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| **Docket Number:** | 97-AFC-02C |
| **Project Title:** | Sutter Power Plant Application for Certification |
| **TN #:** | 271756 |
| **Document Title:** | Response to Informal Data Request (Visual Resources) |
| **Description:** | An informal data request was provided via email from John Heiser (CEC) on May 15, 2026 requesting an update on the status of the finalized renderings, photo simulations and visual analysis. This response document includes the Visual Resources Memo (Attachment A). |
| **Filer:** | Joe Aguirre |
| **Organization:** | Jacobs |
| **Submitter Role:** | Applicant Consultant |
| **Submission Date:** | 7/30/2026 4:27:16 PM |
| **Docketed Date:** | 7/30/2026 |

# Response to Informal Data Request (Visual Resources)

*Submitted to*
California Energy Commission

*Prepared by*
Sutter CCUS, LLC

With assistance from
Jacobs

**Sutter Decarbonization Project**
**(97-AFC-02C)**
July, 2026

# Introduction

Attached is Sutter CCUS LLC's[1] (Applicant) response to the California Energy Commission's (CEC) informal data request regarding the *Petition for Post-Certification Modification: Sutter Decarbonization Project* filed for the Sutter Energy Center (97-AFC-02C). This submittal includes an updated Visual Resources Memo.

[1] An indirect, wholly owned subsidiary of Calpine Corporation (Calpine).

# Contents

# 1. Visual Resources

## Background:

An informal data request was provided via email from John Heiser (CEC) on May 15, 2026, and is summarized below.

***Data Request:***

*A1. CEC staff are working on their technical sections and would like to have an update when the finalized renderings, photo simulations and visual analysis will be submitted.*

**Response:**

Please find the updated Visual Resources Memo in **Attachment A**.

# Attachment A. Visual Resources Memo

# Sutter Decarbonization Project – Visual Resources Memo

| | |
|---|---|
| **PREPARED FOR:** | CCFC Sutter Energy, LLC |
| **COPY TO:** | Joe Aguirre/Jacobs |
| **PREPARED BY:** | MariaElena Conserva, Ph.D./Earthview Science |
| **DATE:** | July 15, 2026 |

# Introduction

This memorandum analyzes potential visual resource impacts for the Sutter Decarbonization Project (Project) in Sutter County. CCFC Sutter Energy, LLC (Project Owner) submits this memo as part of the Petition for Modification of the Sutter Energy Center (SEC) License for purposes of implementing the Project, which is being advanced by Sutter CCUS, LLC, an affiliate of the Project Owner. The Project would construct a new carbon capture facility at SEC. A new pipeline and injection wells for $CO_2$ transportation and storage would be constructed offsite. This analysis focuses on the impacts of the carbon capture facility because the pipeline and injection wells have low profiles and will not significantly impact visual resources.

Visual resources are the natural and cultural features of the environment that can be seen and contribute to the public's enjoyment of the environment. Visual resource or aesthetic impacts are generally defined in terms of a project's physical characteristics and potential visibility and the extent that the project's presence would change the visual character and quality of the surrounding environment.

# Affected Environment

## Regional Setting

The SEC is located in the Sacramento Valley in Sutter County, approximately seven miles southwest of Yuba City and three miles west of State Route 99 (SR-99) (see Figure VIS-1). The region is flat and rural in character. The land is primarily dedicated to row crops and orchards. Rural residences, agricultural buildings, and other structures are scattered throughout the area.

The region's most scenic feature is the Sutter Buttes, located approximately nine miles north of the Project site. Sutter Buttes are a unique geological feature in the Sacramento Valley and form an undulating ridgeline in views to the northwest.

The Sutter National Wildlife Refuge (SNWR) is approximately two miles west of the Project site. The SNWR consists of about 2,600 acres between the Sutter and Tisdale Bypass channels that provide wetland habitat for many animals, particularly thousands of wintering ducks and geese. SNWR provides opportunities for wildlife viewing and hunting. Just south of SNWR is the Sutter Bypass Wildlife Area, managed by the State of California.

