DOCKETED	
Docket Number:	97-AFC-02C
Project Title:	Sutter Power Plant Application for Certification
TN #:	271764
Document Title:	Petition for Post-Certification Modification for Sutter Energy Center (97-AFC-02C)
Description:	Decarbonization Capture Project Staff's Data Request Set 4, A61 through A107
Filer:	Susan Fleming
Organization:	ENergy Commission
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July 31, 2026

Barbara McBride
Calpine Corporation
3003 Oak Road
Walnut Creek, CA 94597

RE: Petition for Post-Certification Modification for Sutter Energy Center (97-AFC-02C) Decarbonization Capture Project Data Request Set 4, A61 through A107

Dear Barbara McBride:

The California Energy Commission (CEC) staff is asking for the information specified in the enclosed Data Requests Set 4 which is necessary for the staff analysis of the Sutter Energy Center (SEC) decarbonization project petition to amend (TN# (250246). The proposed project changes include:

- turbine performance improvements;
- installation of a carbon dioxide (CO_2) capture facility and an approximately 16-mile pipeline; and
- construction of three Class VI injection wells to inject the CO_2 for permanent sequestration in a geological storage location.

Data Requests – Set 4 seek further information in the areas of Air Quality, Land Use, Socioeconomics, Soil and Water Resources, Transportation, and Visual Resources based on the contents of the petition to amend.

To assist CEC staff in timely completing its environmental review CEC staff is requesting responses to the data requests as soon as possible. If you are unable to provide the information requested or need to revise the timeline, please let me know within 10 days of receipt of this letter.

If you have any questions, please email me at John.Heiser@energy.ca.gov.

Sincerely,

John Heiser
Compliance Project Manager
Compliance Monitoring and Enforcement Unit
Safety and Reliability Branch
Siting Transmission and Environmental Protection Division

Enclosure: Data Requests Set 4

Technical Area: Air Quality, Public Health and Greenhouse Gas Emissions

AIR QUALITY

Author: Gerry Bemis

BACKGROUND

Staff reviewed TN 250246 (docketed 5/19/2023), titled Petition for Modification-Sutter Decarbonization Project (SDP, PTA). The petition states that in addition to needing approval from CEC for the proposed facility changes, three carbon dioxide injection wells and the associated underground carbon dioxide pool would need to be approved by US EPA Region 9 (TN 250246, page 1 and pages 5 to 6). The project owner requested joint environmental review by both CEC and applicable federal agencies and requested approvals by June 2024 (PTA page 1) to meet critical construction milestones.

DATA REQUEST

A61. Please update project schedule.

BACKGROUND

The PTA (page 6) states that the upgraded turbine components would lead to an increased firing temperature while lowering NOx emissions relative to emissions from existing equipment, but that the owner is not claiming credit at this time for these reductions (PTA page 7). The PTA (page 7) states that the NOx concentration at the turbine exhaust will decrease to 9 parts per million by volume (ppmvd) at 15 percent oxygen and that CO concentration will decrease to 10 ppmvd. The PTA states that there would be "no change in emissions of criteria pollutants" because of the proposed hardware upgrades (PTA page 7). The PTA states that the modified facility would have two absorber columns at 225 feet above ground level (PTA page 2).

The Sutter Energy Center (SEC) application to the Feather River Air Quality Management District (TN# 250523) states on page 4 that NOx, CO, VOCs and PM would be emitted from the two ION Clean Energy Stacks. Each stack would process up to 51.1 million standard cubic feet (mmscf) of exhaust at a stack exit temperature of 110 degrees Fahrenheit. The application lists emissions before and after the facility modifications in Table 1 (page 4). Table 1 shows before and after modification reductions for NOx and CO, but increases for VOC, SOx and PM2.5/PM10 emissions. However, these increases are below the Feather River AQMD major facility modification thresholds. Table 2 (page 5) indicates that permitted emissions levels do not need to increase (also described on PTA page 6). Table 4 (page 7) indicates that projected actual NOx emissions would be 47.7 tons/year, exceeding the Prevention of Significant Deterioration (PSD) major

modifications threshold of 40 tons/year. However, the project owner used "unused capacity" to adjust annual emissions to below the PSD significance thresholds.

