REVISED 10/8/26

AGENDA
GRADING PERMIT HEARING
COUNTY OF SACRAMENTO
827 7TH STREET COMMUNITY ROOM 103
SACRAMENTO, CA 95814

TUESDAY **OCTOBER 13, 2026** **9:00 AM**

Grading Administrator/Hearing Officer: Claudia Wade, County Engineer

PUBLIC COMMENT PROCEDURES

The County fosters public engagement during the meeting and encourages public participation, civility and use of courteous language.

In-Person Public Comment
Speakers will be required to complete and submit a speaker request form to Clerk staff. The Chairperson will invite each individual to the podium to make a verbal comment.

Written Public Comment
Members of the public may send a written comment which is distributed to Board members and filed in the record. Contact information is optional and should include the meeting date and agenda/off agenda item number to be sent as follows:

- Email a comment to BoardClerk@saccounty.gov
- Mail a comment to 700 H Street, Suite 2450, Sacramento, CA 95814

MEETING MATERIALS

The on-line version of the agenda and associated material is available at https://sccob.saccounty.gov/us/en/grading-administrator-meetings.html . Some documents may not be posted on-line because of size or format (maps, site plans, renderings). Contact the Clerk's Office at (916) 874-5411 to obtain copies of documents.

ACCOMMODATIONS

If there is a need for an accommodation pursuant to the Americans with Disabilities Act (ADA), medical reasons or for other needs, please contact the

Clerk of the Board by telephone at (916) 874-5411 (voice) and CA Relay Services 711 or Boardclerk@saccounty.gov prior to the meeting.

SUMMARY OF RULES OF PROCEDURE

AGENDA: The Chairperson may reschedule items on the agenda. Order of the agenda will be: non-contested matters, contested matters, then staff presentations.

CONDUCT OF HEARINGS: The sequence for a contested matter is: (1) staff report and environmental document discussion; (2) testimony of proponent(s); (3) public testimony; (4) rebuttal by applicant; (5) close of public hearing; (6) Grading Administrator/Hearing Officer discussion and decision.

EXHIBITS OR DOCUMENTS: Documentary evidence submitted to the Commission becomes the property of the Commission.

CONTINUANCES: The Grading Administrator may continue any matter at its discretion.

ROLL CALL

PLEDGE OF ALLEGIANCE

1. PLER2024-00137 KLG Utilization Project
GRADING PERMIT
Grading Administrator - Final Approval
Supervisorial District(s): Rodriguez

OWNER: County of Sacramento (Sacramento County Department of Waste Management & Recycling)
APPLICANT: Kiefer Landfill Generating III, LLC –
This Property Is Located At 12701 Kiefer Boulevard, Sloughhouse, CA 95683, Approximately 0.6 Miles Southeast Of The Intersection Of Grant Line Road And Kiefer Boulevard, In The Cosumnes Community.

ASSESSOR'S PARCEL NUMBERS:

126-0090-020-0000 and 126-0090-021-0000

PROJECT NAME:

12701 Kiefer Boulevard Grading Permit (Kiefer Landfill Gas Utilization Project)

ENVIRONMENTAL DOCUMENT:

Initial Study/Mitigated Negative Declaration

REQUEST:

A Grading Permit for preparation and grading in excess of 1 acre and more than 350 cubic yards of material for a renewable natural gas plant. The grading plans for the renewable natural gas plant covers a site of approximately 2 acres in size, and associated earth work consisting of approximately 350 cubic yards of cut, approximately 20,900 cubic yards of fill, and approximately 20,550 cubic yards of import.

MISCELLANEOUS

2. Off-Agenda Public Comments

COUNTY OF SACRAMENTO
CALIFORNIA

Control No.: PLER2024-00137
Type: Grading Permit

TO: DEPARTMENT OF COMMUNITY DEVELOPMENT
CLAUDIA WADE, COUNTY ENGINEER
GRADING PERMIT HEARING OFFICER

FROM: COUNTY ENGINEERING DIVISION
SITE IMPROVEMENT & PERMIT SECTION

SUBJECT: 12701 KIEFER BOULEVARD GRADING PERMIT

HEARING: TUESDAY, OCTOBER 13, 2026
COMMUNITY ROOM
827 7TH STREET, ROOM 103
SACRAMENTO, CA 95814
9:00 AM

ASSESSOR'S PARCEL NO.:
126-0090-020-0000 and 126-0090-021-0000

LOCATION:
Kiefer Landfill: 12701 Kiefer Boulevard, Sloughhouse, CA 95683, approximately 0.6 miles southeast of the intersection of Grant Line Road and Kiefer Boulevard

OWNER:
Sacramento County Department of Waste Management and Recycling
10481 Armstrong Avenue, Suite 210
Mather, CA 95655

APPLICANT:
Kiefer Landfill Generating III, LLC
700 Universe Boulevard
Juno Beach, FL 33408

BACKGROUND
The Kiefer Landfill has been in operation since 1967. A landfill gas (LFG) collection system was installed in 1997 in response to environmental regulatory requirements. In 1999, an engine electricity generating plant (KLG 1) was constructed and put into operation by the County to extract energy from collected LFG. KLG 1 is County-owned but operated by Energy Power

Partners (EPP) through contract. In 2006, a second energy plant (KLG 2) was constructed and put into operation by EPP. KLG 2 is owned and operated by EPP through a ground lease agreement and a LFG rights agreement. The County sells the electricity produced by KLG 1 to Sacramento Municipal Utility District (SMUD) under a Power Purchase Agreement (PPA). EPP also sells the electricity produced by KLG 2 to SMUD. The contracts governing KLG 1 and KLG 2 were set to expire on December 31, 2025; however, a new contract with Kiefer Landfill Generating III, LLC (KLG III), an affiliate of NextEra renewable Fuels Development, LLC, was approved by the Board of Supervisors on July 8, 2025. As part of the contract, KLG III is responsible for the design and operation of the new renewable natural gas (RNG) plant, and for obtaining any development entitlements, permits, and complying with the California Environmental Quality Act (CEQA). Implementation of the contract with KLG III would result in construction of an RNG plant with a capacity of 8,000 standard cubic feet per minute (scfm) at Kiefer Landfill and a pipeline connecting the plant to existing Pacific Gas & Electric (PG&E) natural gas pipelines. The RNG plant would process landfill gas to meet the aforementioned regulatory air quality standards, and produce pipeline-quality natural gas by removing moisture and impurities.

PROJECT DESCRIPTION:

The proposed RNG plant is located at Kiefer Landfill in unincorporated Sacramento County. Construction of the RNG plant requires site preparation and grading in excess of 1 acre and 350 cubic yards of earthly material, which is subject to a grading permit from the County pursuant to County Code §16.44.050. The grading plans for the RNG plant cover a site of approximately two acres in size, and associated earth work consisting of approximately 350 cubic yards of cut, approximately 20,900 cubic yards of fill, which results in approximately 20,550 cubic yards of import. The applicant has submitted a Grading and Erosion Control Permit application (Attachment 1). The submitted Grading and Erosion Control Permit proposes fill up to 6 feet above existing grade and interior cuts maintaining the allowable maximum interior side slopes throughout the graded area consistent with the Sacramento County Improvement Standards (SCIS) Section 10-5B. Per the SCIS Section 10-3, interior cuts and fills are permitted to exceed 5 feet by approval of the County Engineer. The County Engineer considers site-specific conditions and the proposed grading design to determine whether the project adequately conforms to applicable County requirements and accepted engineering practices. This includes the consideration of existing and proposed site topography, slope stability, drainage and stormwater conveyance, erosion and sediment control, and the overall compatibility of the proposed grading with the surrounding terrain.

ENVIRONMENTAL DOCUMENT:

As Lead Agency, Sacramento County prepared an Initial Study/Mitigated Negative Declaration (IS/MND) pursuant to CEQA for the proposed project. CEQA Guidelines Section 15003(h) states that a lead agency ‘must consider the whole of an action, and not simply its constituent parts, when determining whether it will have a significant environmental effect.’ As such, the IS/MND analyzes the project as a whole, including the grading required for the RNG plant, the operation of the RNG plant and the pipeline required for operation of the RNG plant. The environmental analysis discussed aesthetics, agriculture and forestry resources, airports, air quality, biological resources, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation, tribal cultural resources,

utilities and service systems, and wildfire. The IS/MND concluded that, with the implementation of mitigation measures, the project would not have a significant effect on the environment.

The IS/MND was released for public review on June 11, 2026 (Attachment 2). Seven (7) public comments were received. A response to the comments received for the environmental analysis was prepared and is included with the IS/MND (Attachment 3). Note that the Final IS/MND includes a revision that removes option 2 of the pipeline alignment terminating near the intersection of Sunrise Boulevard/Douglas Road. A Mitigation Monitoring and Reporting Program (MMRP) has been prepared that includes required mitigation measures and compliance with the South Sacramento Habitat Conservation Plan (SSHCP) (Attachment 4).

FINDINGS:

The Grading and Erosion Control Permit for the project meets all County requirements as follows:

1. The grading design is in compliance with Sacramento County Improvement Standards (SCIS) Sections 10 and 11.
2. The grading design is in compliance with Sacramento County Code Chapter 16.44.
3. The Project will maintain the allowable maximum interior side slopes throughout the graded area consistent with the SCIS Section 10-5B.
4. Per SCIS Section 10-3, interior cuts and fills are permitted to exceed 5 feet with approval of the County Engineer. Th grading plans are designed and proposed to be constructed in a manner that will not cause adverse impacts to the surrounding terrain, and the proposed grading activities will comply with applicable grading standards, regulations, and requirements to ensure the existing surrounding terrain remains stable.

Said project will not have a significant effect on the environment for the following reasons:

1. It will not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory.
2. It will not have the potential to achieve short-term, to the disadvantage of long-term, environmental goals.
3. It will not have impacts, which are individually limited, but cumulatively considerable.
4. It will not have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly.

RECOMMENDATION:

Staff requests the following:

1. Approve the Grading and Erosion Control Permit (GPOC2026-00086).
2. Adopt the Mitigated Negative Declaration as adequate and complete, acknowledge that the County Engineer has considered the Mitigated Negative Declaration and on the basis of the whole administrative record, find that there is no substantial evidence that the project will have a significant effect on the environment and the Mitigated Negative Declaration reflects the County Engineer’s independent judgement and analysis.
3. Adopt the Mitigation Monitoring and Reporting Program.

Attachments:
ATT 1 – Grading and Erosion Control Permit
ATT 2 – Initial Study/Mitigated Negative Declaration
ATT 3 – Response to Comments
ATT 4 – MMRP

Claudia Wade, Hearing Officer
Chief of Development & Surveyor Services

Date

ATTACHMENT 1

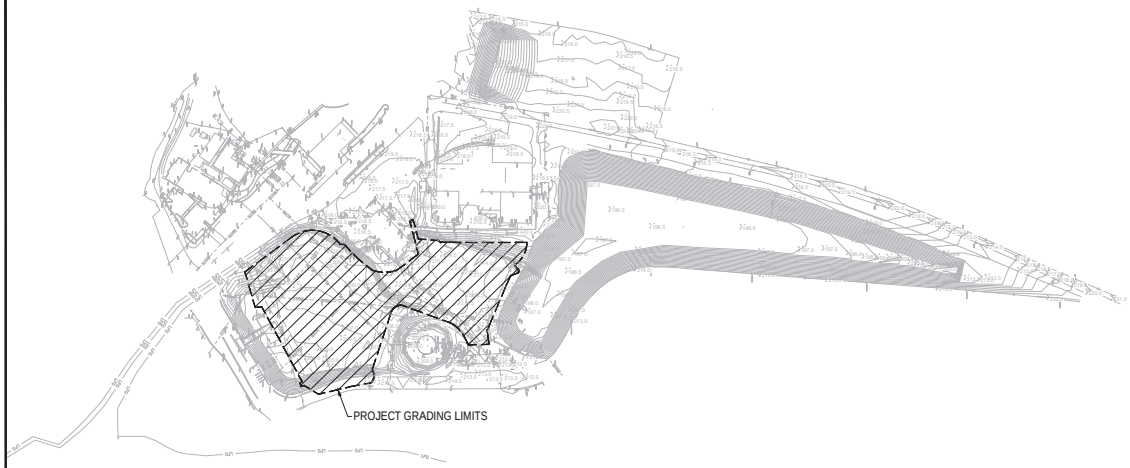
GRADING PERMIT FOR
12701 KIEFER BLVD
KIEFER LANDFILL RNG PROJECT
COUNTY OF SACRAMENTO, CALIFORNIA

EXISTING	PROPOSED	DESCRIPTION
12"D	12"D	STORM DRAIN PIPE & SIZE
8"S	8"S	SANITARY SEWER PIPE & SIZE
6"W	6"W	DOMESTIC WATER PIPE & SIZE
		SANITARY SEWER MANHOLE (STD DETAIL 7-1)
		SANITARY SEWER CLEANOUT / FLUSHING BRANCH (STD DETAIL 7-6)
		STORM DRAIN MANHOLE (STD DETAIL 9-7A)
		STORM DRAIN INLET (STD DETAIL 9-13B TYPE B) (STD DETAIL 9-18 TYPE F)
		GATE VALVE
		BUTTERFLY VALVE WITH ACTUATOR
		FIRE HYDRANT
		BLOW OFF VALVE
		THRUST BLOCK
		AIR RELIEF VALVE
		ADA ACCESSIBLE SIDEWALK RAMP (STD DETAIL 4-23-A)
		STREET SIGN
		STREET SIGN
		MONUMENT WELL (PER FINAL MAP)
2%	2%	DIRECTION OF DRAINAGE
		RIDGE OR GRADE BREAK
		FLOWLINE OF SWALE
		CURB GUTTER AND SIDEWALK (STD DETAIL 4-25)
23.45 51.00	23.45 51.00	ELEVATION CALLOUTS
		STREET / SIDEWALK BARRICADE (STD DETAIL 4-38, 4-40)
		EXISTING TREE
		REMOVE EXISTING TREE
		TOP OF SLOPE BANK
		TOE OFSLOPE BANK
	1 1	DETAIL IDENTIFICATION SHEET LOCATION
	A 1	SECTION IDENTIFICATION SHEET LOCATION
		STREET LIGHT - TYPE B (STD DETAIL 5-16)
		STREET LIGHT - TYPE A (STD DETAIL 5-17)
		PULL BOX (STD DETAIL 5-20A)

SYMBOLS LEGEND

AB	AGGREGATE BASE	MAX	MAXIMUM
AC	ASPHALTIC CONCRETE OR ACRE	MH	MANHOLE
BC	BEGIN HORIZONTAL CURVE	MIN	MINIMUM
BEG	BEGIN	NTS	NOT TO SCALE
BLDG	BUILDING	OH	OVERHEAD
BM	BENCH MARK	PB	PULL BOX
BW	BOTTOM OF WALL	PCC	POINT OF COMPOUND CURVE OR PORTLAND CONCRETE CEMENT
BSBL	BUILDING SET BACK LINE		
C&G	CURB AND GUTTER	PEC	PHOTO ELECTRIC CELL
C.G&S	CURB, GUTTER AND SIDEWALK	PED	PEDESTRIAN
CL, ℄	CENTERLINE	PI	POINT OF INTERSECTION
CMP	CORRUGATED METAL PIPE	PL, ℞	PROPERTY LINE
CSP	CORRUGATED STEEL PIPE	PP	POWER POLE
CO	CLEANOUT OR COUNTY	PRC	POINT OF REVERSE CURVE
CONC	CONCRETE	PRKG	PARKING
CONST	CONSTRUCT	PT	POINT OF TANGENCY
COTG	CLEANOUT TO GRADE	PUE	PUBLIC UTILITY EASEMENT
CR	CURB RETURN	PVC	POLYVINYL CHLORIDE
CSP	CORRUGATED STEEL PIPE	PVMT	PAVEMENT
△	INCLUDED ANGLE	R	RADIUS OR RIDGE
D	STORM DRAIN	RAD	RADIAL
DCDA	DOUBLE CHECK DETECTOR ASSEMBLY	RP	REDUCED PRESSURE BACKFLOW PREVENTER
DI	DRAIN INLET		
DIA, Ø	DIAMETER	RT	RIGHT
DIP	DUCTILE IRON PIPE	R/W	RIGHT OF WAY
DMH	STORM DRAIN MANHOLE	S	SLOPE OR SEWER
DTL	DETAIL	SD	STORM DRAIN
DWG	DRAWING	SFL	SWALE FLOWLINE
DWY	DRIVEWAY	SL	STREET LIGHT
(E), EXIST	EXISTING	SMH	SEWER MANHOLE
EC	END HORIZONTAL CURVE	SS	SANITARY SEWER
EP	EDGE OF PAVEMENT	STA	STATION
ESMT	EASEMENT	STD	STANDARD
FL, ℄	FLOWLINE	SW	SIDEWALK
G	GAS	TB	TOP OF BANK
GB	GRADE BREAK	TC	TOP OF CURB
GFL	GUTTER FLOWLINE	TEL	TELEPHONE
GR	INLET GRATE	TEMP	TEMPORARY
HDPE	HIGH DENSITY POLYETHYLENE PIPE	TMH	TELEPHONE MANHOLE
HGL	HYDRAULIC GRADE LINE	TP	TELEPHONE POLE
INTX	INTERSECTION	TRANS	TRANSITION
INV	PIPE INVERT	TS	TRAFFIC SIGNAL
IRR	IRRIGATION	TW	TOP OF WALL
JP	JOINT POLE	TYP	TYPICAL
L	LENGTH	UG	UNDERGROUND
LIP	EDGE OF GUTTER PAN	VCP	VITRIFIED CLAY PIPE
LSCP	LANDSCAPE	W	WATER
LT	LEFT	WS	WATER SERVICE

ABBREVIATIONS



SITE PLAN

NOTE:
A SEPARATE ENCROACHMENT PERMIT IS REQUIRED FOR ANY WORK WITHIN THE ROW INCLUDING PAVEMENT REPAIR AND DRIVEWAY CONSTRUCTION.