Figure VIS-1. Project Site

## Project Setting

The Project site is located adjacent to the existing SEC on property owned and maintained by a Calpine affiliate. The SEC is a 550 MW natural gas combined cycle ("NGCC") power plant with two combustion turbine generators, two heat recovery steam generators (HRSGs) with duct burners, and a steam turbine generator. Currently, the most visible elements are two 145-foot exhaust stacks and the approximately 109-foot air-cooled condenser. Conifers up to 40 feet tall line the SEC perimeter. These conifers, as well as other shrubs and trees, block the views of the lower SEC structures from outside the facility.

Farmland surrounds the SEC. The closest residence to the Project site is approximately 800 feet to the northeast along South Township Road. Additional homes are scattered along South Township Road, Pierce Road, Oswald Road, and Best Road in the Project vicinity. Wooden pole electrical distribution lines run along roads in the Project vicinity. A 230 kV line on tubular steel poles runs down Township Road south of the plant.

The proposed pipeline route follows rights of way from existing natural gas pipeline routes where possible and extends from the SEC to the south and southwest along roads, canals, and between agricultural parcels. The pipeline route will cross the Sutter Bypass Wildlife Area to the south of the SNWR. The proposed injection well area is also on agricultural land at the end of the pipeline route.

## Potential Project Visibility

The Project would be visible from locations throughout the surrounding area, as evidenced by the visibility of the current SEC. Because the area is agricultural, few structures block long-distance views. The SEC is distinguishable from a few miles away, but beyond two miles, the SEC generally appears as a relatively small element at the horizon line.

More than 40 residences are within two miles of the Project site to the north, east, and south. These residences have the potential for views of the Project site at varying distances where not blocked by orchards, other trees, or buildings. Three residences along South Township Road are less than half a mile from the Project site. Residences at least half a mile but less than a mile from the Project site include two along South Township Road, three along Pierce Road, and three along Best Road. Several residences are over a mile from the Project site along Township Road, Oswald Road, O'Banion Road, and South George Washington Boulevard. Residents are considered to be highly sensitive to changes in their views.

The Project site would be visible to motorists on nearby portions of South Township Road, Pierce Road, Oswald Road, Best Road, O'Banion Road, and South George Washington Boulevard, where not blocked by orchards or other trees. Oswald Road in the Project vicinity is classified as a rural minor arterial (Sutter County, 2010). The other roads in the Project vicinity are currently unclassified, though South Township Road is projected to become a rural major collector (Sutter County, 2010). Vehicles in the Project vicinity are primarily local traffic. Daily traffic volume on South Township Road in 2010 was 380 vehicles (Sutter County, 2010).

The Project will be visible from the publicly accessible areas in the SNWR, specifically at the road to the checkpoint station (see KOP 2), the parking lot at the south entrance, and one pheasant hunting area north of the parking lot. The Project would also be visible from the Bypass Levee Road on the levee east of the refuge, but this road is outside of the SNWR boundary. However, the Project would not be visible from trails in the SNWR. The part of the SNWR that is open to hiking is in the

floodplain between the Sutter and Tisdale Bypass channels. High levees on either side of the floodplain block views of areas outside the SNWR, as does dense riparian vegetation.

A majority of the proposed pipeline would be underground, would not impact visual resources and will not be addressed further in this document. The proposed injection wells require only small structures that would be visible only in the immediate area and would not have visual impacts. Injection wells will not be addressed further in this document.