DATA REQUEST

A62. Please explain fully how increasing the firing temperature and upgrading the NOx combustion hardware and "other enhancements" produce a net reduction in NOx emissions, as stated on PTA page 2.

A63. Please verify that the emissions before and after facility modifications are correctly represented as shown in Tables 1 through 4 in the application to Feather River AQMD. Update values as needed to include all emissions from the facility under both routine operations and upset conditions. Include leaks. Also include all pipelines and wellhead injection location(s), as applicable.

A64. Please redo the emissions and significance evaluations using complete facility emissions data.

A65. Since the emissions location (and probably other stack features) will change, please conduct an updated air quality impact assessment using AERMOD to evaluate criteria pollutant impacts due to relocating the exhaust from the existing stacks to the absorber columns.

BACKGROUND

The PTA discusses carbon dioxide injection and well monitoring (beginning on pdf pages 7 and 8 of 376 pdf pages).

PTA pages 5 to 6 discuss CO_2 monitoring activities and state how the facility would:
"…comply with the requirements defined by Title 40 of the Code of Federal Regulations (CFR) Parts 124, 144, 145, Federal Requirements under the UIC program for geological storage and EPA Class VI Documents, to ensure the site operates efficiently and safely. The program includes surface and near surface techniques to evaluate anomalies and detect risky areas; real time tracking of operating conditions in injector and monitoring wells, both surface and downhole; direct reservoir measurement of pressure and temperature in the injection zone and above confining zones; geophysical surveys to image the development of the plume and calibrate the models; surveys and tools to track external and internal mechanical integrity and monitoring of induced seismicity"

Staff need more information to know how the project would comply with federal monitoring requirements.

In addition, CEC staff need additional information extending from the CO_2 capture component to the pipeline and to the wellheads and underground pool of CO_2. The Office of State Fire Marshal finalized emergency CO_2 pipeline regulations, in California Code of Regulations, Title 19, Division 1, Chapter 14, Article 9.

DATA REQUESTS

A66. Please clarify how the project owner plans to meet federal requirements in Title 40 of the Code of Federal Regulations (CFR) Parts 124, 144, 145. Include all CO_2 elements in the federal UIC permit from the wellhead(s) to the CO_2 underground storage reservoir.

A67. Please describe how the project owner's proposed pipeline would comply with the requirements of the Office of State Fire Marshall's emergency CO_2 pipeline regulations as specified in Title 19, Division 1, Chapter 14, Article 9.

A68. Please provide conditions of certification to incorporate all CO_2 pipeline requirements in these regulations.

BACKGROUND

The PTA states on page 8: "*the process used to capture the CO2 will use an amine based solvent. The solvent will be contained in the absorber columns and associated piping. The volume of solvent in the absorber columns will be approximately 350,000 gallons. Secondary containment will be provided to ensure any spills are contained.*"

On page 8, the PTA states that there would be no public health impacts from the proposed changes. Staff did not find any description of the makeup of the amine solution and what would be released to the atmosphere in the event of a leak or spill.

DATA REQUESTS

A69. What are the chemicals that would be in the amine solvent (such as amines, ammonia or aldehydes) that could be emitted into the air during routine operations or from either a leak or a spill?

A70. Please evaluate whether any such constituents are toxic air contaminants (TACs) or odorous compounds and whether potential emissions of these constituents would increase the permitted levels of TACs, odors or volatile organic compounds emissions at the Sutter Energy Center.

A71. Please provide the locations of the nearest sensitive receptors.

A72. If any of the chemicals are TACs, please provide a health risk assessment to demonstrate whether the impacts to public health would be less than significant.