LOCATION MAP NO SCALE

NO.	DESCRIPTION
	CIVIL
C - 1	COVER SHEET
C - 2	NOTES
C - 3	SECTIONS
C - 4	EXISTING CONDITIONS
C - 5	OVERALL ROUGH GRADING & DRAINAGE PLAN
C - 6	ROUGH GRADING & DRAINAGE PLAN
C - 7	ROUGH GRADING & DRAINAGE PLAN
C - 8	EROSION CONTROL PLAN
C - 9	EROSION CONTROL NOTES & DETAILS

SHEET INDEX

WDID: 5S34C413164

CONSTRUCTION START DATE: MARCH 1, 2027	
FINAL STABILIZATION DATE: JUNE 1, 2027	
AREA DISTURBANCE (AC): 3.75 ACRES	
VOL. OF CUT (CY): 350	VOL. OF FILL (CY): 20,900
POST-CONST. STORMWATER BMP'S REQ'T (Y/N): N	

OWNER / DEVELOPER:
KIEFER LANDFILL GENERATING III, LLC
700 UNIVERSE BOULEVARD
JUNO BEACH, FL 33408
PHONE: (415) 846-3058
ATTN: JOSEPH MATTEO, VP

EARTHWORK (RAW)

CUT =	350	- CUBIC YARDS
FILL =	20,900	- CUBIC YARDS
IMPORT =	20, 550	- CUBIC YARDS

ROUGH GRADING ONLY:
DO NOT CONSTRUCT CURBS AND GUTTERS, SIDEWALKS, PAVEMENT, UNDERGROUND FACILITIES OR WALLS.

SACRAMENTO COUNTY
PUBLIC WORKS AND INFRASTRUCTURE AGENCY

PROJECT TITLE:	12701 KIEFER BLVD (GP)
ASSESSORS PARCEL NUMBER:	126-0090-020-0000
APPROVED:	
ORDER NUMBER: 90019236	DRAINAGE FEE:
CHECK BY:	DRAINAGE APPROVED:

REVISIONS					
NO.	DESCRIPTION	APPD. ENGR.	DATE	APPD. E.U.	DATE
△					
△					
△					
△					

SCALE:
HORIZ. 1" = 100'
VERT. 1" = N/A

BENCH MARK BM U01B-001 STAMPED W-33
ELEV 214.07 (NAVD 88)
STANDARD BRONZE DISC STAMPED 'U.S.G.S. B.M. W-33 1940 212' LOCATED AT SOUTHWEST CORNER OF GRANT LINE ROAD & KIEFER BLVD. 3' WEST & 4' SOUTH OF FENCE CORNER 9 PACES WEST OF CENTER OF GRANT LINE RD. & 13 PACES SOUTH OF CENTER OF KIEFER BLVD. LEVELS RUN FROM U.S.G.S. DATA W-33 (APRIL 1961)

COMPUTED	MJC
DESIGNED	DVG
DRAWN	CEC
PROJ. ENGR.	CDK

REGISTERED PROFESSIONAL ENGINEER — CHRISTOPHER D. KNOX — No. 62960 — CIVIL — STATE OF CALIFORNIA

MORTON & PITALO, INC.
CIVIL ENGINEERING • LAND PLANNING • LAND SURVEYING
Folsom ★ Fresno
600 Cooridge Drive, Suite #140
Folsom, CA 95630
phone: (916) 984-7621
web: www.mpengr.com

12701 KIEFER BLVD GRADING PLANS
KIEFER LANDFILL
COVER SHEET
COUNTY OF SACRAMENTO, CALIFORNIA

DATE 10/08/2026
SHEET C-1
OF 9

JOB NO. 250031

Morton & Pitalo, Inc.

Dwg: X:\2025\250031.00 (KIEFER LANDFILL PROJECT)\CIVIL\EXHIBITS\KIEFER RNG\250031-C101 COVER SHEET.dwg | Saved: 10-08-26 09:54am | CARRERA

GENERAL NOTES:

1. ALL WORK TO BE DONE IN ACCORDANCE WITH THE STANDARD SPECIFICATIONS AND DETAILS FOR THE COUNTY OF SACRAMENTO, CALIFORNIA, EXCEPT WHERE SPECIFICALLY NOTED ON THE PLANS. ANY DEVIATION FROM APPROVED PLANS DURING CONSTRUCTION WILL REQUIRE PROPER NOTICE TO THE ENGINEER AND APPROVAL OF THE COUNTY ENGINEER. AT LEAST ONE SET OF PLANS SHALL BE ON THE SITE AT ALL TIMES FOR INSPECTION.

2. CONTRACTOR SHALL COMPLY WITH ALL STATE, COUNTY AND CITY LAWS AND ORDINANCES, AND REGULATIONS OF THE DEPARTMENT OF INDUSTRIAL RELATIONS, O.S.H.A. AND INDUSTRIAL ACCIDENT COMMISSION RELATING TO THE SAFETY AND CHARACTER OF WORK, EQUIPMENT, AND LABOR PERSONNEL.

3. ALL CONSTRUCTION MATERIALS AND METHODS SHALL COMPLY WITH THE ORDINANCES, SPECIFICATIONS, AND STANDARDS OF THE COUNTY OF SACRAMENTO WITH THE EXCEPTION AS NOTED ON THE PLANS.

4. THE CONTRACTOR'S ATTENTION IS DIRECTED TO THE REQUIREMENTS OF THE DIVISION OF INDUSTRIAL SAFETY PERTAINING TO "CONFINED SPACES." ANY MANHOLE, CULVERT, DROP INLET OR TRENCH (WHICH MAY CONTAIN AIR), THAT IS NOT READILY VENTILATED MAY BE CONSIDERED A "CONFINED SPACE."

5. CONTRACTOR SHALL CONSPICUOUSLY POST ON THE JOB SITE EMERGENCY TELEPHONE NUMBERS FOR ENGINEER CONSTRUCTION DIVISION, AMBULANCE, POLICE, AND FIRE DEPARTMENT. CONTRACTOR SHALL PROVIDE THE COUNTY ENGINEER WITH THE TELEPHONE NUMBERS OF ONE SUPERINTENDENT AND TWO APPOINTED ALTERNATES FOR AFTER HOUR EMERGENCIES.

6. ALL WORK SHALL BE ACCOMPLISHED TO THE SATISFACTION OF THE COUNTY OF SACRAMENTO ENGINEER OR HIS AUTHORIZED REPRESENTATIVE.

7. ALL REFERENCE TO THE STANDARD SPECIFICATIONS SHALL MEAN THE COUNTY OF SACRAMENTO STANDARD CONSTRUCTION SPECIFICATIONS DATED NOVEMBER 1, 2024.

8. THE CONTRACTOR SHALL HAVE A RESPONSIBLE PARTY, WHO SHALL HAVE FULL AUTHORITY TO REPRESENT AND ACT FOR THE CONTRACTOR ON SITE AT ALL TIMES DURING WORKING HOURS.

9. THE CONTRACTOR SHALL NOTIFY THE COUNTY OF SACRAMENTO 7 DAYS IN ADVANCE OF COMMENCING WORK TO SCHEDULE A PRE-CONSTRUCTION CONFERENCE AND INSPECTION WITH THE ENGINEER AND THE COUNTY OF SACRAMENTO. NO WORK SHALL BEGIN UNTIL AFTER THE PRE-CONSTRUCTION CONFERENCE AND INSPECTION HAVE BEEN COMPLETED.

10. CONTRACTOR AGREES THAT IN ACCORDANCE WITH GENERALLY ACCEPTED CONSTRUCTION PRACTICES, CONTRACTOR SHALL BE REQUIRED TO ASSUME SOLE AND COMPLETE RESPONSIBILITY FOR JOB SITE CONDITIONS DURING THE COURSE OF CONSTRUCTION OF THE PROJECT, INCLUDING SAFETY OF ALL PERSONS AND PROPERTY: THAT THIS REQUIREMENT SHALL BE MADE TO APPLY CONTINUOUSLY AND NOT BE LIMITED TO NORMAL WORKING HOURS, AND CONTRACTOR FURTHER AGREES TO DEFEND, INDEMNIFY AND HOLD DESIGN PROFESSIONAL HARMLESS FROM ANY AND ALL LIABILITY REAL OR ALLEGED IN CONNECTION WITH THE PERFORMANCE OF WORK ON THIS PROJECT, EXCEPTING LIABILITY ARISING FROM THE SOLE NEGLIGENCE OF DESIGN PROFESSIONAL.

11. RIGHTS TO ENTER AND CONSTRUCT SHALL BE OBTAINED PRIOR TO CONSTRUCTING ANY OFF-SITE WORK SHOWN IN THESE PLANS. COPIES OF SUCH DOCUMENTS SHALL BE KEPT ON-SITE AT ALL TIMES DURING THE PERFORMANCE OF OFF-SITE WORK.

12. COUNTY OF SACRAMENTO CONDITIONS OF APPROVAL, DATED _____________, SHALL BE A PART OF THIS CONTRACT AND SHALL BE CONSULTED ALONG WITH THESE IMPROVEMENT PLANS.

13. THE CONTRACTOR SHALL NOT CONSTRUCT ANY WORK WITHOUT ADEQUATE CONSTRUCTION STAKING. AS A MINIMUM, THE FOLLOWING STAKING SHALL BE REQUIRED: 1) CLEARING LIMITS, 2) SLOPE STAKES, 3) WATER LINE STAKES, 4) SEWER LINE STAKES, 5) STORM DRAIN STAKES, 6) AC PAVING STAKES. ADDITIONAL STAKING MAY BE REQUIRED BY THE COUNTY OF SACRAMENTO DUE TO THE NATURE AND/OR COMPLEXITY OF THE WORK. LOST OR DAMAGED STAKES SHALL BE REPLACED TO THE SATISFACTION OF THE COUNTY OF SACRAMENTO WHETHER RESULTING FROM CONSTRUCTION PROCEDURES, VANDALISM, OR ANY OTHER CAUSE.

14. THE CONTRACTOR SHALL PROVIDE, PLACE AND MAINTAIN ALL LIGHTS, SIGNS, DELINEATORS, BARRICADES, TEMPORARY TRAFFIC STRIPING, FLAGMEN, DETOURS OR OTHER DEVICES NECESSARY TO PROVIDE FOR THE SAFE AND CONVENIENT PASSAGE OF PUBLIC VEHICLE AND PEDESTRIAN TRAFFIC THROUGH THE CONSTRUCTION SITE.

15. THE CONTRACTOR SHALL BE RESPONSIBLE FOR DUST CONTROL DURING CONSTRUCTION. AT LEAST ONE WATER TRUCK SHALL BE ON SITE AT ALL TIMES. ADDITIONAL EQUIPMENT MAY BE REQUIRED AS DETERMINED BY THE COUNTY OF SACRAMENTO.

16. IF UNUSUAL AMOUNTS OF STONE, BONE, OR ARTIFACTS ARE UNCOVERED DURING CONSTRUCTION, ALL WORK SHALL BE STOPPED WITHIN ONE HUNDRED FEET (100') OF THE FIND, AND A QUALIFIED ARCHAEOLOGIST CONSULTED FOR AN ON-SITE EVALUATION. IF THE BONE APPEARS TO BE HUMAN, THE SACRAMENTO COUNTY CORONER MUST BE CONTACTED.

17. UPON JOB COMPLETION, IT SHALL BE THE RESPONSIBILITY OF THE CONTRACTOR TO PROVIDE SCS ENGINEERS, INFORMATION TO ERIC SONSTHAGEN (ENGINEER), REGARDING ANY MATERIAL CHANGES MADE DURING CONSTRUCTION AS WELL AS ANY OTHER INFORMATION REQUIRED TO BE SHOWN ON THE RECORD DRAWINGS BY THE COUNTY OF SACRAMENTO, OTHER UTILITY COMPANIES, OR OTHER RESPONSIBLE AGENCIES.

18. CLEARING AND GRUBBING SHALL CONFORM TO THE PROVISIONS OF SECTION 15, "CLEARING AND GRUBBING" OF THE STANDARD SPECIFICATIONS. ROOTS, STUMPS, TREES, ROCKS OR OTHER DELETERIOUS SUBSTANCES SHALL BE DISPOSED OF OFF-SITE AND IN A LAWFUL MANNER.

19. EXCAVATIONS SHALL BE ADEQUATELY SHORED, BRACED AND SHEETED OR SLOPED BACK SO THAT THE EARTH WILL NOT SLIDE OR SETTLE AND SO THAT ALL EXISTING IMPROVEMENTS OF ANY KIND WILL BE FULLY PROTECTED FROM DAMAGE. ANY DAMAGE RESULTING FROM LACK OF ADEQUATE SHORING, BRACING AND SHEETING SHALL BE THE RESPONSIBILITY OF THE CONTRACTOR AND HE SHALL EFFECT NECESSARY REPAIRS OR RECONSTRUCTION AT HIS OWN EXPENSE. WHERE THE EXCAVATION FOR A CONDUIT TRENCH, STRUCTURE AND/OR BORING IS FIVE FEET OR MORE IN DEPTH, THE CONTRACTOR SHALL CONFORM TO THE APPLICABLE CONSTRUCTION SAFETY ORDERS OF THE DIVISION OF INDUSTRIAL SAFETY OF THE STATE OF CALIFORNIA. THE CONTRACTOR SHALL COMPLY WITH OSHA REQUIREMENTS.

20. ASPHALT CONCRETE SHALL CONFORM TO THE PROVISIONS OF SECTION 23, "ASPHALT CONCRETE" OF THE STANDARD SPECIFICATIONS FOR TYPE B ASPHALT CONCRETE. ASPHALT BINDER SHALL BE PERFORMANCE GRADE 64-16. AGGREGATE FOR THE TOP LIFTS SHALL BE 1/2" MAXIMUM, MEDIUM GRADATION. AGGREGATE FOR LOWER LIFTS SHALL BE 3/4" MAXIMUM GRADATION. LIFT THICKNESS SHALL CONFORM TO THE PROVISIONS OF SECTION 23-8, "AC PLACEMENT METHOD" OF THE STANDARD SPECIFICATIONS. ASPHALT CONCRETE SHALL NOT BE PLACED UNTIL THE PRIOR GRADING PLANE HAS BEEN APPROVED BY THE COUNTY OF SACRAMENTO, AND ALL UTILITIES WITHIN THE PAVED AREA HAVE BEEN PLACED, TESTED, AND APPROVED.