## Key Observation Points and Character Photos

Sensitive viewing areas and sensitive receptors[1] in the Project vicinity were identified for this analysis. Representative viewpoints for the sensitive receptors were chosen with California Energy Commission staff. Two representative viewpoints, or key observation points (KOPs), were selected (see Figure VIS-1):

- KOP 1 – the view from the nearest intersection at South Township Road and Pierce Road
- KOP 2 – the view from SNWR

In addition to the KOPs, three character views were chosen to document additional aspects of existing visual conditions in the Project vicinity:

- Character View 1 – View from Sutter National Wildlife Refuge Check Station
- Character View 2 – View from South Township Road and O'Banion
- Character View 3 – View from 7611 South Township Road

Fieldwork was conducted in August 2022 by Earthview Science to photograph the existing condition from each KOP and character view location. A single-lens reflex 35-mm camera with a 50-mm lens was used to shoot the photographs. Subsequent visits to the vicinity of the SEC confirmed that significant changes have not occurred in the intervening years.

## Assessment of Existing Conditions

Assessment of the existing level of scenic quality was made based on professional judgment that considered many factors, including:

- Natural features, including topography, water courses, rock outcrops, and vegetation;
- The positive and negative effects of cultural alterations and built structures on visual quality; and
- Visual composition, including assessing the vividness, intactness, and unity of patterns in the landscape[2].

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[1] Typically, residents and recreationists are considered to be sensitive receptors to changes in the landscape. This is because of the potential effects on their long-term views or enjoyment of a particular landscape.

[2] Vividness is the memorability of the visual impression received from contrasting landscape elements as they combine to form a striking and distinctive visual pattern. Intactness is the integrity of visual order in the natural and human-built landscape, and the extent to which the landscape is free from visual encroachment. Unity is the degree to which the visual resources of the landscape join together to form a coherent, harmonious visual pattern. Unity refers to the compositional harmony or compatibility between landscape elements. (US DOT FHWA 1988)

Scenic quality ratings were assigned to each view according to the rating scale summarized in Table VIS-1. This scale was developed by combining concepts from the U.S. Forest Service and the U.S. Department of Transportation guidance, and a scale created to evaluate visual landscape quality by Buhyoff et al. (1994).

TABLE VIS-1
Landscape Scenic Quality Scale

| Rating | Explanation |
|---|---|
| Outstanding Visual Quality | A rating reserved for landscapes with exceptionally high visual quality. These landscapes are significant nationally or regionally. They usually contain exceptional natural or cultural features that contribute to this rating. They are what we think of as "picture post card" landscapes. People are attracted to these landscapes to view them. |
| High Visual Quality | Landscapes that have high quality scenic value. This may be due to cultural or natural features contained in the landscape or to the arrangement of spaces contained in the landscape that causes the landscape to be visually interesting or a particularly comfortable place for people. These landscapes have high levels of vividness, unity, and intactness. |
| Moderately High Visual Quality | Landscapes that have above average scenic value but are not of high scenic value. The scenic value of these landscapes may be due to built or natural features contained within the landscape, to the arrangement of spaces contained in the landscape, or to the two-dimensional attributes of the landscape. Levels of vividness, unity, and intactness are moderate to high. |
| Moderate Visual Quality | Landscapes that are common or typical landscapes that have average scenic value. They usually lack significant cultural or natural features. Their scenic value is primarily a result of the arrangement of spaces contained in the landscape and the two-dimensional visual attributes of the landscape. Levels of vividness, unity, and intactness are average. |
| Moderately Low Visual Quality | Landscapes that have below average scenic value but not low scenic value. They may contain visually discordant cultural alterations, but these features do not dominate the landscape. They often lack spaces that people will perceive as inviting and provide little interest in terms of two-dimensional visual attributes of the landscape. |
| Low Visual Quality | Landscapes that have below average scenic value. They may contain visually discordant human-induced alterations, and often provide little interest in terms of two-dimensional visual attributes of the landscape. Levels of vividness, unity, and intactness are below average. |

## KOP 1—View from South Township Road at Pierce Road

Figure VIS-2A depicts the view from KOP 1, approximately 0.5 miles north of the Project site. KOP 1 represents views from the nearest intersection and views from residences within approximately 0.5 miles on South Township Road, Pierce Road, and Best Road. As KOP 1 represents potential views from people's homes, the level of visual sensitivity is assumed to be high.