BACKGROUND

The PTA states that the facility owner anticipates an annual capacity factor of 85 percent after the facility returns to operation once the upgrades are completed (TN 250246, page 2). This suggests that SEC would need to run at a steady, near full capacity load point and thus may not have sufficient flexibility to compensate for loss of solar electricity production late in the day.

The facility's capacity factor in recent years has ranged from 13.5% in 2019 to 54.6% in 2022. In early years of operation, the SEC's highest capacity factor was 76.3% in 2002. These values were computed by staff from CEC's Quarterly Fuel and Energy Report (QFER) data. Capacity factor data from US EPA's Emissions & Generation Resource Integrated Database (e-GRID) were also reviewed, and these data indicate a somewhat lower capacity factor.

DATA REQUESTS

A73. What is the basis for stating that the facility could achieve an 85% capacity factor?

A74. Does the facility owner have any off-take agreements with another party that would ensure that this capacity factor could be achieved?

A75. What is the minimum capacity factor that the facility owner could accept?

A76. What is the impact of the carbon capture equipment on flexible operations, including start time, minimum load, ramp rate, full load and shut down time?

BACKGROUND

The PTA states that the combustion turbine upgrade components would reduce (i.e., improve) SEC's heat rate by 245 Btu/kWh (PTA page 7). Staff did not find any discussion of how the overall changes at the site due to the carbon dioxide removal equipment would affect SCE's overall heat rate (not just the combustion turbine).

Staff computed heat rates for the existing SEC facility using QFER data, and the heat rate ranged from 7,494 Btu/kWh in 2022 to 7,578 Btu/kWh in 2024. In an application to Feather River AQMD (TN 250523, on pdf page 86 of 98), the application states that the facility would burn 30,151,200 mmBtu/year of natural gas at a turbine capacity of 550 MW. This computes to a heat rate of 7,349 Btu/kWh.

DATA REQUEST

A77. What is the impact of the overall modifications on the facility's heat rate (i.e., not just the combustion turbine)?

VISUAL RESOURCES--Visible Plume

Author: Gerry Bemis

BACKGROUND

TN#250246 describes how a "water wash" would be used in the direct contact cooler of the CO_2 capture system. Staff need to understand the degree to which any water vapors that might be released as a result of this water wash system could lead to generation of a visible plume.

As stated in the Energy Commission's final decision (Publication Number P800-99-010, dated April 28, 1999), changing the facility from a proposed wet cooling system to a dry cooling system reduced several environmental impacts, including the potential for forming a visible plume. However, this change also reduced the thermal efficiency of the SEC by about 1.5 percent, annual average and up to 5 percent on days with ambient temperatures that would exceed 100 degrees Fahrenheit. Adding carbon capture and storage at SEC will more than fully offset the increased carbon dioxide emissions from increased fuel use associated with this change to dry cooling.

Appendix B, Section (g)(6)(E) of 20 CCR Div. 2, Ch. 5 (Information Requirements for an Application for Certification [AFC] or Small Power Plant Exemption [SPPE]) specifically calls for an assessment of visual impacts of a proposed project if it has a wet cooling tower. However, when Appendix B was written, power plants were not proposed to be built with carbon capture equipment and thus, Appendix B did not include language that would be appropriate to include today with carbon capture equipment now being considered for power plants. Staff need to understand the degree to which this new carbon capture technology could generate visible plumes.

The existing facility does not have a wet cooling tower, and the project owner did not provide a visible plume analysis for this amendment request.

It is unclear whether the dry cooling system of the existing facility would be able to handle any increased cooling demands that may occur due to the upgraded combustion turbine hardware upgrades or due to the new carbon capture equipment.

DATA REQUESTS

A78. Would the proposed combustion turbine upgrades and new carbon capture equipment change the cooling load requirements for the dry cooling system of the existing SEC facility?A79. What would be the effect of any change in cooling demand requirements on the dry cooling system?