21. BLASTING ACTIVITIES ARE NOT ALLOWED.

22. NO BURNING ACTIVITIES ARE ALLOWED.

23. CONTRACTOR SHALL NOT DESTROY ANY PERMANENT SURVEY POINTS WITHOUT THE CONSENT OF THE COUNTY SURVEYOR. ANY PERMANENT MONUMENT OR POINTS DESTROYED SHALL BE REPLACED BY A LICENSED SURVEYOR AT THE CONTRACTOR'S EXPENSE.

24. OMISSIONS AND ERRORS ON PLANS SHALL NOT BE VALID, AND ALL CODES AND LAWS MUST BE COMPLIED WITH BY THE OWNER, ENGINEER AND CONTRACTOR.

25. CONTRACTOR SHALL BE REQUIRED TO KEEP DRAINAGE IMPROVEMENTS OPERABLE THROUGHOUT CONSTRUCTION. REMOVAL OF SEDIMENT DEPOSITS AND VEGETATIVE MATERIALS IN PIPES, INLET STRUCTURES AND DRAINAGE INVERTS SHALL BE PERFORMED AT A REGULAR MAINTENANCE INTERVAL TO PREVENT ACCUMULATION AND OBSTRUCTION OF DRAINAGE IMPROVEMENT OPERATION.

26. ALL GRADING IS TO BE DONE IN ACCORDANCE WITH THE COUNTY OF SACRAMENTO REQUIREMENTS AND THE GEOTECHNICAL ENGINEERING REPORT: KIEFER LANDFILL RENEWABLE NATURAL GAS FACILITY PRELIMINARY GEOTECHNICAL REPORT, PREPARED BY TERRACON, DATED DECEMBER 2, 2024.

GENERAL NOTES (CONT.):

27. THE CONTRACTOR SHALL BE RESPONSIBLE FOR IMPLEMENTING ALL TEMPORARY EROSION CONTROL MEASURES SHOWN ON THE EROSION CONTROL PLAN. ALL SUCH MEASURES SHALL CONFORM TO THE COUNTY OF SACRAMENTO GRADING, EROSION AND SEDIMENT CONTROL ORDINANCE TO ENSURE THAT SEDIMENT LADEN RUNOFF DOES NOT LEAVE THE PROJECT SITE. THE CONTRACTOR SHALL BE RESPONSIBLE FOR THE MAINTENANCE AND PERFORMANCE OF THE TEMPORARY EROSION CONTROL MEASURES THROUGH THE DURATION OF THE PROJECT. SEE PROJECT SWPPP FOR ADDITIONAL EROSION AND SEDIMENTATION CONTROL MEASURES AND NOTES.

SACRAMENTO COUNTY REQUIRED NOTES

1. ALL CONSTRUCTION AND MATERIALS SHALL BE IN ACCORDANCE WITH THE COUNTY OF SACRAMENTO STANDARD CONSTRUCTION SPECIFICATIONS AND IMPROVEMENT STANDARDS. WHERE INCONSISTENCIES EXIST, THE LATEST EDITION SHALL TAKE PRECEDENCE.
2. PUBLIC CONVENIENCE, PUBLIC SAFETY AND TRAFFIC CONTROL SHALL BE PROVIDED IN ACCORDANCE WITH SECTIONS 12-2 AND 12-3 OF THE STANDARD CONSTRUCTION SPECIFICATIONS AND AS DIRECTED BY THE COUNTY INSPECTOR. SAFE VEHICULAR AND PEDESTRIAN ACCESS SHALL BE PROVIDED AT ALL TIMES DURING CONSTRUCTION.
3. THE CONSULTANT ENGINEER SHALL NOTIFY THE COUNTY OF SACRAMENTO CONSTRUCTION OFFICE [PHONE: (916) 875-2700] UPON COMPLETION OF STAKING.
4. THE CONTRACTOR SHALL NOTIFY THE COUNTY OF SACRAMENTO CONSTRUCTION INSPECTION OFFICE TWO (2) WORKING DAYS PRIOR TO THE INTENTION TO COMMENCE WORK. THE CONTRACTOR SHALL NOT START ANY GRADING UNTIL THE COUNTY COMPLETES A PRE-CONSTRUCTION MEETING [(916) 875-2700].
5. THE COUNTY OF SACRAMENTO IS A MEMBER OF THE UNDERGROUND SERVICE ALERT (USA) ONE CALL PROGRAM. THE CONTRACTOR OR ANY SUBCONTRACTOR FOR THIS CONTRACT SHALL NOTIFY MEMBERS OF USA TWO (2) WORKING DAYS IN ADVANCE OF PERFORMING ANY EXCAVATION WORK BY CALLING THE TOLL-FREE NUMBER: 1(800) 227-2600. THOMAS BROTHERS MAP PAGE INDEX .
6. THE CONTRACTOR SHALL BE RESPONSIBLE FOR THE PROTECTION OF ALL EXISTING SURVEY MONUMENTS OR MARKERS. MONUMENTS OR MARKERS DESTROYED DURING CONSTRUCTION SHALL BE REPLACED AT THE CONTRACTOR'S EXPENSE.
7. ALL SERVICE SEWERS SHALL HAVE FOUR (4) TO FIVE (5) FEET OF COVER AT THE PROPERTY LINE OR RIGHT-OF-WAY, UNLESS OTHERWISE NOTED ON PLANS.
8. EROSION CONTROL MEASURES SHALL BE IN ACCORDANCE WITH SECTION 11 OF THE COUNTY OF SACRAMENTO IMPROVEMENT STANDARDS.
9. THE CONTACTOR SHALL NOTIFY THE COUNTY INSPECTOR IF EXCESS SOIL IS DISPOSED OFF- SITE. THE DISPOSAL OF EXCESS SOIL SHALL NOT COMMENCE UNTIL THE COUNTY *INSPECTOR HAS VERIFIED* THAT THE EXPORT SITE IS NOT SUBJECT TO THE COUNTY GRADING ORDINANCE NOR THE FLOODPLAIN ORDINANCE.
10. ALL TRENCH RESTORATION SHALL COMPLY WITH SECTION 14 "RESTORATION OF SURFACES" OF THE SACRAMENTO COUNTY STANDARD CONSTRUCTION SPECIFICATIONS.
11. CMID INSPECTOR SHALL FIELD MARK ANY DEFECTIVE PUBLIC CURBS, GUTTERS, SIDEWALKS, OR DRIVEWAYS (UNEVEN, BROKEN, PROJECTING, OR DETERIORATING), NOT SPECIFICALLY IDENTIFIED ON THE IMPROVEMENT PLANS, FOR REPAIR AND/OR REPLACEMENT DURING THE TIME OF CONSTRUCTION AS NECESSARY FOR PUBLIC HEALTH AND SAFETY. REMOVAL AND REPLACEMENT ARE REQUIRED IF THE VERTICAL CHANGE EXCEEDS ONE-HALF INCH OR IF ANY CRACKS EXCEED ONE- QUARTER INCH IN WIDTH. MODIFICATION (I.E., GRINDING & PATCHING) OF SIDEWALKS IS REQUIRED IF THE VERTICAL CHANGE IN SIDEWALK AREA EXCEEDS ONE-QUARTER INCH BUT LESS THAN ONE-HALF INCH. IN SOME CASES, TREE ROOTS MAY BE ENCOUNTERED WHICH MAY REQUIRE CUTTING TREE ROOTS OR TREE REMOVAL TO DO THE NECESSARY REPAIRS (PLEASE REFER TO SECTIONS 10-13 AND 15-1 OF THE COUNTY STANDARD CONSTRUCTION SPECIFICATIONS FOR SPECIFIC REQUIREMENTS). A COUNTY TREE PERMIT IS REQUIRED FOR ANY NATIVE OAK TREE ROOT CUTTING WITHIN THE DRIPLINE OF THE TREE. IMPROVEMENTS WILL ONLY BE REQUIRED WITHIN THE PROPERTY LIMITS/BOUNDARY OF THE PROJECT SITE.
12. THE PAY REDUCTION FACTORS NOTED IN SECTION 23-9.02 DO NOT APPLY TO PRIVATELY CONSTRUCTED PROJECT(S). IF THE PERCENT OF THEORETICAL MAXIMUM DENSITY DOES NOT COMPLY WITH THE REQUIREMENTS OF THE STANDARD CONSTRUCTION SPECIFICATIONS, THE CONTRACTOR SHALL REMOVE AND REPLACE THE LIMITS AS FIELD MARKED BY THE CMID INSPECTOR.

ASPHALT CONCRETE NOTES

ANY PAVEMENT WORK WITHIN COUNTY R/W SHALL BE SUBJECT TO SECTION 23 OF THE STANDARD CONSTRUCTION SPECIFICATIONS AS MODIFIED BELOW:

1. **TEST METHODS:** THE FOLLOWING IS ADDED AFTER THE SECOND PARAGRAPH OF SECTION 23-2.04, "TEST METHODS" OF THE STANDARD CONSTRUCTION SPECIFICATIONS:

   ALL REFERENCES TO AASHTO T 308 IN SECTION 23 MUST BE REPLACED WITH AASHTO T 308 (MODIFIED).

   AASHTO T 308 (MODIFIED) IS AASHTO T 308 WITH THE FOLLOWING PARAMETERS:

   1. BATCH SAMPLES DOWN TO NO.8 SIEVE.
   2. REPLACE NO. 40 SIEVE WITH NO.100 SIEVE.
   3. REPLACE SECTION A2.9.2 WITH: DETERMINE THE AVERAGE DIFFERENCE FOR THE TWO VALUES. THE AGGREGATE CORRECTION FACTORS (EQUAL TO THE RESULTANT AVERAGE DIFFERENCES) FOR ALL SIEVES MUST BE APPLIED TO ALL ACCEPTANCE GRADATION TEST RESULTS DETERMINED BY T 30, PRIOR TO FINAL ROUNDING AND REPORTING.

   ALL REFERENCES TO AASHTO T 27 IN SECTION 23 MUST BE REPLACED WITH AASHTO T 30 AND CALIFORNIA TEST 384 MUST NOT BE USED TO TEST THE COMBINED AGGREGATE GRADATION.

2. **GRADATIONS:** THE FOLLOWING IS ADDED BEFORE THE FIRST PARAGRAPH OF SECTION 23-3.01.C, "GRADATIONS" OF THE STANDARD CONSTRUCTION SPECIFICATIONS:

   TEST FOR AGGREGATE GRADATION UNDER AASHTO T30.

   CHOOSE A TV WITHIN THE TV LIMITS SHOWN IN THE TABLES TITLED "AGGREGATE GRADATIONS FOR HMA-LG."

   GRADATIONS ARE BASED ON NOMINAL MAXIMUM SIZE AGGREGATE.

3. **GRADATIONS:** THE FIRST PARAGRAPH OF SECTION 23-5.04.B.2 "GRADATIONS" OF THE STANDARD CONSTRUCTION SPECIFICATIONS IS DELETED.

4. **AGGREGATE GRADATIONS:** THE FOLLOWING IS ADDED BEFORE THE FIRST PARAGRAPH OF SECTION 23-10.06.C.2, "AGGREGATE GRADATIONS" OF THE STANDARD CONSTRUCTION SPECIFICATIONS:

   TEST FOR AGGREGATE GRADATION UNDER AASHTO T30.

   CHOOSE A TV WITHIN THE TV LIMITS SHOWN IN THE TABLES TITLED "AGGREGATE GRADATIONS FOR RHMA-G."

   GRADATIONS ARE BASED ON NOMINAL MAXIMUM SIZE AGGREGATE.

REVISIONS NO.	DESCRIPTION	APPD. ENGR.	DATE	APPD. E.U.	DATE
△					
△					
△					
△					
△					

SCALE:
HORIZ. 1" = ________
VERT. 1" = N/A

BENCH MARK BM U01B-001 STAMPED W-33
ELEV 214.07 (NAVD 88)
STANDARD BRONZE DISC STAMPED 'U.S.G.S. B.M. W-33 1940 212" LOCATED AT SOUTHWEST CORNER OF GRANT LINE ROAD & KIEFER BLVD. 3' WEST & 4' SOUTH OF FENCE CORNER 9 PACES WEST OF CENTER OF GRANT LINE RD. & 13 PACES SOUTH OF CENTER OF KIEFER BLVD. LEVELS RUN FROM U.S.G.S. DATA W-33 (APRIL 1961)

COMPUTED	MJC
DESIGNED	DVG
DRAWN	CEC
PROJ. ENGR.	CDK

REGISTERED PROFESSIONAL ENGINEER
EDWIN KHO Y
No. C59345
CIVIL
STATE OF CALIFORNIA

MORTON & PITALO, INC.
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Folsom, CA 95630
phone: (916) 984-7621
web: www.mpengr.com

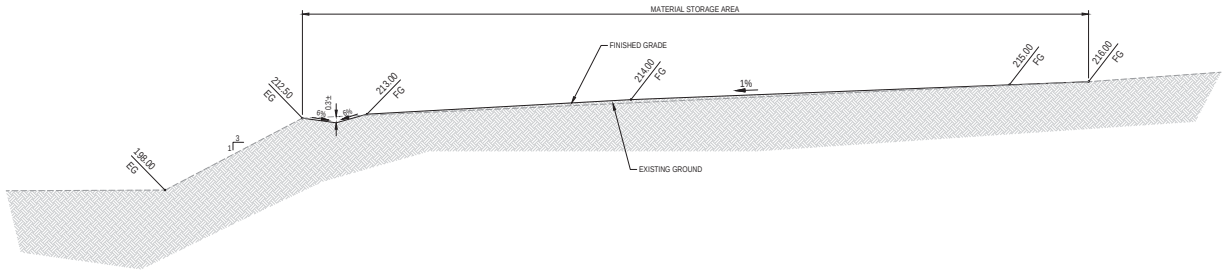
12701 KIEFER BLVD GRADING PLANS
KIEFER LANDFILL
NOTES
COUNTY OF SACRAMENTO, CALIFORNIA

DATE 10/08/2026
SHEET C-2
OF 9

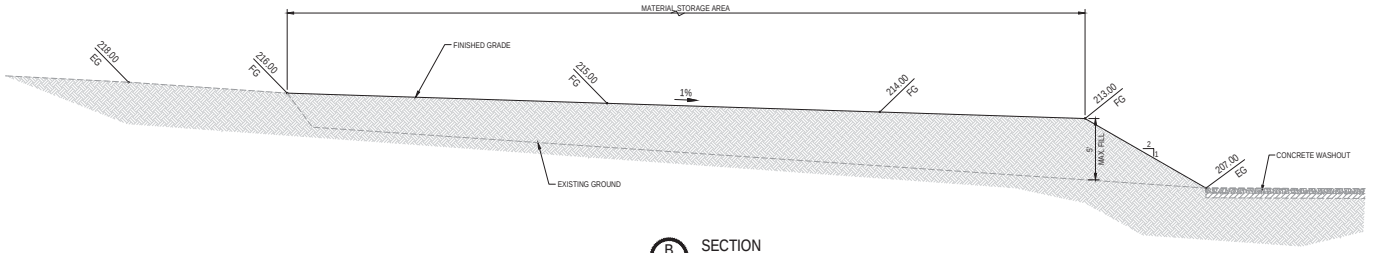
JOB NO. 250031

Morton & Pitalo, Inc.