This view is also representative of motorists. Pierce Road and this stretch of South Township Road are currently unclassified roadways in Sutter County and primarily serve local traffic. The number of motorists is low.

KOP 1 has a field in the foreground and the SEC plant in the middleground. The SEC is surrounded by tall conifers that block lower-level structures from view. Only the two 145-foot HRSG stacks and the adjacent air-cooled condenser are visible above the trees. Though these industrial structures are

approximately 0.5 miles from KOP 1, they are clearly visible and prominent parts of the view due to size. The character of the view is both rural and industrial.

Applying the scale presented in Table VIS-1, this view is rated as having a moderately low level of visual quality. The vividness of the image is moderately low because the landscape has low distinctiveness or memorability. The visual intactness and unity of the image are low due to the juxtaposition between rural elements in the foreground and industrial elements in the middleground.

## KOP 2—View near Sutter National Wildlife Refuge Check Station

As the Project is not visible from the SNWR Check Station (see Character Photo 1 below), KOP 2 (Figure VIS-3A) was selected as the closest point to the check station from which the Project site is clearly visible. KOP 2 is on Schlag Road, about 0.25 miles north of the check station entrance and approximately 2.3 miles northwest of the Project site.

This view represents what hunters and SNWR staff would have while driving south along Schlag Road. Because it is near the eastern margin of the SNWR, it also serves as a worst-case view from the SNWR. The character of the view is rural with industrial elements. The view features a grassy field crossed by a lattice steel 500-kV line with trees and a few homes in the distance. The SEC facility is also visible in the distance behind a transmission tower, a relatively small feature at the horizon line. Applying the scale in Table VIS-1, this view is rated as having a moderately low level of visual quality. There are no memorable features thus the level of vividness is low. The elements of the view have no discernable pattern. The transmission lines and industrial facilities in the fore to middleground are visually discordant in an agricultural setting. As such, the level of visual intactness and unity is moderately low.

Figure VIS-2. KOP 1. View from South Township Road at Pierce Road

**A. KOP-1**. Existing view toward the Project site from South Township Road at Pierce Road.

**B. KOP-1**. Simulated view toward the Project site from South Township Road at Pierce Road.

**FIGURE VIS-2**
**KOP 1**
**Sutter Decarbonization Project**

Figure VIS-3. KOP 2. View near Sutter National Wildlife Refuge Check Station

**A. KOP-2**. Existing view near Sutter National Wildlife Refuge Check Station.

**B. KOP-2**. Simulated view near Sutter National Wildlife Refuge Check Station.

**FIGURE VIS-3**
**KOP 2**
**Sutter Decarbonization Project**

## Character Photo 1 – View from Sutter National Wildlife Refuge Check Station

Figure VIS-4. Character Photo 1. View from Sutter National Wildlife Refuge Check Station

Figure VIS-4 features a view toward the Project site from the SNWR check station. This photo illustrates that the Project site and existing SEC facility are not visible from the check station as a result of intervening vegetation and landforms.

## Character Photo 2 – View from South Township Road at O'Banion Road


Figure VIS-5.Character Photo 2. View from South Township Road at O'Banion Road

Figure VIS-5 depicts the view from an intersection approximately 1.75 miles south of the Project site. This view represents views from residences south of the Project site not blocked by orchards and other vegetation. This view is also representative of motorists on both streets.

The view features agricultural fields with Sutter Buttes in the background. The SEC is visible, though a relatively small component of the view, near the horizon line. From this vantage point, the SEC does not occupy the same part of the view as the Sutter Buttes, therefore, does not block the view of the ridgeline.

Though discernable, the HRSG stacks are not very distinct from this distance. However, the air-cooled condenser is clearly visible because of its mass and simple blocky form. Even though they are a minor part of the view, the SEC facilities appear industrial and discordant with the rural surroundings.

