landscape elements' quality—are they harmonious and coherent, or degraded by incompatible elements. Forest management and silviculture activities are not considered incompatible.

0	1	2	3	4	5	6
Very Low	Low	Medium-Low	Medium	Medium-High	High	Very High

Evidence:

- C. **Expectations of the typical viewer.** Do viewers expect high scenic quality views because the SRSNS is known or designated for its scenic quality, or it is known as a place to engage in activities for which scenery plays an important role. Evidence can include user intercept surveys, written public comments, or statements made at public meetings. While of a lower value, evidence may also include field observation.

0 Very Low	1 Low	2 Medium-Low	3 Medium	4 Medium-High	5 High	6 Very High
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Evidence:

- D. **Purpose and the context of the proposed activity.** Considered both the physical and practical situation. Evidence may include the quality of the wind resource compared to other areas, existing transmission lines and roads, existence of other permitted wind development and other mitigation.

0 Very Low	1 Low	2 Medium-Low	3 Medium	4 Medium-High	5 High	6 Very High
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Evidence:

- E.1 **Extent, nature and duration of potentially affected public uses of the SRSNS.** What are the user activities at the SRSNS, how many users are there, and how long might they be exposed to the proposed project? Depending on the SRSNS and activities, low use levels may not decrease the significance of potential impacts. Evidence may include visitation records, user intercept surveys, written public comments, statements made at public meetings, and interviews with SRSNS managers, or tourism-related businesses, recreational clubs or organizations whose purpose or viability is related to the public use and enjoyment of the SRSNS. A higher value is given to evidence from users. While of a lower value, evidence may also include field observation.

0 Very Low	1 Low	2 Medium-Low	3 Medium	4 Medium-High	5 High	6 Very High
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Evidence:

- E.2 **Public's continued use and enjoyment of the SRSNS.** How important is scenery to enjoyment of activities at the SRSNS? Will the potential visual change degrade enjoyment and continued use of the SRSNS? Sources of evidence are the similar to E.1 Extent, nature and duration of public uses.

0	1	2	3	4	5	6
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Very Low	Low	Medium-Low	Medium	Medium-High	High	Very High
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Evidence:

- F.1 **Scope and scale of the potential effect of views of the generating facilities on the SRSNS.** What is the relative and absolute area of the SRSNS with potential visibility? What is the horizontal angle of view occupied by the project at a full range of representative viewpoints within the SRSNS. Evidence is based on an analysis of turbine visibility within the SRSNS and from the representative viewpoints.

0 Very Low	1 Low	2 Medium-Low	3 Medium	4 Medium-High	5 High	6 Very High
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Evidence:

- F.2 **Number and extent of turbines visible from the SRSNS.** How many turbines are visible, what is the extent of each turbine’s visibility (e.g., blade end, turbine hub, rotor sweep),

0 Very Low	1 Low	2 Medium-Low	3 Medium	4 Medium-High	5 High	6 Very High
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Evidence:

- F.3 **Distance from the SRSNS.** There is a rebuttable assumption of high impact to scenic character for areas within 3 miles of visible turbines. Turbines beyond 8 miles not considered. [Distance has been found to be related to the visual prominence of wind energy development projects—this scale may use the levels of visual prominence rating form.]

0 Very Low	1 Low	2 Medium-Low	3 Medium	4 Medium-High	5 High	6 Very High
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Evidence:

- F.4 **Effect of prominent features of the development on the landscape.** Are there landmarks or prominent landscape elements in the view that draw viewer attention? What is the horizontal relationship of these elements and the turbines? What is the importance of the viewpoint for the SRSNS, (e.g., is it an entrance/access point or interpretive site)?

0 Very Low	1 Low	2 Medium-Low	3 Medium	4 Medium-High	5 High	6 Very High
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Evidence:

G.1 **Nighttime lighting.** Take into account the visibility of nighttime lighting (e.g., FAA aviation warning lighting) from the full build-out of any existing, permitted, and proposed wind energy developments, within eight miles of any portion of the SRSNS. Evidence may include field observation and viewshed analysis, as well as sources of evidence are the similar to E.1 Extent, nature and duration of public uses.