A80. Staff need to understand the degree to which this new carbon capture equipment could cause visible plume formation. Would any of the water for the water wash escape the facility into the atmosphere? If so, where are the release points? Please compare the volume of any water wash residue escaping into the atmosphere to that of a wet cooling tower and justify whether or not a visible plume analysis is needed.

A81. If a visible plume analysis is needed, please provide the expected stack exit height, stack diameter, exhaust temperature, moisture content, mass flow, and average molecular weight of the flue gas exiting proposed carbon capture equipment, in tabular form as shown below for a range of ambient conditions (i.e. ambient temperature [cold, average, and hot] and relative humidity) and operating scenarios that can be reasonably expected to occur at the project site location.

Parameters	**Sutter Energy Center Decarbonization Amendment**		
Stack Height (feet)			
Stack Diameter (feet)			
Ambient Temperature			
Relative Humidity			
Operating Condition Scenarios			
Full Load Exhaust Temperature (° F)			
Full Load Exhaust Moisture Content (wt %)			
Full Load Exhaust Flow Rate (1,000 lbs./hr.)			
Full Load Exhaust Average Molecular Weight (lbs./mole)			

A82. Please provide a visible plume analysis of the carbon capture equipment or fully justify why no visible plume analysis was conducted for this amendment request.

LAND USE

Author: Jeanine Hinde

BACKGROUND

The petition states that the existing SEC is situated on an approximately 40-acre parcel with assessor's parcel number (APN) 21-230-037 and that the carbon capture facility would be constructed on the site of the decommissioned Greenleaf 1 facility. In response to staff's biological resources data request (TN 263221), it is stated that the perimeter fence line for the decommissioned Greenleaf 1 facility (where the carbon capture facility would be constructed) is outlined in the *Biological Resources Technical Memorandum Special-Status Species Habitat Assessment* (TN 257582). However, staff cannot locate any image in the memorandum showing the referenced fence line.

Online parcel data for Sutter County shows two parcels in the rectangular area labeled as the Sutter Energy Center in the application. Based on the parcel data, the existing SEC is located on APN 21-230-038 (parcel covering approximately 38 acres). The Greenleaf 1 facility is on APN 21-230-037 (parcel covering approximately 39 acres). Also, in a response to staff's soil and water data request (TN 259750), it is stated that the proposed carbon capture facility would cover approximately 12 acres.

The petition includes one image with a rendering of the project (Figure 1). It is an oblique view of most of the area within those two parcels. Figure 1 shows several structures but does not distinguish between those that are existing, proposed, or other structures that could potentially be demolished or replaced. It is also not clear from Figure 1 whether the proposed carbon capture facility would be constructed on portions of both parcels.

The petition states that construction parking would be on the "neighboring parcel located next to the facility." In a response to staff's biological resources data requests (TN 262906), it is stated that construction laydown for the facility would be on the property directly north of the SEC on land controlled by the project owner. Online parcel data shows an approximately 134-acre parcel with APN 21-230-019 directly north of the SEC site. The petition does not estimate the acreage required for construction laydown and parking.

DATA REQUESTS

A83. Please clarify the parcel(s) where the proposed carbon capture facility would be constructed. Please confirm or update the approximate acreage of the facility.

A84. Please provide a plan view drawing showing the existing SEC power plant, structures proposed for the carbon capture facility, and other existing structures that would be retained and reused or demolished. Please label these structures and include the fence line distinguishing the area for the carbon capture facility.

A85. Please provide the approximate acreage required for construction laydown and parking and the portion of APN 21-230-019 where those uses would be sited.

BACKGROUND

The petition states that the carbon capture facility would include a direct contact cooler, two absorber columns up to 225 feet tall, a stripper, pumps, a wet sac cooling unit, chemical delivery tanks, various heat exchangers, and a solvent management system. It is also stated in the petition's land use analysis that one valve and one meter are proposed at the existing SEC.