### Character Photo 3 – View from 7611 South Township Road

Figure VIS-6.Character Photo 3. View from 7611 South Township Road

Figure VIS-6 depicts the view from the entrance to the residence at 7611 South Township Road, approximately 2.4 miles south of the Project site. From this location on South Township Road, neither the Project site nor the existing SEC facilities are visible because of screening by the orchards on South Township Road.

# Environmental Analysis

## Analysis Procedure

This assessment was conducted by applying the method for evaluating the potential aesthetic effects of power plant projects adopted by the California Energy Commission (CEC) staff and first applied in assessing the impacts of the Roseville Energy Park Project (CEC, 2004).

The assessment of visual effects is conducted by comparing the existing conditions to visual simulations of the completed Project. Jacobs prepared a visual simulation for each KOP using computer modeling techniques to depict the view as it would appear with the Project completed. A combination of computer-aided drafting, GIS, and rendering programs were used to produce the images of the Project facilities that are superimposed on photographs.

## Project Appearance

Project facilities are described in the preliminary Project description. The finishes of major Project equipment would be matched to the SEC finishes to optimize the Project's visual integration into the surrounding environment. The pipeline constructed for the Project would be below ground, with sections for maintenance above ground. These sections would only be visible in the immediate vicinity. A small portion of the injection wells would be visible above ground in the immediate vicinity.

An updated Federal Aviation Administration (FAA) aeronautical study for the project is currently being conducted; however, the initial aeronautical study of the Project and determined the Project would not exceed obstruction standards and would not be a hazard to air navigation provided specific conditions are met, including compliance with Chapters 4, 5, and 15 of FAA Advisory Circular 70/7460-1M Change 1. To comply with FAA Advisory Circular 70/7460-1M Change 1 requirements, the Project would incorporate one of two options:

- Aviation Warning Lights: Flashing and/or steady-burning red lights on the top and midpoint of the new 300-foot absorber tower would be required at night. In addition, medium intensity flashing white obstruction lights would be required during daytime and twilight hours. Refer to Attachment 1 for the FAA aeronautical study determination letter and FAA Advisory Circular 70/7460-1M Change 1.
- Aircraft Detection Lighting System (ADLS): Instead, if approved by FAA, the Project would implement an ADLS. The ADLS would automatically illuminate the aviation warning lights when aircraft are detected at a defined distance from the tower. The lights would be deactivated when aircraft are not detected. It is anticipated that the relatively small ADLS radar detection equipment would be affixed to the proposed absorber tower or existing structures.

Standard operational night lighting would also be required at the new facilities, which would be similar to existing night lighting at the SEC facilities. As required by Condition of Certification (COC) VIS-3, new operational lighting would be designed so that exterior light fixtures are hooded, with lights directed downward or toward the area to be illuminated and so that backscatter to the nighttime sky is minimized. The design of outdoor lighting would be such that the luminescence or light source is shielded to prevent light trespass outside the property. High illumination areas not occupied regularly would be provided with switches or motion detectors to light these areas only when occupied. Further, non-glare fixtures would be specified. To the extent feasible, lighting required for any nighttime construction activities would be directed toward the center of the construction site and shielded to prevent light from straying offsite. Task-specific construction lighting would be used to the extent practical while complying with worker safety regulations. Despite these measures and design features, there may be limited times when the Project site appears brightly lit during construction. These impacts would, however, be temporary.

As required by COC VIS-1, new Project structures, buildings, and tanks visible to the public would be treated with non-reflective colors to blend with the agricultural setting.

Project facilities would operate 24 hours per day, seven days per week. The Project would not emit visible plumes.