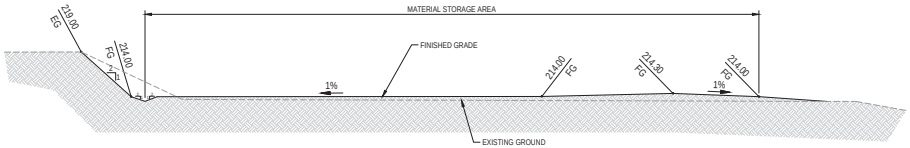
Dwg: X:\2025\25-0031-00 (KIEFER LANDFILL PROJECT)\DWG\ENG\WORKING\250031-C102-NT01.DWG | Saved: 09-28-26 02:42pm CCARRERA



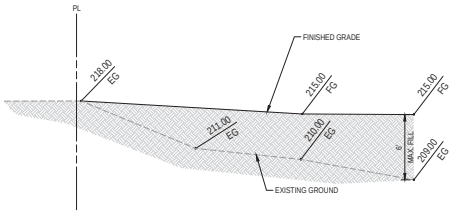
A C-6 SECTION



B C-7 SECTION



C C-6 SECTION



D C-6 SECTION

REVISIONS						
NO.	DESCRIPTION	APPD. ENGR.	DATE	APPD. E.U.	DATE	

SCALE:

HORIZ. 1" = _____

VERT. 1" = N/A

BENCH MARK BM U01B-001 STAMPED W-33

ELEV 214.07 (NAVD 88)

STANDARD BRONZE DISC, STAMPED "U.S.G.S. B.M. W-33 1940 212" LOCATED AT SOUTHWEST CORNER OF GRANT LINE ROAD & KIEFER BLVD. 3' WEST & 4' SOUTH OF FENCE CORNER 9 PACES WEST OF CENTER OF GRANT LINE RD. & 13 PACES SOUTH OF CENTER OF KIEFER BLVD. LEVELS RUN FROM U.S.G.S. DATA W-33 (APRIL 1961)

COMPUTED	MJC
DESIGNED	DVG
DRAWN	CEC
PROJ. ENGR.	CDK

REGISTERED PROFESSIONAL ENGINEER — CHRISTOPHER D. KNOX — No. 62902 — CIVIL — STATE OF CALIFORNIA

MORTON & PITALO, INC.
CIVIL ENGINEERING • LAND PLANNING • LAND SURVEYING
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phone: (916) 984-7621
web: www.mpengr.com

12701 KIEFER BLVD GRADING PLANS

KIEFER LANDFILL

SECTIONS

COUNTY OF SACRAMENTO, CALIFORNIA

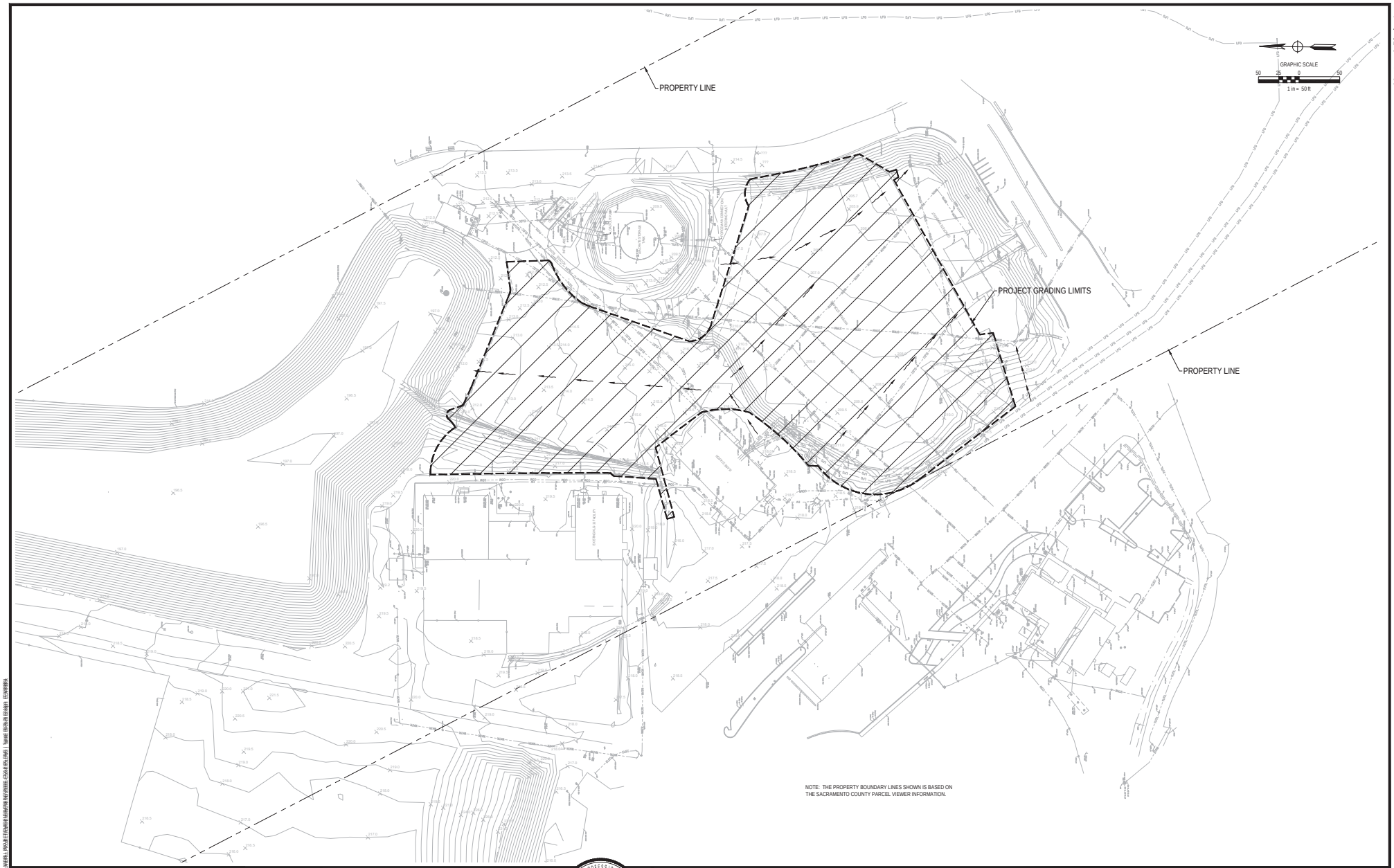
DATE 10/08/2026

SHEET C-3

OF 9

JOB NO. 250031

Morton & Pitalo, Inc.



Morton & Pitalo, Inc.

REVISIONS

NO.	DESCRIPTION	APPD. ENGR.	DATE	APPD. E.U.	DATE
1					
2					
3					
4					
5					

SCALE:

HORIZ. 1" = 50'

VERT. 1" = N/A

BENCH MARK BM U01B-001 STAMPED W-33

ELEV 214.07 (NAVD 88)

STANDARD BRONZE DISC STAMPED "U.S.G.S. B.M. W-33 1940 212" LOCATED AT SOUTHWEST CORNER OF GRANT LINE ROAD & KIEFER BLVD. 3' WEST & 4' SOUTH OF FENCE CORNER 9 PACES WEST OF CENTER OF GRANT LINE RD. & 19 PACES SOUTH OF CENTER OF KIEFER BLVD. LEVELS RUN FROM U.S.G.S. DATA W-33 (APRIL 1961)

COMPUTED	MJC
DESIGNED	DVG
DRAWN	CEC
PROJ. ENGR.	CDK

REGISTERED PROFESSIONAL ENGINEER — JOSEPH KRO — No. 52900 — CIVIL — STATE OF CALIFORNIA

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12701 KIEFER BLVD GRADING PLANS

KIEFER LANDFILL

EXISTING CONDITIONS

COUNTY OF SACRAMENTO, CALIFORNIA

DATE 10/08/2026

SHEET C-4

OF 9

JOB NO. 250031



LEGEND

SURFACE FLOW DIRECTION

OVERLAND RELEASE

NOTE

CONTRACTOR TO FIELD VERIFY LOCATION AND DEPTH OF ALL EXISTING WET AND DRY UTILITIES WITHIN THE PROJECT LIMIT PRIOR TO ROUGH GRADING.

NOTE: THE PROPERTY BOUNDARY LINES SHOWN IS BASED ON THE SACRAMENTO COUNTY PARCEL VIEWER INFORMATION.

GRAPHIC SCALE

60 30 0 60

1 in = 60 ft

Morton & Pitalo, Inc.

REVISIONS

NO.	DESCRIPTION	APPD. ENGR.	DATE	APPD. E.U.	DATE

SCALE:

HORIZ. 1" = 60'

VERT. 1" = N/A

BENCH MARK BM U01B-001 STAMPED W-33

ELEV 214.07 (NAVD 88)

STANDARD BRONZE DISC STAMPED "U.S.G.S. B.M. W-33 1940 212" LOCATED AT SOUTHWEST CORNER OF GRANT LINE ROAD & KIEFER BLVD. 3' WEST & 4' SOUTH OF FENCE CORNER 9 PACES WEST OF CENTER OF GRANT LINE RD. & 13 PACES SOUTH OF CENTER OF KIEFER BLVD. LEVELS RUN FROM U.S.G.S. DATA W-33 (APRIL 1961)

COMPUTED	MJC
DESIGNED	DVG
DRAWN	CEC
PROJ. ENGR.	CDK

REGISTERED PROFESSIONAL ENGINEER — JOSEPH A. KRO — No. 52607 — CIVIL — STATE OF CALIFORNIA

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12701 KIEFER BLVD GRADING PLANS

KIEFER LANDFILL

OVERALL ROUGH GRADING & DRAINAGE PLAN

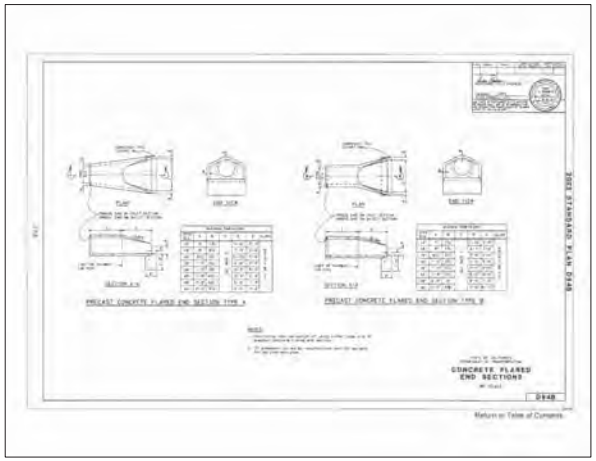
COUNTY OF SACRAMENTO, CALIFORNIA

DATE 10/08/2026

SHEET C-5

OF 9

JOB NO. 250031





PRIVATE DRAINAGE MAINTENANCE NOTE:

OWNER, OR OWNER'S DESIGNATE, AT OWNER'S DESIGNEE'S SOLE COST AND EXPENSE, SHALL MAINTAIN THE PRIVATE DRAINAGE PIPELINE IN GOOD WORKING ORDER AND REPAIR COMMENSURATE WITH THE COUNTY'S STANDARDS FOR SIMILAR DRAINAGE PIPELINES SUCH THAT WATER FLOW FREELY THROUGH THE SYSTEM AS AND WHEN WEATHER EVENTS OR OTHER SOURCES OF SURFACE WATER RUNOFF OCCUR. OWNER SHALL AT ALL TIMES TAKE ALL NECESSARY ACTION TO KEEP THE DRAINAGE PIPELINE FREE FROM DEBRIS, TRASH, FOLIAGE AND ANY OTHER OBSTRUCTION WHICH MAY DISRUPT, ALTER, IMPEDE OR CHANGE THE FLOW OF WATER. OWNER SHALL ALSO PERFORM ANY RELOCATION OF THE DRAINAGE PIPELINE PURSUANT TO THE STANDARD SPECIFICATIONS OF THE COUNTY SHOULD RELOCATION BE NECESSARY DUE TO PIPE FAILURE OR BLOCKAGE. OWNER SHALL HOLD COUNTY HARMLESS OF ANY CLAIMS ASSOCIATED WITH THE FAILURE OF THE PRIVATE DRAINAGE SYSTEM AND SHALL ASSURE THE SYSTEM IS IN GOOD REPAIR AND SERVICEABLE AT ALL TIMES.

CONSTRUCTION KEYNOTES:

1. INSTALL CONCRETE FLARED END SECTION (FES) PER CALTRANS DETAIL D94B. PROVIDE 5' x 5' GROUTED STONE APRON (4"-6" STONE SIZE), SEE DETAIL THIS SHEET.
2. PLACE 55 LF X 18" PVC SDR 35 PRIVATE STORM DRAIN OR APPROVED EQUAL @ S=0.0058.
3. CONSTRUCT 24" x 24" JENSEN DI OR APPROVED EQUAL GR = 215.30, INV = 212.30 18" THRU.
4. PLACE 263 LF X 18" PVC SDR 35 PRIVATE STORM DRAIN OR APPROVED EQUAL @ S=0.0125.
5. EXISTING SHALLOW ELECTRICAL LINES AND EXISTING LFG HEADER LINE TO REMAIN. (CONTRACTOR'S DISCRETION AND CONTRACTOR'S RESPONSIBLE TO REPLACE IF REQUIRED).
6. EXISTING FIRE HYDRANT TO BE RELOCATED OR RAISED AS NECESSARY.

NOTE

CONTRACTOR TO FIELD VERIFY LOCATION AND DEPTH OF ALL EXISTING WET AND DRY UTILITIES WITHIN THE PROJECT LIMIT PRIOR TO ROUGH GRADING.

LEGEND

SURFACE FLOW DIRECTION

OVERLAND RELEASE

NOTE: THE PROPERTY BOUNDARY LINES SHOWN IS BASED ON THE SACRAMENTO COUNTY PARCEL VIEWER INFORMATION.

DWR NOTE:

THE SACRAMENTO COUNTY DEPARTMENT OF WATER RESOURCES (WATER RESOURCES) CONSIDERS THESE PLANS LIMITED TO ROUGH GRADING ACTIVITIES ONLY. AS SUCH, THE REVIEW HAS BEEN LIMITED TO EROSION AND SEDIMENT CONTROL BEST MANAGEMENT PRACTICES AND FLOODPLAIN MANAGEMENT ONLY. WATER RESOURCES WILL REVIEW THE GRADING IN DETAIL AS PART OF THE IMPROVEMENT PLAN REVIEW. AS SUCH IT IS UNDESTOOD THAT ALL ROUGH GRADING ACTIVITIES BY THE DEVELOPER AND THEIR AGENTS ARE CONSIDERED AT-RISK.

REVISIONS

NO.	DESCRIPTION	APPD. ENGR.	DATE	APPD. E.U.	DATE

SCALE:

HORIZ. 1" = 30'

VERT. 1" = N/A

BENCH MARK BM U01B-001 STAMPED W-33

ELEV 214.07 (NAVD 88)

STANDARD BRONZE DISC STAMPED 'U.S.G.S. B.M. W-33 1940 212' LOCATED AT SOUTHWEST CORNER OF GRANT LINE ROAD & KIEFER BLVD. 3' WEST & 4' SOUTH OF FENCE CORNER 9 PACES WEST OF CENTER OF GRANT LINE RD. & 13 PACES SOUTH OF CENTER OF KIEFER BLVD. LEVELS RUN FROM U.S.G.S. DATA W-33 (APRIL 1961)

COMPUTED	MJC
DESIGNED	DVG
DRAWN	CEC
PROJ. ENGR.	CDK

REGISTERED PROFESSIONAL ENGINEER — CHRISTIN K. DESMOND — No. 19804 — CIVIL — STATE OF CALIFORNIA

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Folsom, CA 95630
phone: (916) 984-7621
web: www.mpengr.com

12701 KIEFER BLVD GRADING PLANS

KIEFER LANDFILL

ROUGH GRADING & DRAINAGE PLAN

COUNTY OF SACRAMENTO, CALIFORNIA

DATE 10/08/2026

SHEET C-6

OF 9

JOB NO. 250031

Morton & Pitalo, Inc.