DATA REQUEST

A86. Please provide other estimated dimensions, including length, width, and height of the structures listed above and any other major structures that are not included in the list. These structures are to be identified in the plan view drawing requested above.

BACKGROUND

The land use analysis in the petition discusses development standards (subsection 1.3), stating that the Sutter County Board of Supervisors established criteria for development of the SEC in Ordinance No. 1278 and that "coordination between the developer and the Sutter County Planning Department would be required to confirm the applicable development standards for the project." A mitigation measure is recommended in the land use analysis to require the project developer to coordinate with Sutter County prior to final project design to confirm and apply the applicable local development standards to the project. The petition does not provide information on applicable development standards and how the project will meet those standards. CEC staff requires this information to perform an analysis of the project's compliance with applicable plans, policies, and regulations. (Staff also notes that the mitigation measure is unconnected to

any project plans or design parameters, and it is inconsistent with the CEQA requirement to avoid deferring mitigation.)

It is also stated that the original SEC was permitted by Sutter County via Use Permit No. 1392. However, the CEC's certificate is in lieu of any permit that would normally be required by the local land use authority. Accordingly, the CEC permitted and licensed the Sutter Power Plant Project in 1999. (CEC staff is unsure if this permit might apply instead to Greenleaf 1, which was not licensed by the CEC.)

The land use analysis includes a "Table 1: General Plan Goals and Policies" with a reference to Policy LU 1.6 on buffers for development adjacent to agricultural and open space land. Under "project compatibility," it states that the project is "subject to Development Standards and Agricultural Buffers established in the Zoning Code (refer to Table 1 of this document)." CEC staff is unable to locate the referenced table in the application with information on development standards and the zoning code.

The pipeline to transport carbon dioxide (CO_2) would extend southwest from the SEC for approximately 16 miles. The land use analysis states that a 30-foot right-of-way (ROW) would constrain development at the surface above the proposed underground pipeline, and that the pipeline would be adjacent to SEC's existing natural gas pipeline where feasible.

DATA REQUESTS

A87. Please provide a copy of Sutter County Ordinance No. 1278.

A88. Please explain the applicability and purpose of Use Permit No. 1392.

A89. Please provide information on how the proposed project would meet Sutter County's applicable development standards.

A90. Please provide the table addressing Development Standards and Agricultural Buffers established in the Zoning Code, including assessments of project consistency with specific Zoning Code requirements. Include an assessment of the CO_2 pipeline's consistency with the Zoning Code.

A91. Please provide a map showing the SEC's existing natural gas pipeline alignment and ROW area.

BACKGROUND

The land use analysis in the application includes a paragraph on the Federal Aviation Administration (FAA),Code of Federal Regulations, Title 14, Part 77.9

pertaining to the requirement to notify the FAA so that an aeronautical study can be conducted (Subsection 2. Regulatory Setting). As stated in the petition, the FAA's objective is to ensure that proposed structures do not impact the safety of air navigation and the efficient use of navigable airspace by aircraft. However, no analysis of the applicability of these regulations to the project is included in the land use analysis.

DATA REQUEST

A92. Please provide an analysis of the applicability of the FAA regulations to the project. Include information on whether the project owner is required to prepare and submit a Part 77 notice to the FAA, Form 7460-1 Notice of Proposed Construction or Alteration. Please provide information documenting consultation (ongoing or anticipated) with the FAA on required notifications, including completion and submittal of Form 7460-1. Also, please include information on the potential need to illuminate certain structures to comply with the FAA's Obstruction Marking and Lighting standards.

BACKGROUND

The land use analysis in the application includes a paragraph on the California Land Conservation Act (Williamson Act). However, no information is included on whether Williamson Act contracted land is present in areas that could be affected by project construction.