# Assessment of Visual Effects

## KOP 1—View from South Township Road at Pierce Road

Figure VIS-2 compares existing conditions with those of the Project. In Figure VIS-2B, the Project has been constructed, and new structures are visible from KOP 1. New facilities include two tower-like structures, the absorber tower and the stripper contactor, and a series of lower structures, including storage tanks and the flue gas duct. At this distance of approximately 0.5 miles, many of the new structures are discernible, but only those that are significantly taller than the perimeter trees stand out. Lower structures blend into the perimeter tree line due to their neutral color. However, both new tower structures are clearly visible. While the new stripper contactor tower is a similar scale to the existing HRSG towers, the new approximately 300-foot absorber tower is substantially taller and wider. From KOP 1, the absorber tower would be the tallest structure. With the new facilities, the balance between rural and industrial elements at KOP 1 shifts toward the industrial side. Intactness, in particular, decreases because the Project introduces substantial new elements that are discordant with the rural setting. The vividness and unity of the view would also diminish, resulting in a decline in visual quality from moderately low to low at KOP 1. However, the change in visual quality from moderately low to low is generally considered a less than significant impact and would not be experienced by many people.

## KOP 2—View from Sutter National Wildlife Refuge Check Station

Figure VIS-3 compares the existing conditions with the Project. In Figure VIS-3B, the Project has been constructed. A few new structures are visible around the existing industrial facility at the horizon line. At a distance of more than 2 miles from the Project site, most of the new structures blend into the existing structures and trees on the horizon because they are similar in scale. The exception is the absorber tower , which is distinct even at this distance due to its height, bulk, and compact form.

After the Project's construction, the existing lattice steel transmission towers in the foreground remain the largest industrial elements in the view. Although the new absorber tower is clearly visible, it is largely visually subordinate to the existing transmission towers and a minor element of the overall scene. From KOP 2, Project structures would slightly diminish intactness, unity, and vividness, creating a negligible change in visual character and quality. Overall, the visual quality would stay moderately low. Since the visual quality would not change, there is no significant impact.

# Impact Significance

Significance criteria for impacts on visual resources were determined through a review of applicable state and local regulations to determine whether there would be any new or substantially more severe significant visual resource impacts than those previously identified and analyzed in the SEC Final Decision. Because of the California Energy Commission's (CEC's) Site Certification Process is pursuant to the Warren-Alquist Act, which is a certified agency program pursuant to the California Environmental Quality Act (CEQA), the following criteria developed from the CEQA Guidelines and the CEQA Checklist were used to evaluate whether the Project would result in any new or substantially more severe significant visual resources impacts than those previously identified and analyzed in the SEC Final Decision.

- Would the project have a substantial adverse effect on a scenic vista?

  The Project would not have a substantial adverse effect on publicly accessible scenic vista points or areas. The SNWR, a place dedicated to wildlife observation and hunting, is over two miles west of the Project site. Due to intervening topography and vegetation, the Project site is not visible from much of SNWR (see character photo 1). Where visible, the Project would be a minor part of the background because of the distance separating it from sensitive viewers (see KOP 2, Figure VIS-3). Though the Project would expand the number of industrial structures visible, and potentially increase the sources of nighttime lighting over the long term, the result would be a negligible change to the character and visual quality of the already impacted landscape. Impacts to scenic vistas would be less than significant.

- Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

  The Project is not visible from a state scenic highway. There are no state scenic highways in Sutter County. No impact to state scenic highways would result from the Project.

- Would the project substantially degrade the site's existing visual character or quality and its surroundings?

  The Project would expand the infrastructure at the SEC facility overall and, in particular, add an absorber tower that is larger and more visible than the current infrastructure as well as the inclusion of FAA required lighting. Because the Project surroundings are flat and agricultural, Project facilities would be visible for up to a few miles. For a few sensitive receptors at close range, the Project would cause daytime visual quality to decrease from moderately low to low due to the new additional industrial infrastructure that is, along with the existing industrial infrastructure, discordant with the rural setting. At a distance of 0.5 miles, both new tower structures are clearly visible (see KOP 1, Figure VIS-2). While the new stripper contactor tower is similar in scale to the existing HRSG stacks, the new absorber tower is taller and wider. With the new facilities, the balance between rural and industrial elements shifts even more toward the industrial side. COC VIS-1 provides for the surface treatment of visible project components with non-reflective colors to reduce daytime impacts to the extent possible.