CONSTRUCTION KEYNOTES:

1. INSTALL CONCRETE FLARED END SECTION (FES) PER CALTRANS DETAIL D94B, SEE DETAIL ON SHEET C-6. PROVIDE 5' X 5' GROUTED STONE APRON (4"-6" STONE SIZE).
2. PLACE 180 LF X 12" PVC SDR 35 PRIVATE STORM DRAIN OR APPROVED EQUAL @ S=0.005.
3. CONSTRUCT 24" x 24" JENSEN DI OR APPROVED EQUAL GR = 207.50, INV = 204.70 12" OUT.
4. EXISTING STORMDRAIN MANHOLE TO BE ADJUSTED TO GRADE.
5. EXISTING MONITORING WELL TO BE RELOCATED.
6. EXISTING FIRE HYDRANT TO BE RELOCATED OR RAISED AS NECESSARY.
7. EXISTING 48"Ø PRIVATE STORMWATER PIPE TO REMAIN IN PLACE.
8. EXISTING STORMWATER CATCH BASIN TO REMAIN IN PLACE.
9. EXISTING FIREWATER PIPES TO BE RELOCATED AS NECESSARY.
10. EXISTING FIRE HYDRANT TO REMAIN IN PLACE.
11. EXISTING LEACHATE LINE EXPECTED TO BE LEFT IN PLACE (UNLESS PLANS FORCE MODIFICATION).
12. EXISTING LFG PIPES - LEAVE IN PLACE.
13. EXISTING CONDENSATE TRAP TO BE ADJUSTED TO GRADE.
14. EXISTING CONDENSATE SUMP (CT-02) AIR / FORCEMAIN TO BE REGRADED OR RAISED TO GRADE.
15. PREVIOUSLY RELOCATED SHED TO REMAIN.

NOTE

CONTRACTOR TO FIELD VERIFY LOCATION AND DEPTH OF ALL EXISTING WET AND DRY UTILITIES WITHIN THE PROJECT LIMIT PRIOR TO ROUGH GRADING.

LEGEND

SURFACE FLOW DIRECTION

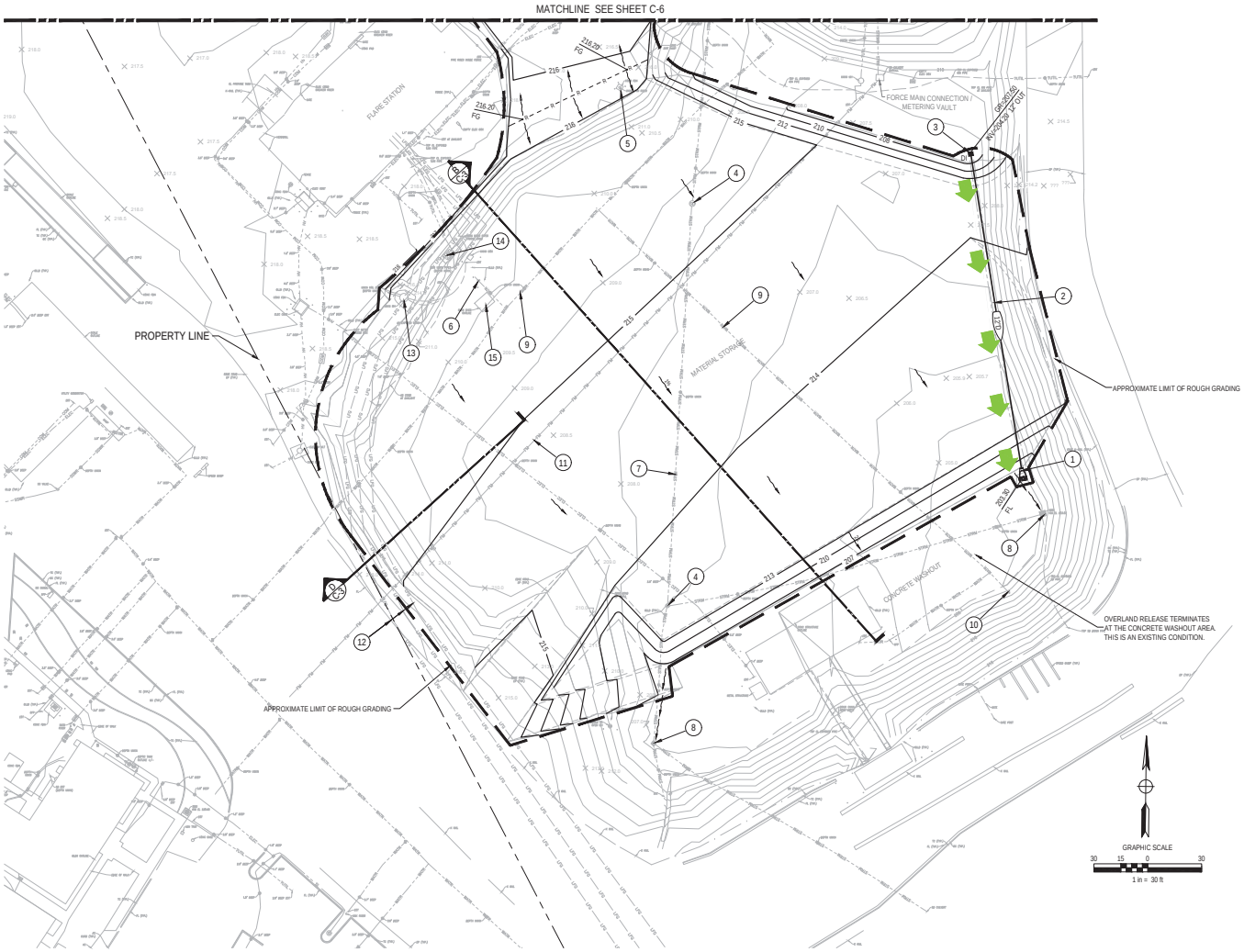
OVERLAND RELEASE

DWR NOTE:

THE SACRAMENTO COUNTY DEPARTMENT OF WATER RESOURCES (WATER RESOURCES) CONSIDERS THESE PLANS LIMITED TO ROUGH GRADING ACTIVITIES ONLY. AS SUCH, THE REVIEW HAS BEEN LIMITED TO EROSION AND SEDIMENT CONTROL BEST MANAGEMENT PRACTICES AND FLOODPLAIN MANAGEMENT ONLY. WATER RESOURCES WILL REVIEW THE GRADING IN DETAIL AS PART OF THE IMPROVEMENT PLAN REVIEW. AS SUCH IT IS UNDESTOOD THAT ALL ROUGH GRADING ACTIVITIES BY THE DEVELOPER AND THEIR AGENTS ARE CONSIDERED AT-RISK.

PRIVATE DRAINAGE MAINTENANCE NOTE:

OWNER, OR OWNER'S DESIGNATE, AT OWNER'S DESIGNEE'S SOLE COST AND EXPENSE, SHALL MAINTAIN THE PRIVATE DRAINAGE PIPELINE IN GOOD WORKING ORDER AND REPAIR COMMENSURATE WITH THE COUNTY'S STANDARDS FOR SIMILAR DRAINAGE PIPELINES SUCH THAT WATER FLOW FREELY THROUGH THE SYSTEM AS AND WHEN WEATHER EVENTS OR OTHER SOURCES OF SURFACE WATER RUNOFF OCCUR. OWNER SHALL AT ALL TIMES TAKE ALL NECESSARY ACTION TO KEEP THE DRAINAGE PIPELINE FREE FROM DEBRIS, TRASH, FOLIAGE AND ANY OTHER OBSTRUCTION WHICH MAY DISRUPT, ALTER, IMPEDE OR CHANGE THE FLOW OF WATER. OWNER SHALL ALSO PERFORM ANY RELOCATION OF THE DRAINAGE PIPELINE PURSUANT TO THE STANDARD SPECIFICATIONS OF THE COUNTY SHOULD RELOCATION BE NECESSARY DUE TO PIPE FAILURE OR BLOCKAGE. OWNER SHALL HOLD COUNTY HARMLESS OF ANY CLAIMS ASSOCIATED WITH THE FAILURE OF THE PRIVATE DRAINAGE SYSTEM AND SHALL ASSURE THE SYSTEM IS IN GOOD REPAIR AND SERVICEABLE AT ALL TIMES.



REVISIONS

NO.	DESCRIPTION	APPD. ENGR.	DATE	APPD. E.U.	DATE

SCALE:

HORIZ. 1" = 30'

VERT. 1" = N/A

BENCH MARK BM U01B-001 STAMPED W-33

ELEV 214.07 (NAVD 88)

STANDARD BRONZE DISC STAMPED 'U.S.G.S. B.M. W-33 1940 212' LOCATED AT SOUTHWEST CORNER OF GRANT LINE ROAD & KIEFER BLVD. 3' WEST & 4' SOUTH OF FENCE CORNER 9 PACES WEST OF CENTER OF GRANT LINE RD. & 13 PACES SOUTH OF CENTER OF KIEFER BLVD. LEVELS RUN FROM U.S.G.S. DATA W-33 (APRIL 1961)

COMPUTED	MJC
DESIGNED	DVG
DRAWN	CEC
PROJ. ENGR.	CDK

REGISTERED PROFESSIONAL ENGINEER — JUSTIN K. ROLLO — No. 92907 — CIVIL — STATE OF CALIFORNIA

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phone: (916) 984-7621
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12701 KIEFER BLVD GRADING PLANS

KIEFER LANDFILL

ROUGH GRADING & DRAINAGE PLAN

COUNTY OF SACRAMENTO, CALIFORNIA

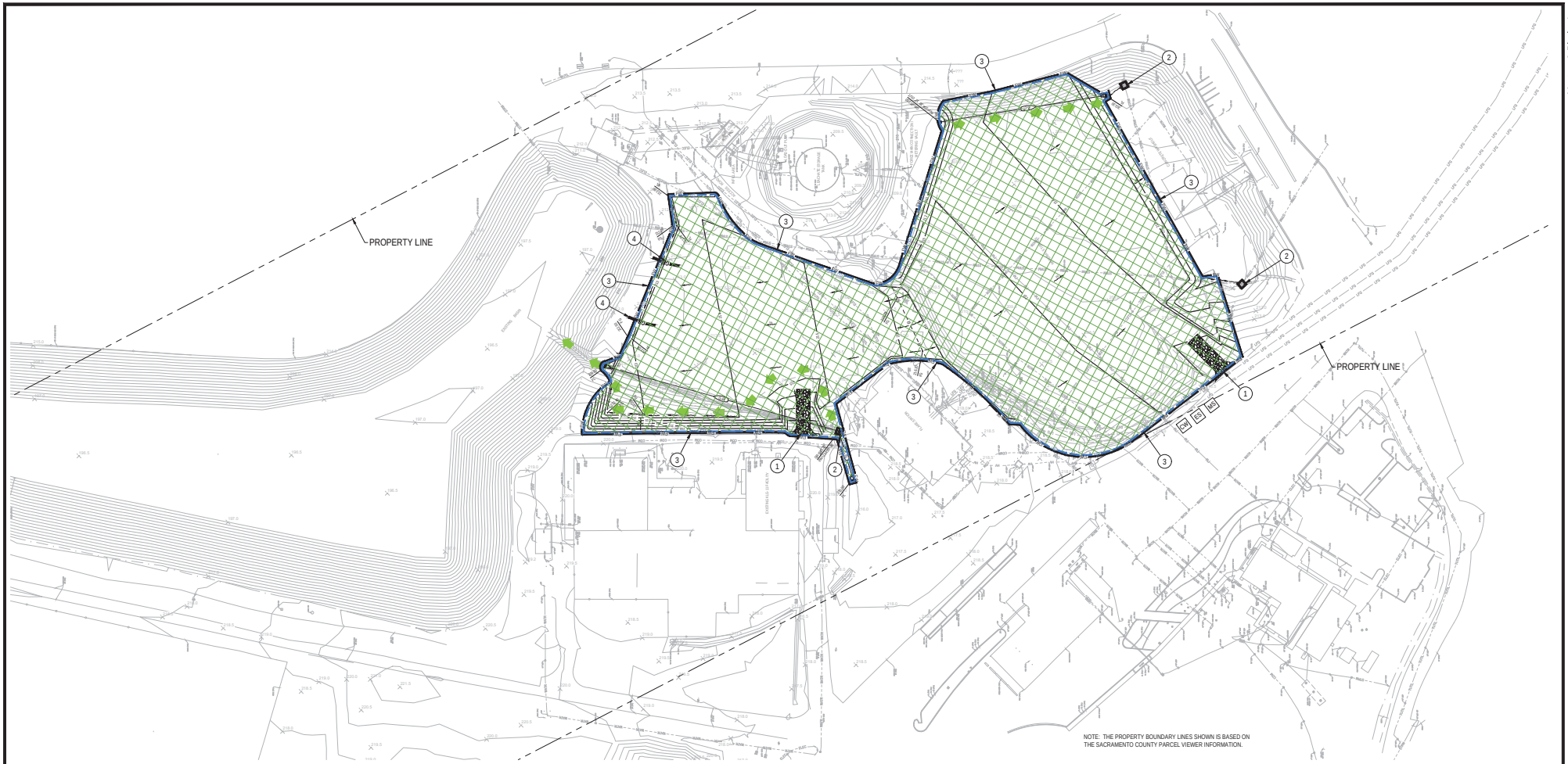
DATE 10/08/2026

SHEET C-7

OF 9

JOB NO. 250031

Morton & Pitalo, Inc.



NOTE: THE PROPERTY BOUNDARY LINES SHOWN IS BASED ON THE SACRAMENTO COUNTY PARCEL VIEWER INFORMATION.

KEYNOTE LEGEND

1. STABILIZED CONSTRUCTION SITE ACCESS PER SAC COUNTY DETAIL 11-1 ON SHEET C-9.
2. INLET SEDIMENT CONTROL (TYP TO BOTH SIDE) PER SAC COUNTY DETAIL 11-7 ON SHEET C-9.
3. FIBER WATTLE /ROLL INSTALLATION PER SAC COUNTY DETAIL 11-4 ON SHEET C-9.
4. INSTALL GRAVEL BAG BARRIER AS SHOWN.

NOTE:
HYDROSEED MIX: FIBER & BINDER AT 1500# PER ACRE, FERTILIZER 16-20-0 AT 500# PER ACRE, ANNUAL RYEGRASS AT 50# PER ACRE, OAT GRASS AT 50# PER ACRE.

SWPPP LEGEND

PROPOSED	DESCRIPTION
	INLET SEDIMENT CONTROL PER STD. DETAIL 11-7 ON SHEET C-31
CW	CONCRETE WASHOUT AREA (FIELD LOCATED) PER SAC COUNTY DETAIL 11-6 ON SHEET C-8
ES	EQUIPMENT STORAGE AREA (FIELD LOCATED)
MS	MATERIAL STORAGE AREA (FIELD LOCATED)
	SURFACE FLOW DIRECTION
	OVERLAND RELEASE
GB	GRAVEL BAG BARRIER
FW	FIBER WATTLE BARRIER
HS	HYDROSEED
	STABILIZED CONSTRUCTION ENTRANCE/EXIT

BMP INSTALLATION / MAINTENANCE SCHEDULE

PHASE OF CONSTRUCTION	EROSION AND SEDIMENT CONTROL MEASURES												
	WET SEASON					WET / DRY SEASON							
	HYDRO-SEEDING	STRAW MULCHING & TACKIFIER	SOILS BINDERS	PRESERVATION OF EXISTING VEGETATION	BLANKETS, MATS & GEOTEXTILES	FIBER WATTLES	DUST CONTROL (SEE SHEET C-34)	STORM DRAIN INLET PROTECTION	SEDIMENT BASIN (SEE SHEET C-36)	DEWATERING (SEE SHEET C-34)	STABILIZED CONSTRUCTION ENTRANCE	MATERIAL & WASTE DISPOSAL LOCATION	CONCRETE WASHOUT
PRE-GRADING				✓[2]		✓	NOTE 12	✓			✓	✓	✓
CUT & FILL ACTIVITIES	✓[2]	✓[2]	✓[2]			✓	NOTE 12		✓	NOTE 1	✓	✓	✓
UNDERGROUND WORK	✓[2]						NOTE 12		✓	NOTE 1	✓	✓	✓
CURB, GUTTER, & PAVEMENT						✓	NOTE 12	✓				✓	✓
POST CONSTRUCTION	✓[2]	✓[2]				✓	NOTE 12	✓				✓	✓

NOTE: BMPS SHALL BE PROJECT SPECIFIC AND ARE NOT LIMITED TO THE MINIMUM REQUIREMENTS SHOWN IN THE ABOVE TABLE. SOME OF THE MINIMUM REQUIREMENTS REQUIRE MORE FREQUENT INSPECTIONS (STABILIZED CONSTRUCTION ACCESS FOR EXAMPLE). VEGETATION MULCHES ARE NOT INTENDED TO BE PERMANENT AND ONCE PLANT GROWTH IS STABLE, IT DOES NOT HAVE TO BE MAINTAINED.