DATA REQUEST

A93. Please provide an assessment of Williamson Act lands in the project area including linears. If any such contracted lands are present in areas that could be temporarily or permanently affected by project construction, please identify whether a conflict could occur and how conformance with the Williamson Act would be achieved.

SOCIOECONOMICS/POPULATION AND HOUSING

Author: Ellen LeFevre

BACKGROUND

The petition does not include information on the construction workforce for the Sutter Decarbonization Project. Staff requests the following information.

DATA REQUESTS

A94. Provide the estimated number of construction workers per month during peak activities and the average number of workers per month needed for project construction.

A95. What geographic area(s) would construction workers be drawn from? What would be the estimated percentage of local and non-local construction workforce?

A96. Staff needs information on the occupational trades required for project construction. Provide a table with the occupational trades and the number of workers needed for each month during construction.

SOIL AND WATER RESOURCES

Author: James Ackerman

BACKGROUND: Monitoring Well Configuration

Provided in the response to data request set 1, A8 (TN259750) was Figure 3 that depicts the locations of underground injection control (UIC) Class VI wells (CCS-1 through CC3-3), and Monitoring wells ACZ-1 and ACZ-2R (presumably referring to above confining zone) and SLR-1 through SLR-5 (presumably referring to supercritical liquid reservoir), and the stratigraphic test well. However, Figure 1 of the Aquatic Resources Delineation Report included in the response to data request set 2 (TN263221) show different locations for the proposed wells.

DATA REQUEST

A97. Please provide a map that portrays the most current locations of proposed injection, monitoring, and test wells.

BACKGROUND: On-Site Stormwater Retention Capacity

Per COC **SOIL & WATER-6,** stormwater runoff is retained on-site during project operations. The PTA application does not explain how the proposed carbon capture facility will impact the current stormwater retention system.

DATA REQUEST

A98. Please explain if the current stormwater retention system can accommodate the stormwater runoff from the proposed carbon capture facility, and if not, what additional stormwater retention features will be incorporated.

TRANSPORTATION

Authors: Andrea Koch and Jeanine Hinde

BACKGROUND

Senate Bill (SB) 743, enacted in 2013, added Section 21099 to the Public Resources Code, fundamentally changing how transportation impacts are analyzed under CEQA. SB 743 required the former Governor's Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to level of service (LOS) as the metric for evaluating transportation and traffic-related impacts. Under the revised transportation guidelines, LOS (or vehicle delay) can no longer be considered a significant environmental impact under CEQA. Amendments to the CEQA Guidelines required under SB 743 were approved on December 28, 2018, identifying vehicle miles traveled (VMT) as the "most appropriate measure of transportation impacts" under CEQA, effective July 1, 2020 (Cal. Code Regs., tit. 14, § 15064.3).

The CEQA guidelines are not specific on whether to include or exclude construction traffic, and the issue has not been specifically cited in any legal opinions. However, the California Air Resources Board (CARB) released the Final Environmental Assessment (EA) on its Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target (Scoping Plan). In its programmatic analysis of impacts relating to transportation and traffic, it was concluded that construction activities would result in short-term construction traffic (primarily motorized) from worker commute and materials delivery trips. "Project specific impacts and mitigation would be identified during the environmental review by agencies with project-approval authority" (CARB 2017). This suggests that analyzing construction-related impacts on transportation is of interest to the state. Given that the traffic generated by the project would occur primarily during construction, CEC staff concludes it is appropriate to examine the VMT during construction.

Section 15064.3, subdivision (a), of the CEQA Guidelines states, "For the purposes of this section, 'vehicle miles traveled' refers to the amount and distance of automobile travel attributable to a project." In the OPR Technical Advisory, vehicle types are discussed, stating: "Here, the term 'automobile' refers to on-road passenger vehicles, specifically cars and light trucks" (OPR 2018). Based on the above considerations, the VMT analysis should evaluate worker, not truck, trips to and from the site during the construction phase.