  Nighttime views in the Project area would also diminish due to the FAA required red aviation warning lighting, which would reduce the quality of nighttime views and draw attention to the tower. However, with VIS-3, it is anticipated that operation of the ADLS would reduce nighttime visual impacts on dark skies because the ADLS would only illuminate the warning lights when aircraft are detected, compared to traditional lighting systems that require continuous illumination of red and/or white, medium-intensity strobe lights. When aircraft warning lights are deactivated, no impacts on dark skies would result.

  With implementation of the ADLS, under VIS-3, nighttime visual impacts on dark skies would be minor and overall visual impacts to character and quality would be less than significant with mitigation.

- Would the project create a new source of substantial light and glare that would adversely affect day or nighttime views in the area?

During operation, lighting would be directed on-site and shielded from public view. Non-glare fixtures, switches, sensors, motion detectors, and timers would be employed (see COC VIS-3). Because the SEC already has nighttime illumination, operational lighting associated with the Project would not substantially change present conditions.

To the extent feasible, lighting required for nighttime construction activities would be directed toward the center of the construction site and shielded to prevent light from straying offsite. Task-specific construction lighting would be used to the extent practical while complying with worker safety regulations. Any increase in nighttime lighting during construction would be temporary.

The Project would not be a source of daytime glare because none of the major Project features would have highly reflective surfaces.

Due to FAA requirements to increase Project visibility to aircraft, the Project would include flashing and/or steady-burning red lights on the top and midpoint of the new approximately 300-foot absorber tower for nighttime use. In addition, medium intensity flashing white obstruction lights would be required during daytime and twilight hours. This would represent a change to the existing nighttime sky conditions, especially for nearby residences since this is a rural area with few lights after dark. The lights atop the new tower may be visible from many residences in surrounding areas and could adversely affect nighttime views. However, under VIS-3, it is anticipated that operation of the ADLS would reduce nighttime visual impacts on dark skies because the ADLS would only illuminate FAA lighting when aircraft are detected, compared to traditional lighting systems that require continuous illumination of red and/or white, medium-intensity strobe lights. When aircraft warning lights are deactivated, no impacts on dark skies would result from FAA lighting. With the Project's implementation of the ADLS, under VIS-3, potential nighttime visual impacts on dark skies would be minor.

## Conformity with LORS

This subsection describes whether the Project would affect SEC's ability to comply with applicable laws, ordinances, regulations, and standards (LORS) relevant to visual resource issues. Because the Project site is in unincorporated Sutter County, the County General Plan and Municipal Code were reviewed (Sutter County 2011; 2021). The Sutter County General Plan provisions relevant to visual resources are listed in Table VIS-2.

The Sutter County Municipal Code designates the Project site as General Industrial (M-2). No provisions were found specific to visual resources that would apply to the Project.

TABLE VIS-2
Conformity with the Sutter County General Plan

| Provision | Conformity? |
|---|---|
| Policy ER 7.1: Scenic Resources. Protect views of Sutter County's unique scenic resources including the Sutter Buttes, wildlife and habitat areas, the Sacramento, Feather, and Bear Rivers, and other significant resources. | Yes. Views in the Project vicinity are wide open so that the Project could be visible up to a few miles. However, the Project would not substantially block views of the Sutter Buttes from any publicly accessible scenic area. |