[1] PERIMETER PROTECTION

[2] IN CONJUCTION WITH SECONDARY MEASURE AFTER SEPTEMBER 15TH.

GRAPHIC SCALE
50 25 0 50
1 in = 50 ft

QUALIFIED SWPPP PRACTITIONER (QSP)

QUALIFIED SWPPP PRACTITIONER: _____

TELEPHONE: _____

REVISIONS NO.	DESCRIPTION	APPD. ENGR.	DATE	APPD. E.U.	DATE

SCALE:

HORIZ. 1" = 50'

VERT. 1" = N/A

BENCH MARK BM U01B-001 STAMPED W-33

ELEV 214.07 (NAVD 88)

STANDARD BRONZE DISC STAMPED 'U.S.G.S. B.M. W-33 1940 212' LOCATED AT SOUTHWEST CORNER OF GRANT LINE ROAD & KIEFER BLVD. 3' WEST & 4' SOUTH OF FENCE CORNER 9 PACES WEST OF CENTER OF GRANT LINE RD. & 13 PACES SOUTH OF CENTER OF KIEFER BLVD. LEVELS RUN FROM U.S.G.S. DATA W-33 (APRIL 1961)

COMPUTED	MJC
DESIGNED	DVG
DRAWN	CEC
PROJ. ENGR.	CDK

REGISTERED PROFESSIONAL ENGINEER — CHRISTOPHER D. KNOX — No. 52801 — CIVIL — STATE OF CALIFORNIA

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12701 KIEFER BLVD GRADING PLANS

KIEFER LANDFILL

EROSION CONTROL PLAN

COUNTY OF SACRAMENTO, CALIFORNIA

DATE 10/08/2026

SHEET C-8

OF 9

JOB NO. 250031

Morton & Pitalo, Inc.

SACRAMENTO COUNTY STANDARD EROSION AND SEDIMENT CONTROL NOTES

1. ALL EROSION AND SEDIMENT CONTROL MEASURES SHALL BE CONSTRUCTED AND MAINTAINED IN ACCORDANCE WITH THE CURRENT EDITION OF THE COUNTY OF SACRAMENTO IMPROVEMENT STANDARDS.
2. EROSION CONTROL BEST MANAGEMENT PRACTICES (BMPS) SHALL BE INSTALLED AND MAINTAINED DURING THE WET SEASON (OCTOBER 1 THROUGH APRIL 30). SEDIMENT CONTROL BMPS SHALL BE INSTALLED AND MAINTAINED YEAR-ROUND.
3. ALL DRAINAGE INLETS IMMEDIATELY DOWNSTREAM OF THE WORK AREAS AND WITHIN THE WORK AREAS SHALL BE PROTECTED WITH SEDIMENT CONTROL YEAR-ROUND. INLET PROTECTION SHALL BE REMOVED FROM THE DRAINAGE INLETS UPON ACCEPTANCE OF THE PUBLIC IMPROVEMENTS BY THE COUNTY.
4. ALL STABILIZED CONSTRUCTION ACCESS LOCATIONS SHALL BE CONSTRUCTED PER STANDARD DRAWING 11-1 WHERE CONSTRUCTION TRAFFIC ENTERS OR LEAVES PAVED AREAS. THE STABILIZED ACCESS SHALL BE MAINTAINED ON A YEAR-ROUND BASIS UNTIL THE COMPLETION OF CONSTRUCTION.
5. ALL AREAS DISTURBED DURING CONSTRUCTION BY GRADING, TRENCHING, OR OTHER ACTIVITIES, SHALL BE PROTECTED FROM EROSION DURING THE WET SEASON (OCTOBER 1 THROUGH APRIL 30). HYDROSEED, IF UTILIZED, MUST BE PLACED BY SEPTEMBER 15. HYDROSEED PLACED DURING THE WET SEASON SHALL USE A SECONDARY EROSION PROTECTION METHOD.
6. SENSITIVE AREAS AND AREAS WHERE EXISTING VEGETATION IS BEING PRESERVED SHALL BE PROTECTED WITH CONSTRUCTION FENCING. SEDIMENT CONTROL BMPS SHALL BE INSTALLED WHERE ACTIVE CONSTRUCTION AREAS DRAIN INTO SENSITIVE OR PRESERVED VEGETATION AREAS.
7. SEDIMENT CONTROL BMPS SHALL BE PLACED ALONG THE PROJECT PERIMETER WHERE DRAINAGE LEAVES THE PROJECT. SEDIMENT CONTROL BMPS SHALL BE MAINTAINED YEAR-ROUND UNTIL THE CONSTRUCTION IS COMPLETE OR THE DRAINAGE PATTERN HAS BEEN CHANGED AND NO LONGER LEAVES THE SITE.
8. EROSION AND SEDIMENT CONTROL MEASURES FOR THE PROJECT SHALL BE IN SUBSTANTIAL COMPLIANCE AT ALL TIMES WITH THE STORMWATER POLLUTION PREVENTION PLAN (SWPPP) PREPARED FOR THE PROJECT IN ACCORDANCE WITH THE STATE OF CALIFORNIA GENERAL CONSTRUCTION PERMIT. THIS PERMIT REQUIRES THAT THE SWPPP BE KEPT UP TO DATE TO REFLECT THE CHANGING SITE CONDITIONS AND THE SWPPP IS TO BE AVAILABLE ON SITE AT ALL TIMES FOR REVIEW STATE AND LOCAL INSPECTORS.
9. EFFECTIVE EROSION CONTROL BMPS SHALL BE IN PLACE PRIOR TO ANY STORM EVENTS.

ADDITIONAL EROSION AND SEDIMENT CONTROL NOTES

1. PER SACRAMENTO COUNTY IMPROVEMENT STANDARD SECTION 11-4D, SLOPES GREATER THAN 3 PERCENT SHALL BE TEMPORARILY HYDROSEEDED AND SLOPES GREATER THAN 3:1 (H:V) SHALL HAVE HYDROSEEDING AND STRAW MULCH STABILIZERS, GEOTEXTILES, PLASTIC COVERS, OR EROSION BLANKETS INSTALLED. THE PROJECT QSP SHALL PROVIDE ADDITIONAL STABILIZATION (AS NEEDED) IN ADDITION TO THE HYDROSEEDING ALREADY SHOWN ON THE PLANS.
2. THE WHOLE PARCEL WILL BE DISTURBED. AREA TO BE DISTURBED IS 3.48 ACRES.
3. STANDARD DETAILS FOR THE VARIOUS EROSION AND SEDIMENT CONTROL MEASURES CAN BE FOUND IN SECTION 11 OF THE SACRAMENTO COUNTY IMPROVEMENT STANDARDS. ADDITIONAL INFORMATION CAN ALSO BE FOUND IN THE STORM WATER POLLUTION PREVENTION PLAN PREPARED FOR THIS PROJECT.
4. PRIOR TO CONSTRUCTION, GRAVEL BAGS AND DRAINAGE INLET PROTECTION SHALL BE PLACED AT THE EXISTING DRAINAGE INLETS (DI). DRAINAGE INLET PROTECTION SHALL INCLUDE INLET SEDIMENT CONTROL BARRIER (11-7). THESE EROSION IMPROVEMENTS WILL BE REMOVED WHEN THE DI'S ARE ARE ABANDONED. FIBER WATTLES (11-4) WILL INITIALLY BE PLACED AT THE EDGE OF THE EXISTING PAVEMENT. AFTER THE ASPHALT IS SAW-CUT, THE FIBER WATTLES WILL BE MOVED ACCORDINGLY. A 20' BUFFER OF STRAW MULCHING & TACTIFIER SHALL BE PLACED ALONG THE FIBER WATTLES.
5. IF THE SITE IS DISTURBED AND WILL SIT THROUGH THE WET SEASON, THE SOIL SHALL BE STABILIZED THROUGH A ENVIRO GUARD SPRAY AND/OR STRAW MULCHING AND TACTIFIER.
6. IF VEGETATION IS DISTURBED, IT SHALL BE RE-STABILIZED.
7. DISTURBED SOIL AREAS SHALL BE HYDROSEEDED PROVIDED THAT THERE IS SUFFICIENT TIME TO ENSURE ADEQUATE VEGETATION ESTABLISMENT BEFORE THE START OF THE RAINY SEASON. IF THERE IS NOT SUFFICIENT TIME OR IF IT IS REQUIRED STRAW, WOOD OR JUTE NETTING WITH SOIL BINDER SHALL BE PROVIDED.
8. IF STOCKPILES ARE CONSTRUCTED ON THE SITE, PROVIDE EROSION AND SEDIMENT PROTECTION OF THE SLOPES BY PLACING FIBER WATTLES AT THE BOTTOM OF SLOPE. HYDROSEEDING AND BROADCAST STRAW WITH TACK COAT ON THE SLOPE.
9. LOCATIONS FOR MATERIAL AND WASTE HAVE BEEN SHOWN ON THE PLANS. MATERIAL SHALL ALSO BE STORED IN THE EXISTING STORAGE BUILDING, IF REQUIRED.
10. POST CONSTRUCTION PHASE REQUIRES STABILIZATION OF ALL DISTURBED SOILS, ROUGH GRADING PHASE WILL CONSIST OF HYDROSEEDING THE SITE FOR STABILIZATION. THIS WILL PROTECT THE SITE UNTIL SUCH TIME FINE GRADING ACTIVITIES BEGIN .
11. ALL EROSION CONTROL BMPs SHALL BE EVALUATED AT THE BEGINNING OF THE WET SEASON BY PROJECT QSP; A SWPPP AMENDMENT SHALL BE PREPARED AS NEEDED.
12. SECTION 11 OF THE SACRAMENTO COUNTY IMPROVEMENT STANDARDS CONTAINS STANDARD DETAILS FOR VARIOUS EROSION AND SEDIMENT CONTROL MEASURES. IF REFERENCE IS MADE TO THESE DRAWINGS, IT IS NOT NECESSARY TO REPLICATE THE DRAWINGS ON THE EROSION AND SEDIMENT CONTROL PLANS.
13. ALL INLETS SHALL BE MARKED WITH PERMANENT STORM DRAIN MESSAGE "NO DUMPING - FLOWS TO CREEK" CONSISTENT WITH SECTION 9-14q OF THE SACRAMENTO COUNTY IMPROVEMENT STANDARDS.

DUST CONTROL NOTES

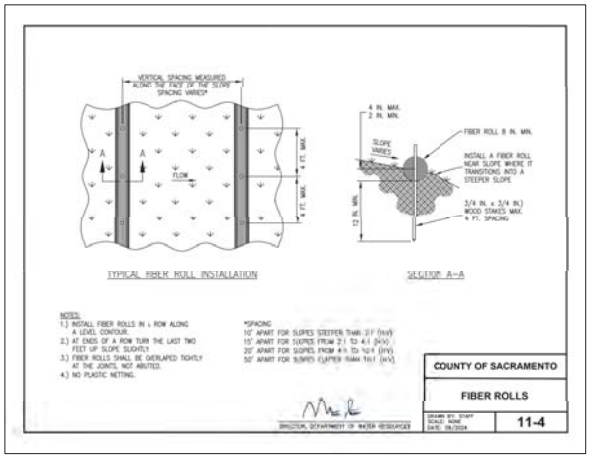
1. MAINTAIN A GRAVELED TRACK AT ALL PROJECTS ENTRYWAYS TO REMOVE MUD AND DIRT FROM VEHICLES LEAVING THE SITE.
2. WATER ALL DISTURBED EARTH SURFACES THROUGHOUT CONSTRUCTION TO CONTROL DUST EROSION.
3. FOR ANY DISTURBED PORTIONS, PERMANENT SOIL STABILIZATION MEASURES (E.G., PAVING OR LANDSCAPE PLANTING) SHALL BE IMPLEMENTED IMMEDIATELY FOLLOWING THE COMPLETION OF CONSTRUCTION OF ANY PORTION OF THE SITE WHERE CONSTRUCTION HAS OCCURRED.
4. ALL INACTIVE FILL STOCKPILES SHALL BE SEEDED WITH NATIVE GRASSES TO CONTROL DUST EROSION.
5. WATER ALL DISTURBED EARTH SURFACES THROUGHOUT CONSTRUCTION TO CONTROL DUST EROSION. THE COUNTY SHALL HAVE AUTHORITY TO STOP ALL GRADING OPERATIONS, IF, IN OPINION OF COUNTY STAFF, INADEQUATE DUST CONTROL MEASURES ARE BEING PRACTICED, OR EXCESSIVE WIND CONDITIONS CONTRIBUTE TO FUGITIVE DUST EMISSIONS. THE CONTRACTOR SHALL USE A WATER TRUCK TO MAINTAIN DUST CONTROL AT ALL TIMES.

STORMWATER DISCHARGE OPERATION NOTES

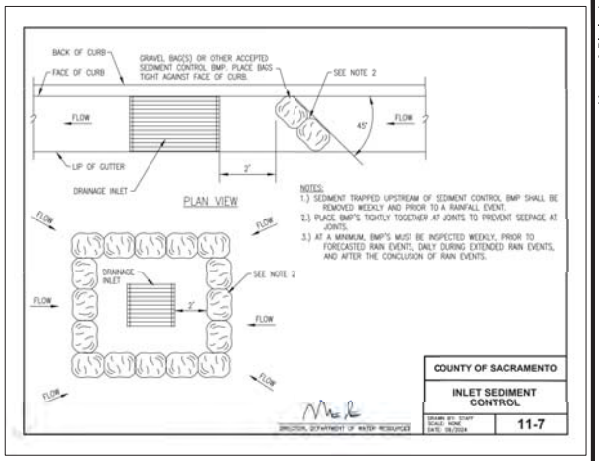
1. IT'S NOTED THAT COLLOIDAL SOILS ARE PRESENT ON-SITE, AND ANY STORM WATER OPERATIONS WILL WORK TO MITIGATE SUSPENDED SOILS FOUND IN DISCHARGED STORM WATER TO THE SATISFACTION OF THE COUNTY OF SACRAMENTO AND THE STATE OF CALIFORNIA SWPPP REQUIREMENTS.
2. DISCHARGE WILL NOT EXCEED BASIN PLAN LIMITS AS STATED IN TABLE 1. PAGE 16 OF THE STATE OF CALIFORNIA STORM WATER PROGRAM CONSTRUCTION GENERAL PERMIT (SEE TABLE THIS SHEET). BACKGROUND/NATURAL TURBIDITY WILL BE ESTABLISHED.
3. IF THE WATER DOES NOT MEET REGION 5 - CENTRAL VALLEY REGIONAL WATER QUALITY CONTROL BOARD REQUIREMENTS AND COLLOIDAL SOILS ARE ENCOUNTERED, THEN AN ADVANCED TREATMENT SYSTEM (ATS) WILL BE REQUIRED PRIOR TO DISCHARGE (SEE SHEET C-10 FOR ATS). THE APPROPRIATE COURSE OF ACTION SHALL BE DETERMINED BY THE QSP AND COORDINATED CLOSELY WITH THE COUNTY INSPECTOR.