0 Very Low	1 Low	2 Medium-Low	3 Medium	4 Medium-High	5 High	6 Very High
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Evidence:

G.2 **Cumulative effects.** What is the potential for the SRSNS to be involved in combined, sequential or successive observation visual impacts as determined by the above criteria?

0 Very Low	1 Low	2 Medium-Low	3 Medium	4 Medium-High	5 High	6 Very High
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Evidence:

3. **Proposed scenic quality.** Think back to the most and least scenic views in Maine. What is the scenic quality of the proposed view from the SRSNS? This rating requires an accurate photographic quality visual simulation, and should be made at the simulation viewpoint.

0 Very Low	1 Low	2 Medium-Low	3 Medium	4 Medium-High	5 High	6 Very High
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VISUAL PROMINENCE LEVELS AND DESCRIPTIONS

Visual Prominence Level Rating	Description
Level 0. Not visible.	Not visible.
Level 1. Visible only after extended, close viewing; otherwise invisible.	Project or its elements near the extreme limit of visibility. It could not be seen by a person who was not aware of it in advance, and looking for it. Even under those circumstances, the object can only be seen after looking in its direction for an extended period of time.
Level 2. Visible when scanning in the general direction of the project; otherwise likely to be missed by casual observers.	Project appears very small and/or faint, but when the observer is scanning the horizon or looking more closely at the project area, it can be detected without extended viewing. It could sometimes be noticed by a casual observer; however, most people would not notice it without some active looking.
Level 3. Visible after a brief glance in the general direction of the project and unlikely to be missed by casual observers.	Easily detected after a brief look and would be visible to most casual observers, but without sufficient size or contrast to compete with major landscape/seascape elements.
Level 4. Plainly visible and could not be missed by casual observer, but does not strongly attract visual attention, or dominate view because of apparent size.	Obvious and with sufficient apparent size or contrast to compete with other seascape/landscape elements, but with insufficient visual contrast and insufficient size to strongly attract visual attention.
Level 5. Strongly attracts visual attention of views in general direction of study subject, but not the most prominent or dominant feature in the view. Attention may be drawn by the strong contrast in form, line, color, or texture, luminance/ reflectivity, or motion.	Contrasts with the surrounding landscape elements so strongly that it is a major focus of visual attention, draws viewer attention immediately and tends to hold viewer attention, but is not prominent enough to dominate the view. In addition to strong contrasts in form, line, color, and texture, luminance (such as reflections) associated with the study subject may contribute substantially to drawing viewer attention. The visual prominence of the project interferes noticeably with views of nearby landscape elements.
Level 6. Dominates view because of structure or facility size (for views in its general direction) and strong contrasts in form, line, color, texture, luminance, or motion.	Creates such strong visual contrasts and is of such large apparent size that it is the major focus of visual attention and dominates the view. The large apparent size is a major factor in its view dominance. In addition to size, contrasts in form, line, color, and texture, luminance/reflectivity, and/or motion associated with the study subject may contribute substantially to drawing viewer attention. The visual prominence of the project detracts noticeably from views of other landscape elements.

Source: Sullivan, R. S. 2020. Argonne National Laboratory.

APPENDIX B

PHOTOSIMULATIONS USED IN THE FIELD

The existing photograph and proposed photosimulations are taken from the **Visual Impact Assessment Silver Maple Wind Farm** (May 6, 2020). The baseline photosimulation was created by editing the existing photograph in Adobe Photoshop to remove the Pisgah Mountain Wind turbines.

- Chemo Pond baseline
- Chemo Pond existing
- Chemo Pond proposed

- Hopkins Pond baseline/existing
- Hopkins Pond proposed

- East Eddington baseline
- East Eddington existing
- East Eddington proposed

APPENDIX B IS IN A SEPARATE DOCUMENT