TABLE VIS-2
Conformity with the Sutter County General Plan

| Provision | Conformity? |
|---|---|
| Policy ER 7.3: Visually Complimentary Development. Require new development adjacent to the County's scenic resources to be sited and designed to visually complement the natural environment, topography, and aesthetic viewsheds. | Yes. The Project would not likely be visible from Sutter Buttes since they are approximately nine miles north of site. If visible, the Project is unlikely to be noticeable as a tiny part of an immense vista. In addition, the Project would be visible from parts of SNWR but would not significantly alter the view (see KOP 2). |
| Policy ER 7.4: New Development. Apply design, development, and landscaping standards to new industrial and commercial developments to ensure a quality visual appearance. Screening of parking, ancillary features, storage yards, and other similar elements shall be required. | Yes. To visually integrate the Project with the adjacent facility and surrounding environment, the Project would implement major equipment finishes matching the SEC finishes. The perimeter landscaping at the Project site that screens lower structures from view would be preserved. |
| Policy ER 7.4: Lighting. Support practices that reduce light pollution and preserve views of the night sky including the design and sighting of light fixtures to minimize glare and light on adjacent properties. | Yes. As discussed above, the Project would implement directed lighting hooded and shielded from public view to minimize glare and light stray. It would use switches, sensors, and timers to reduce light use to the extent possible. If approved by FAA, the project would implement an ADLS which would allow for the deactivation of FAA lighting when no aircraft are detected in the area. |

Source: Sutter County, 2011

## Mitigation Measures

Due to the decrease in visual quality from moderately low to low in nearby areas, resulting from the addition of substantial new industrial elements to the view as well as the installation of red night lights and white daytime lights on top of the new absorber tower, the project could potentially create significant impacts on views.

The following existing COCs applied to the SEC facility via the CEC's Final Decision (97-AFC-2), as modified below, reduce the potential visual impacts associated with the Project to a level of less than significant:

- VIS-1: Prior to first electricity generation, the project owner shall treat the project structures, buildings, and tanks visible to the public in non-reflective colors to blend with the agricultural setting.

  Protocol: The project owner shall submit a treatment plan for the project to the California Energy Commission Compliance Project Manager (CPM) for review and approval. The treatment plan shall include:

  - specification, and 11" x 17" color simulations, of the treatment proposed for use on project structures, including structures treated during manufacture;
  - a detailed schedule for completion of the treatment; and,
  - a procedure to ensure proper treatment maintenance for the life of the project.

  If the CPM notifies the project owner that revisions of the plan are needed before the CPM will approve the plan, the project owner shall submit to the CPM a revised plan.

After approval of the plan by the CPM, the project owner shall implement the plan according to the schedule and shall ensure that the treatment is properly maintained for the life of the project.

For any structures that are treated during manufacture, the project owner shall not specify the treatment of such structures to the vendors until the project owner receives notification of approval of the treatment plan by the CPM.

The project owner shall not perform the final treatment on any structures until the project owner receives notification of approval of the treatment plan from the CPM.

The project owner shall notify the CPM within one week after all precolored structures have been erected and all structures to be treated in the field have been treated and the structures are ready for inspection.

- VIS-3. Prior to first electricity generation, the project owner shall design and install all lighting such that light bulbs and reflectors at the plant level are not visible from public viewing areas and illumination of the vicinity and the nighttime sky is minimized.

  Protocol: The project owner shall develop and submit a lighting plan for the project to the CPM and the Sutter County Community Services Department for review and approval. The lighting plan shall require that:

  - Lighting is designed so that exterior light fixtures are hooded, with lights directed downward or toward the area to be illuminated and so that backscatter to the nighttime sky is minimized. The design of this outdoor lighting shall be such that the luminescence or light source is shielded to prevent light trespass outside the project boundary;
  - High illumination areas not occupied on a continuous basis such as maintenance platforms or the main entrance are provided with switches or motion detectors to light the area only when occupied;
  - The Project will implement an ADLS to automatically illuminate the aviation warning lights when aircraft are detected at a defined distance from the tower. The ADLS automatically deactivates the aviation warning lights when aircraft are not detected.
  - A lighting complaint resolution form (similar in general format to that in Visual Attachment 1, which follows these Conditions) will be used by plant operations, to record all lighting complaints received and document the resolution of those complaints. All records of lighting complaints shall be kept in the on-site compliance file.

  If the CPM notifies the project owner that revisions of the plan are needed before the CPM will approve the plan, the project owner shall prepare and submit to the CPM a revised plan.

  Lighting shall not be installed before the plan is approved. The project owner shall notify the CPM when the lighting has been installed and is ready for inspection.

# References

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