REGIONAL WATER BOARD BASINS PLANS, WATER QUALITY OBJECTIVES FOR TURBIDITY:

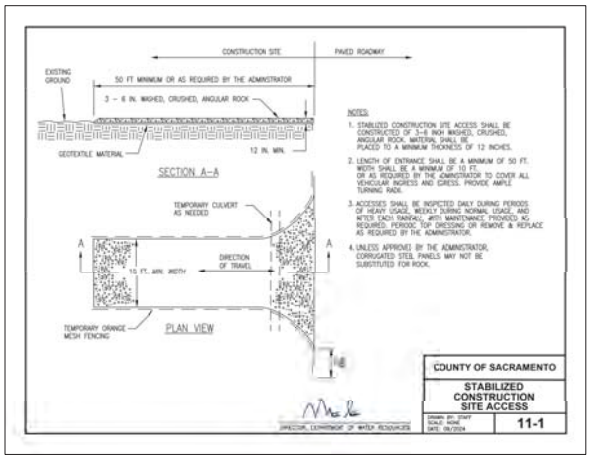
REGIONAL WATER BOARD	WQ OBJECTIVE	BACKGROUND/NATURAL TURBIDITY	MAXIMUM INCREASE
NOTE 5	BASED ON BACKGROUND	0-5 NTU 5-50 NTU 50-100 NTU >100 NTU	1 NTU 20% 10 NTU 10%



DETAIL 1



DETAIL 2



DETAIL 3

PROJECT BEST MANAGEMENT PRACTICES (BMP)		BMP MAINTENANCE SCHEDULE	
WET / DRY SEASON	BMP	INSPECTION FREQUENCY*	MAINTENANCE*
BOTH	STABILIZED CONSTRUCTION ENTRANCE	DAILY	REPLACE GRAVEL AS NECESSARY, REMOVE EXCESSIVE SOIL ACCUMULATION, SWEEP ADJACENT STREETS DAILY
BOTH	FIBER ROLL	PRIOR TO AND AFTER RAIN EVENT, AND DURING EXTENDED RAIN EVENTS	REPAIR OR REPLACE SPLIT, TORN, UNRAVELING OR SLUMPING ROLLS. IN ACTIVE CONSTRUCTION, RETURN ROLLS THAT HAVE BEEN MOVED TO PROPER PLACES AT THE END OF EACH WORKDAY DURING THE WET SEASON.
WET	HYDROSEEDING	AS NEEDED	MAINTAIN ALL SLOPES TO PREVENT EROSION. INSPECT FOR EROSION, RE-SEED, FERTILIZE, AND MULCH DURING THE PLANTING SEASON.
BOTH	STRAW MULCH	AFTER EACH RAIN EVENT	REAPPLY MULCH AND TACKIFIER AS NECESSARY. SLOPES MAINTAINED AND REPAIRED IMMEDIATELY AFTER RAIN EVENT.
BOTH	INLET SEDIMENT CONTROL	WEEKLY, AND PRIOR TO AND AFTER RAIN EVENT	MATERIAL SPILLING FROM SEDIMENT CONTROL DEVICES SHALL BE CLEANED UP AND REPAIRED OR REPLACED IMMEDIATELY. DISPOSE OF SEDIMENT PROPERLY.
BOTH	CONCRETE WASHOUTS	DAILY	MINIMUM OF 4" FREEBOARD. HARDENED CONCRETE SHALL BE REMOVED AND DISPOSED OF PROPERLY. WASHOUT SHALL BE CLEANED WHEN THE WASTE VOLUME REACHES 75% OF CAPACITY.
BOTH	CONCRETE WASHOUTS	DAILY	IRRIGATE TO MAINTAIN VEGETATION YEAR ROUND. IRRIGATION SCHEDULE AND MAINTENANCE SPECIFIED IN PLANS

BMP INSTALLATION / MAINTENANCE SCHEDULE

PHASE OF CONSTRUCTION	EROSION AND SEDIMENT CONTROL MEASURES										
	WET SEASON					WET / DRY SEASON					
	HYDRO-SEEDING	STRAW MULCHING & TACKIFIER	SOILS BINDERS	PRESERVATION OF EXISTING VEGETATION	BLANKETS, MATS & GEOTEXTILES	FIBER WATTLES	DUST CONTROL	STORM DRAIN INLET PROTECTION	SEDIMENT BASIN	STABILIZED CONSTRUCTION ENTRANCE	MATERIAL & WASTE DISPOSAL LOCATION
PRE-GRADING				✓[1]	✓[3]	✓	NOTES 1-4	✓		✓	✓
CUT & FILL ACTIVITIES	✓[2]	✓[2]	✓[2]		✓[3]	✓	NOTES 1-4		✓	✓	✓
POST-ROUGH GRADING	✓[2]	✓[2]			✓[3]	✓	NOTES 1-4	✓			✓

NOTE: BMPS SHALL BE PROJECT SPECIFIC AND ARE NOT LIMITED TO THE MINIMUM REQUIREMENTS SHOWN IN THE ABOVE TABLE. THE ABOVE BMPS SHOULD BE INSPECTED WEEKLY, BEFORE AND AFTER SIGNIFICANT RAINFALL. VEGETATION MULCHES ARE NOT INTENDED TO BE PERMANENT AND ONCE PLANT GROWTH IS STABLE, IT DOES NOT HAVE TO BE MAINTAINED.
[1]PERIMETER PROTECTION
[2]IN CONJUNCTION WITH SECONDARY MEASURE AFTER SEPTEMBER 15TH.
[3]WHEN CHANNELS ARE CONSTRUCTED DURING THE WET SEASON (OCT 1 - APR 30), THE CHANNEL SIDES AND BOTTOMS SHALL BE PROTECTED WITH EROSION CONTROL BLANKETS PER SACRAMENTO COUNTY IMPROVEMENT STANDARD 11-9.

TOTAL DISTURBED AREA = ~ 3.48 ACRES

QUALIFIED SWPPP PRACTITIONER (QSP)

QUALIFIED SWPPP PRACTITIONER: _____

TELEPHONE: _____

REVISIONS NO.	DESCRIPTION	APPD. ENGR.	DATE	APPD. E.U.	DATE

SCALE:
HORIZ. 1" = N/A
VERT. 1" = N/A

BENCH MARK BM U01B-001 STAMPED W-33
ELEV 214.07 (NAVD 88)
STANDARD BRONZE DISC STAMPED 'U.S.G.S. B.M. W-33 1940 212' LOCATED AT SOUTHWEST CORNER OF GRANT LINE ROAD & KIEFER BLVD. 3' WEST & 4' SOUTH OF FENCE CORNER 9 PACES WEST OF CENTER OF GRANT LINE RD. & 13 PACES SOUTH OF CENTER OF KIEFER BLVD. LEVELS RUN FROM U.S.G.S. DATA W-33 (APRIL 1961)

COMPUTED	MJC
DESIGNED	DVG
DRAWN	CEC
PROJ. ENGR.	CDK

REGISTERED PROFESSIONAL ENGINEER — JOSEPH KNOX DAVIS — No. C58547 — CIVIL — STATE OF CALIFORNIA

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12701 KIEFER BLVD GRADING PLANS

KIEFER LANDFILL

EROSION CONTROL NOTES & DETAILS

COUNTY OF SACRAMENTO, CALIFORNIA

DATE 10/08/2026
SHEET C-9
OF 9

JOB NO. 250031

Morton & Pitalo, Inc.

Dwg: X:\2025\25-003.00 (KIEFER) LANDFILL\PROJECT\DWG\EXHIBIT\KIEFER\25003-C10(EROSION).DWG | Saved: 08-29-2025 49pm CA\BRIEBA

Todd Smith, Planning Director
Planning and Environmental Review

Troy Givans, Director
Department of Community Development

Mitigated Negative Declaration

Pursuant to Title 14, Division 6, Chapter 3, Article 6, Sections 15070 and 15071 of the California Code of Regulations and pursuant to the Procedures for Preparation and Processing of Environmental Documents adopted by the County of Sacramento pursuant to Sacramento County Ordinance No. SCC-116, the Environmental Coordinator of Sacramento County, State of California, does prepare, make, declare, publish, and cause to be filed with the County Clerk of Sacramento County, State of California, this Mitigated Negative Declaration re: The Project described as follows:

1. **Control Number**: PLER2024-00137

2. **Title and Short Description of Project**: Kiefer Landfill Gas Utilization Project

   Kiefer Landfill Generating III, LLC is proposing to construct a renewable natural gas (RNG) plant with a capacity of 8,000 standard cubic feet per minute (scfm) at Kiefer Landfill and a pipeline connecting the plant to existing Pacific Gas & Electric (PG&E) natural gas pipelines in Sacramento County. The RNG plant would process landfill gas to meet air quality standards and produce pipeline-quality natural gas (i.e., primarily methane) by removing moisture and impurities. The proposed project would also construct a new pipeline to transfer the pipeline-quality RNG from the plant to existing PG&E pipeline infrastructure, with two route options under evaluation.

3. **Assessor's Parcel Number(s)**: RNG Plant: 126-0090-020-0000 and 126-0090-021-0000; Pipeline: 126-0090-021-0000, 126-0090-020-0000, 067-0030-078-0000, 067-0030-079-0000, and 067-2370-018-0000

4. **Location of Project**: Kiefer Landfill: 12701 Kiefer Boulevard, Sloughhouse, CA 95683, approximately 0.6 miles southeast of the intersection of Grant Line Road and Kiefer Boulevard

   Pipeline Routes would be located within the public rights-of-way and/or private easements and run northwest from Kiefer Landfill along Kiefer Boulevard either to the intersection of Kiefer Boulevard/Rancho Cordova Parkway or to the intersection of Kiefer Boulevard/Sunrise Boulevard, then north along Sunrise Boulevard where it would terminate in the vicinity of the intersection of Sunrise Boulevard/Douglas Road. Either a compressor station would be constructed near the intersection of Douglas Road and Sunrise Boulevard to connect existing PG&E distribution and transmission pipelines or a metering and regulating (M&R) station may be constructed in the vicinity of the PG&E interconnect on Douglas Boulevard depending on the pipeline route (APN 067-0030-079-0000 or 067-2370-018-0000).

5. **Project Applicant**: Kiefer Landfill Generating III, LLC

6. Said project will not have a significant effect on the environment for the following reasons:

   a. It will not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory.

   b. It will not have the potential to achieve short-term, to the disadvantage of long-term, environmental goals.

   c. It will not have impacts, which are individually limited, but cumulatively considerable.

   d. It will not have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly.

7. As a result, thereof, the preparation of an environmental impact report pursuant to the Environmental Quality Act (Division 13 of the Public Resources Code of the State of California) is not required.

8. The attached Initial Study has been prepared by the Sacramento County Planning and Environmental Review Division in support of this Mitigated Negative Declaration. Further information may be obtained by contacting the Planning and

Environmental Review Division at 827 Seventh Street, Room 225, Sacramento, California, 95814, or phone (916) 874-6141

Julie Newton
Environmental Coordinator
County of Sacramento, State of California

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Appendix B: Biological Resource Evaluation

Appendix C: Aquatic Resource Delineation Report

Appendix D: Special Status Wildlife Habitat Assessment

Appendix E: Rare Plant Survey Report

Appendix F: Cultural Resources Technical Report

Appendix G: Noise Study

Appendix H: Native American Heritage Commission and Tribal Contacts

Due to the length, Appendices A through H are available to view at Sacramento County Planning and Environmental Review, 827 7th Street Room 225, Sacramento, CA 95814 during normal business hours, or online at http://planningdocuments.saccounty.gov

The direct link is:

https://planningdocuments.saccounty.gov/ViewProjectDetails.aspx?ControlNum=PLER2024-00137

COUNTY OF SACRAMENTO
PLANNING AND ENVIRONMENTAL REVIEW
INITIAL STUDY

PROJECT INFORMATION

PROJECT TITLE: Kiefer Landfill Gas Utilization Project

CONTROL NUMBER: PLER2024-00137

LEAD AGENCY: County of Sacramento
827 7th Street, Room 225
Sacramento, CA 95814

PROJECT SPONSOR: Kiefer Landfill Generating III, LLC
Andrew Petric, Senior Environmental Services Project Manager
700 Universe Boulevard
Juno Beach, FL 33408

LOCATION:

Kiefer Landfill: 12701 Kiefer Boulevard, Sloughhouse, CA 95683, approximately 0.6 miles southeast of the intersection of Grant Line Road and Kiefer Boulevard

Pipeline Routes would be located within the public rights-of-way and/or private easements and run northwest from Kiefer Landfill along Kiefer Boulevard either to the intersection of Kiefer Boulevard/Rancho Cordova Parkway or to the intersection of Kiefer Boulevard/Sunrise Boulevard, then north along Sunrise Boulevard where it would terminate in the vicinity of the intersection of Sunrise Boulevard/Douglas Road. Either a compressor station would be constructed near the intersection of Douglas Road and Sunrise Boulevard to connect existing Pacific Gas & Electric (PG&E) distribution and transmission pipelines or a metering and regulating (M&R) station may be constructed in the vicinity of the PG&E interconnect on Douglas Boulevard depending on the pipeline route (APN 067-0030-079-0000 or 067-2370-018-0000).

ASSESSOR'S PARCEL NUMBER: RNG Plant: 126-0090-020-0000 and 126-0090-021-0000; Pipeline: 126-0090-021-0000, 126-0090-020-0000, 067-0030-078-0000, 067-0030-079-0000, and 067-2370-018-0000

GENERAL PLAN DESIGNATION: Sacramento County: PQP (Public & Quasi-Public), City of Rancho Cordova: CMU (Commercial Mixed Use)

ZONING: Sacramento County: AG-80 (Agriculture 80 acres), City of Rancho Cordova: GC (General Commercial)

PROJECT DESCRIPTION

PROJECT OVERVIEW AND BACKGROUND

Kiefer Landfill Generating III, LLC is proposing to construct a renewable natural gas (RNG) plant at Kiefer Landfill and a pipeline connecting the plant to existing PG&E natural gas pipelines in Sacramento County **(Plate IS- 1** and **Plate IS- 2**). Currently, landfill gas at Kiefer Landfill is being collected and combusted at engine plants known as Kiefer Landfill Generating I (KLG-1) and Kiefer Landfill Generating II (KLG-2) located within two contiguous buildings to produce electricity supplied to the Sacramento Municipal Utility District (SMUD). KLG-1 includes three 3-megawatt (MW) engines and KLG-2 has two 3-MW engines which operate 24 hours a day, 365 days a year, except for planned and unplanned outages. Landfill gas that is collected during an outage, or landfill gas that is collected in excess of the capacity of the KLG-1 and KLG-2 engine plants is combusted in two existing enclosed landfill gas flares. Kiefer Landfill also includes street sweepers, a diesel engine standby emergency generator, and a gasoline dispensing facility, not affiliated with Kiefer Landfill Generating III, LLC, which would not change as a result of the proposed project.

DESCRIPTION OF PROJECT

RENEWABLE NATURAL GAS PLANT

The Kiefer Landfill Gas Utilization Project (proposed project) would consist of the construction of an RNG plant at Kiefer Landfill with a capacity of 8,000 standard cubic feet per minute (scfm) (**Plate IS- 3**). The RNG plant would process landfill gas to meet Sacramento Metropolitan Air Quality Management District (SMAQMD) air quality standards and produce pipeline-quality natural gas (i.e., primarily methane) by removing moisture and impurities such as hydrogen sulfide (H_2S), carbon dioxide (CO_2), volatile organic compounds (VOCs), oxygen (O_2), and nitrogen (N_2).

PROCESS OVERVIEW:

- **Sulfur Removal:** Landfill gas would be pulled to the RNG Plant using a blower skid. The landfill gas would enter a closed-loop system whereby H_2S is converted into elemental sulfur and captured in an activated carbon media. Spent media would be changed out and disposed of at an approved facility on an annual basis or as needed.

- **Compression:** Landfill gas that is treated for H_2S is then compressed to increase pressure for further treatment.

- **Particulate Control:** The gas would undergo filtration and dewatering to meet Clean Air Act standards (Subpart AAAA[1]).

- **Impurity Removal:** CO_2, VOCs, O_2, and N_2 would be removed to enhance methane concentration. Some gas may be recycled for further treatment.

[1] 40 CFR Part 63 Subpart AAAA, National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills

- **Waste Gas Handling:** Process waste gases from impurity removal would be combusted in a thermal oxidizer, supplemented with natural gas for complete combustion.

- **Off-Specification Gas Handling:** Gas that does not meet pipeline specifications would be directed to two new enclosed off-specification flares.