DATA REQUESTS

A99. Please provide the average daily VMT for car and light truck traffic that would be generated by construction.

A100. Please provide information on the anticipated length of the construction period broken out into phases.

A101. Please provide the estimated number of average daily one-way trips that would be generated by each construction phase.

A102. Please provide details on construction work schedules, including days and hours during the AM and PM peak periods.

BACKGROUND

The operations of roadway facilities are described with the term "level of service" (LOS). LOS is a qualitative description of traffic flow from a vehicle driver's perspective based on factors such as speed, travel time, delay, and freedom to maneuver. Six levels of service are defined, ranging from LOS A (free-flow conditions) to LOS F (over-capacity conditions). LOS E corresponds to operations "at capacity." When volumes exceed capacity, stop-and-go conditions result, and the results are designated as LOS F.

Although automobile delay, as measured by LOS, no longer constitutes a significant environmental effect under CEQA, Sutter County has a policy concerning LOS on county roads to ensure that proposed developments are consistent with the County's General Plan:

Policy M 2.5 Level of Service on County Roads. Develop and manage the county roadway segments and intersections to maintain LOS D or better during peak hour, and LOS C or better at all other times (Sutter County 2011).

DATA REQUEST

A103. Please provide details on how consistency with Sutter County's LOS policy would be achieved.

BACKGROUND

The applicant's petition includes one brief paragraph on Traffic and Transportation. It states that a "route survey will be conducted prior to any heavy hauls to ensure the least amount of impact to the local community. Construction traffic will be limited to the hours indicated in the existing condition of certification to limit impact on the community…." It is also stated that compliance with the conditions of certification in Appendix H would ensure that

potential impacts are reduced to less than significant. However, the original conditions of certification are part of the 1999 licensed Sutter Power Plant Project and given their age some need to be revisited and updated. For example, **TRANS-4** specified a route for truck deliveries, but it is unknown whether that route remains acceptable. **TRANS-5** specified a route for oversized equipment delivered by rail. **TRANS-6** required preparation and implementation of a construction traffic control plan and implementation program; an updated plan will be required as a condition of approval of the Sutter Decarbonization Project.

DATA REQUESTS

A104. Please identify the condition of certification limiting construction traffic to certain hours; staff has been unable to find it.

A105. Please provide details on the route survey, including when the survey will be conducted and how the survey results will be used to update **TRANS-4**.

A106. Please confirm whether oversized equipment would be delivered by rail, and if so, please provided updated route information for **TRANS-5**.

REFERENCES

CARB 2017 – California Air Resources Board. *Final Environmental Analysis for The Strategy for Achieving California's 2030 Greenhouse Gas Target*. Appendix F to the Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target (Scoping Plan). Release Date: November 30, 2017. Accessed: May 2026. Accessed online at: https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/2030sp_appf_finalea.pdf

OPR 2018 – Governor's Office of Planning and Research (renamed the Governor's Office of Land Use and Climate Innovation effective July 1, 2024). *Technical Advisory on Evaluating Transportation Impacts in CEQA*. Section C. Technical Considerations in Assessing Vehicle Miles Traveled. December 2018. Accessed: May 2026. Accessed online at: https://lci.ca.gov/docs/20180416-743_Technical_Advisory_4.16.18.pdf

Sutter County 2011 - Sutter County 2030 General Plan. Policy Document. Chapter 6: Mobility, Goals and Policies. Adopted: March 29, 2011. Accessed: May 2026. Accessed online at: https://www.sutter.gov/government/county-departments/development-services/planning-services/general-plan

VISUAL RESOURCES

Author: Mark Hamblin

BACKGROUND

The petition states, "A visual analysis of the viewshed is included as Appendix G." Staff did not find a visual analysis, renderings, photo simulations, or other related information in Appendix G of the petition. These materials were most likely inadvertently omitted from the petition.

A107. Staff requests that the project owner submit the visual analysis, renderings, photo simulations, and other related information.