- **Condensate Management:** Condensate from the process would be routed to the landfill's existing leachate management system for disposal.

The resulting product would be pipeline-quality RNG ready for transport to the PG&E pipeline interconnect (**Plate IS- 4**).

Pipeline

Implementation of the proposed project would also consist of a new pipeline and compressor station to transfer the pipeline-quality RNG from the plant to existing PG&E pipeline infrastructure (**Plate IS- 5** and **Plate IS- 6**). Two route options located within the public rights-of-way and/or private easements are under consideration:

Option 1 – Distribution Connection Route (Base-case):

One 12-inch diameter steel pipeline, approximately 2.2 miles in length, would be installed to both accept injected RNG and accommodate a return (e.g., buy-back) natural gas. The pipeline would exit the landfill and run northwest along Kiefer Boulevard, connecting to an existing PG&E distribution pipeline near the intersection of Kiefer Boulevard and Rancho Cordova Parkway. A compressor station and associated pipelines would be constructed near the intersection of Douglas Road and Sunrise Boulevard to connect the new pipeline to existing PG&E distribution and transmission pipelines. The compressor station would occupy an area up to approximately 25,000 square feet (sf) and include vehicle access as well as compressor(s) and associated mechanical and electrical equipment. A noise-suppressing enclosure would be installed at the compressor(s) and a block wall or fencing installed around the compressor station perimeter to provide noise abatement, visual screening, and security. Two locations for the compressor station are under consideration on private property; a) an undeveloped General Commercial zoned parcel directly south of Douglas Road and approximately 800 feet west of Sunrise Boulevard and b) an undeveloped General Commercial zoned parcel east of Sunrise Boulevard between Herodian Drive and Douglas Road, directly south of a Chevron Extra Mile gas station. A temporary construction laydown yard would be located adjacent to the compressor station site, on commercial/previously disturbed land. Additional pipelines from the compressor station to Douglas Road would connect to the existing PG&E transmission and distribution pipelines. An M&R station would be constructed at Kiefer Landfill adjacent to the RNG plant, to measure and control gas flow before entering the PG&E network.

Note, the optional compressor station site located east of Sunrise Boulevard, between Herodian Drive and Douglas Road, is no longer being considered by the applicant as part of the proposed project. However, the analysis of the optional compressor station site has been retained for informational purposes and reflects greater impacts than would occur under the proposed project. Accordingly, the proposed project would be expected to result in fewer potential impacts than those analyzed herein.

OPTION 2 – TRANSMISSION CONNECTION ROUTE:

An estimated single 6-inch diameter steel RNG pipeline, approximately 5.6 to 6.6 miles in length, would be installed.[2] The pipeline would exit the landfill, run northwest along Kiefer Boulevard, then run north at Sunrise Boulevard, connecting to the existing PG&E transmission pipeline along Douglas Road near the intersection of Douglas Road and Sunrise Boulevard. Along Sunrise Boulevard, the pipeline would run along the east side of the Folsom Canal and either:

- **Option 2A:** Run east and north along the commercial/residential area northeast of Folsom Canal.
- **Option 2B:** Run along the west side of the commercial/residential area adjacent to Folsom Canal.

Under this option, the compressor station would not be constructed and an M&R station would be constructed at the PG&E interconnect. An alternate M&R location would be located east of Sunrise Boulevard on an undeveloped commercial parcel between Herodian Drive and Douglas Road, directly south of the Chevron Extra Mile gas station. A temporary construction laydown yard would be located adjacent to the compressor station site, on commercial/previously disturbed land. Additional pipeline from the M&R station to Douglas Road would connect to the existing PG&E transmission pipeline. Additionally, a steel natural gas supply pipeline would be constructed to connect the RNG facility to the existing PG&E distribution pipeline near the intersection of Kiefer Boulevard and Rancho Cordova Parkway.

A contingency option for the pipeline further west along Douglas Road, just west of Eagles Nest Road, was also considered (as part of Option 2). For consistency with the technical reports, this alignment is also included as part of the CEQA impact evaluation.

CONSTRUCTION

RNG PLANT

Construction of the RNG Plant would include as-needed demolition and rerouting of existing utilities, site preparation (e.g., cut and fill, soil hauling, and rough and fine grading), foundation work, underground duct and pipeline work, building construction, equipment installation, paving and finish work.

Construction is anticipated to be completed in approximately 14 months, starting in January 2027 and completing in March 2028 with commercial operations expected to initiate June 2028. Construction would typically occur from 7:00 a.m. to 6:00 p.m., Monday through Friday (except on federal holidays). Typical equipment necessary for construction of the proposed project include dump trucks, forklift, crane, grader, and trucks for hauling, transport, waste removal, and dust control. Equipment numbers may vary depending on actual construction requirements and certain equipment would not be used during all phases of construction.

[2] For purposes of the air quality and greenhouse gas analyses (see Sections IV, IX, and Appendix A of the Initial Study), the maximum 6.6-mile pipeline length was assumed.

Additionally, during the peak of construction activity, it is anticipated that the number of on-site daily workers would generally range between 100 and 150. The peak number of daily off-site truck trips would be approximately 100 during the 14 months of construction.

Pipeline

Construction for the RNG pipelines would consist mostly of open-cut construction methods within a 100-foot-wide limit of disturbance. It is anticipated that actual trench widths would be no greater than 36 inches wide and 48 inches deep. Trench excavation material would be stored adjacent to the trench and used as backfill, if appropriate. Imported engineering-grade fill material may also be used for pipeline backfill. Excess soils, if any, would be properly managed (re-used or landfilled) by the construction contractor, as appropriate.

Additionally, horizontal directional drilling (HDD) methods would be employed at roadway crossings, commercial/residential areas, and along environmentally sensitive areas, such as streams and other aquatic resources. HDD entry and exit points would be at least 150 feet from aquatic resources.

Gas, electric, water, sewer, and communication facilities are located along the project alignment and may require adjustment or relocation. Specifically, there are several SMUD overhead lines with fiber optic communication cables, in addition to underground facilities crossing along or through the project alignment. Utility relocation coordination will be an on-going effort as the project progresses and conflicts are identified and resolved with utility companies. Utility relocation will not result in an increase to service nor are prolonged service interruptions anticipated.

The primary pipeline construction laydown and staging areas would be situated at Kiefer Landfill in an area regularly used for landfill staging and storage. If secondary construction staging and laydown areas along the pipeline route are needed, they would be placed at locations more than 250 feet from aquatic resources.

Construction of the pipeline, compressor, and M&R station is anticipated to begin in October 2027 and be completed in approximately 6 months by March 2028 with the potential for seasonal limitations associated with nesting birds. During the peak of construction activity, it is anticipated that the number of daily workers would generally range between 50 and 100. The peak number of daily off-site truck trips would be approximately 50 during the 6 months for backfilling of the pipeline.

Operation

Upon completion of construction, the RNG plant would undergo a commissioning period during which plant equipment, control systems, and gas treatment processes would be tested, verified, calibrated, and adjusted as necessary to achieve design performance specifications. Commissioning is anticipated to occur over approximately 4 months. During this period, process waste gas generated by the gas upgrading system would be combusted in the thermal oxidizer and any off-specification RNG would be combusted in the two new enclosed off-specification flares. Emissions associated with commissioning activities would be limited to permitted combustion sources, including the thermal oxidizer and enclosed off-specification flares. The RNG plant is designed as a closed-loop gas treatment system and does not include routine venting of landfill gas or process gas to the atmosphere. The facility would include pressure

relief and overpressure protection devices as required by applicable engineering codes and safety regulations; however, these devices are intended solely for emergency equipment protection and would not be part of routine plant operations. Following successful commissioning, RNG gas, which meet PG&E quality specifications, would be introduced into the PG&E natural gas pipeline system for beneficial use.

The proposed RNG plant would be the primary use of the landfill gas at project completion with the option of operating up to two of the existing engines at the existing plants which would be converted from running on landfill gas to running on natural gas. The existing engines converted to operate on natural gas would be used to provide electricity to support operation of the RNG plant. The RNG plant, landfill gas collection and control system (GCCS), landfill flares, electrical generation equipment, and associated utility infrastructure constitute critical landfill infrastructure that supports continued compliance with landfill gas collection, control, monitoring, and environmental protection requirements. During operations, the RNG plant may periodically undergo planned outages for preventive maintenance (anticipated approximately twice annually) as well as occasional unplanned outages for equipment repair or system troubleshooting. During such events, landfill gas would continue to be collected and managed through the existing ~~Landfill Gas Collection and Control System (~~GCCS~~)~~. Landfill gas that cannot be processed by the RNG plant would be diverted to the existing permitted landfill flares (Flares No. 1 and No. 2) for combustion. Flare No. 1 and Flare No. 2 are intended to operate only during planned or unplanned short-term outages of the RNG plant and are not intended for continuous operation during normal project conditions. During normal operation, the RNG plant is designed to process the available landfill gas, with the flares serving as backup gas control devices. Because the frequency and duration of planned and unplanned outages cannot be predicted, specific annual operating percentages cannot be established. Therefore, the air quality analysis conservatively assumes operation of Flare No. 1 and Flare No. 2 for up to 20 percent of the year. The project's Potential to Emit (PTE) analysis conservatively assumes operation of the landfill flares approximately 20 percent of the time, which encompasses anticipated startup, shutdown, maintenance, transition, and contingency operating conditions.

During the peak operation day, it is anticipated that seven employees would be employed at the RNG plant. The carbon media change out for the sulfur treatment would occur approximately once a year with an additional 10 employees on site to facilitate the change-out. Major maintenance and service for the RNG plant is anticipated to occur with up to two planned outages per year; however, other maintenance activities would take place, as needed, during planned and unplanned outages.

Transitions between RNG plant operations and landfill flare operations would be conducted in accordance with established operating procedures. Supervisory Control and Data Acquisition (SCADA) systems would provide continuous monitoring of gas flows, pressures, equipment status, and alarm conditions. During planned or unplanned RNG plant outages, landfill personnel would place the landfill flares in service and adjust gas routing valves as necessary to direct landfill gas to the permitted flare system. During these transitions, continuous vacuum within the landfill gas collection system would be maintained and landfill gas would remain under active collection and control, preventing uncontrolled landfill gas releases during both routine and non-routine operating conditions. Flare No. 1 and Flare No. 2, together with their associated blower system, are capable of maintaining the required landfill gas collection system operating conditions, including adequate vacuum and negative pressure, during RNG plant outages. This is consistent with the current landfill operating configuration, under which the flare system provides gas control during shutdowns of the existing landfill gas-to-electricity facility. The proposed project would not modify the flare system configuration or reduce its operational

capacity. As documented in Scenario 4 of the January 22, 2026 memorandum, the flare system is capable of operating continuously, if necessary, while maintaining compliance with landfill gas collection and control requirements. An unplanned power outage affecting the RNG plant would not affect operation of Flare No. 1 and Flare No. 2 because the RNG plant is owned and operated by Kiefer Landfill Generating III, LLC, while the flare system is owned and operated independently by the County of Sacramento Department of Waste Management and Recycling. During planned or unplanned RNG plant outages, landfill gas would be redirected to the existing flare system using established landfill operating procedures to maintain continuous gas collection and control. Because the flare system is an existing component of the landfill gas collection system, no new operational impacts to the gas collection system are anticipated during these transitions.

Operational monitoring, alarm systems, and established operating procedures would be used during startup, shutdown, maintenance, commissioning, and upset conditions to ensure continued compliance with applicable landfill gas control requirements, air district permit conditions, and air quality regulations. Under both routine and non-routine operating scenarios, landfill gas would either be processed through the RNG plant or combusted in permitted control devices, thereby maintaining continuous landfill gas control and minimizing emissions. The operational emissions analysis presented in this MND includes emissions from applicable operational sources that would remain onsite following project implementation, including the converted engines, internal combustion engine, existing flares (operated under the conservative 20-percent annual assumption), street sweepers, and other applicable operational equipment associated with the landfill.

SURROUNDING LAND USES AND SETTING

The RNG plant is located within the developed interior portion of Kiefer Landfill, on a previously disturbed lot situated among existing landfill-gas-to-energy facilities (KLG-1 and KLG-2). The RNG plant site is characterized by disturbed soils, graded surfaces, and ruderal vegetation typical of long-established landfill operations.

The landfill property is surrounded by more than 3,000 acres of buffer lands maintained in agricultural and habitat uses, which provide physical separation from rural residential development in surrounding areas. Land uses immediately surrounding the landfill consist of agricultural land, open space, and undeveloped buffer areas, with no urban development in the immediate vicinity of the plant site. The RNG plant footprint itself is contained within an area already used for landfill operations and staging, and no new off-site land disturbance would occur for construction of the RNG plant.

Both Option 1 and Option 2 RNG pipeline alignments along Kiefer Boulevard cross undulating topography within the unincorporated County of Sacramento (Cosumnes community) and the City of Rancho Cordova. The alignment features a steady elevation drop (about 80 feet over the 13,000 feet), except near the Blodgett Reservoir where there is a 3.5 percent grade drop followed by a 7.2 percent rise. Elevations within the RNG pipeline range from approximately 135 to 220 feet above mean sea level. Kiefer Boulevard is a two-lane roadway with sloped shoulders and roadside ditches. The length of the Kiefer Boulevard right-of-way includes sections of paved road, unpaved shoulder, gravel, and dirt road.

Land uses along the section of Kiefer Boulevard from Kiefer Landfill to Rancho Cordova Parkway are agricultural and open space in nature. Surrounding lands contain habitat for a variety of biological resources. Ruderal vegetation occurs along the shoulders and margins of the paved and unpaved sections of Kiefer Boulevard. The RNG pipeline alignment would cross Blodgett Reservoir and Laguna Creek and would be constructed via HDD. Seasonal wetland vegetation occurs on the banks of Laguna Creek and on the dirt section of Kiefer Boulevard where ephemeral drainages and pools cross into the unpaved right-of-way. Perennial wetland vegetation occurs in and along the banks of the channel below the culvert outlet south of Kiefer Boulevard.

Land uses quickly change to urban, west of Rancho Cordova Parkway along Kiefer Boulevard, then north along Sunrise Boulevard. Option 2A and 2B RNG pipeline alignments would terminate near the intersection of Douglas Road and Sunrise Bouelvard, within a fully urbanized roadway setting. The base-case location for the compressor station for Option 1 or the M&R station for Option 2 would be located west of Sunrise Boulevard and south of Douglas Road with open space to the west and the south of the site and existing PG&E infrastructure to the east. The alternate location would be situated in a different undeveloped parcel east of Sunrise Boulevard and south of Douglas Road, surrounded by commercial businesses with paved parking lots to the north and west, a residential community to the east, and open space (future commercial development) to the south.

The proposed RNG pipeline alignment options and their associated compressor/M&R station are located within the boundaries of the South Sacramento Habitat Conservation Plan (SSHCP). The pipeline begins within the SSHCP plan area at Kiefer Landfill and transitions into the Urban Development Area (UDA) within the boundaries of the City of Rancho Cordova as the pipeline moves west. The SSHCP land cover types along the pipeline route consist primarily of valley grassland, seasonal wetlands, vernal pool, and swale.

OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED

Various approvals and/or permits would be required to implement the proposed project. The environmental documentation for the project would be used to facilitate compliance with federal and state laws and the granting of permits by various state and local agencies having jurisdiction over one or more aspects of the project. These approvals and permits may include, but may not be limited to, the following:

SACRAMENTO COUNTY

- South Sacramento Habitat Conservation Plan Permit (includes U.S. Army Corps of Engineers Section Clean Water Act 404~~;~~ and Central Valley Regional Water Quality Control Board Clean Water Act Section 401~~; and California Department of Fish and Wildlife Section 1602 Lake and Streambed Alteration Program~~ permits)

- Grading Permit

- Department of Transportation: Approval of Traffic Control Plans

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE

- Section 1602 Lake and Streambed Alteration Program Permit

CENTRAL VALLEY REGIONAL WATER QUALITY CONTROL BOARD

- National Pollutant Discharge Elimination System – Construction General Permit

SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

- Air Construction and Operations Permit

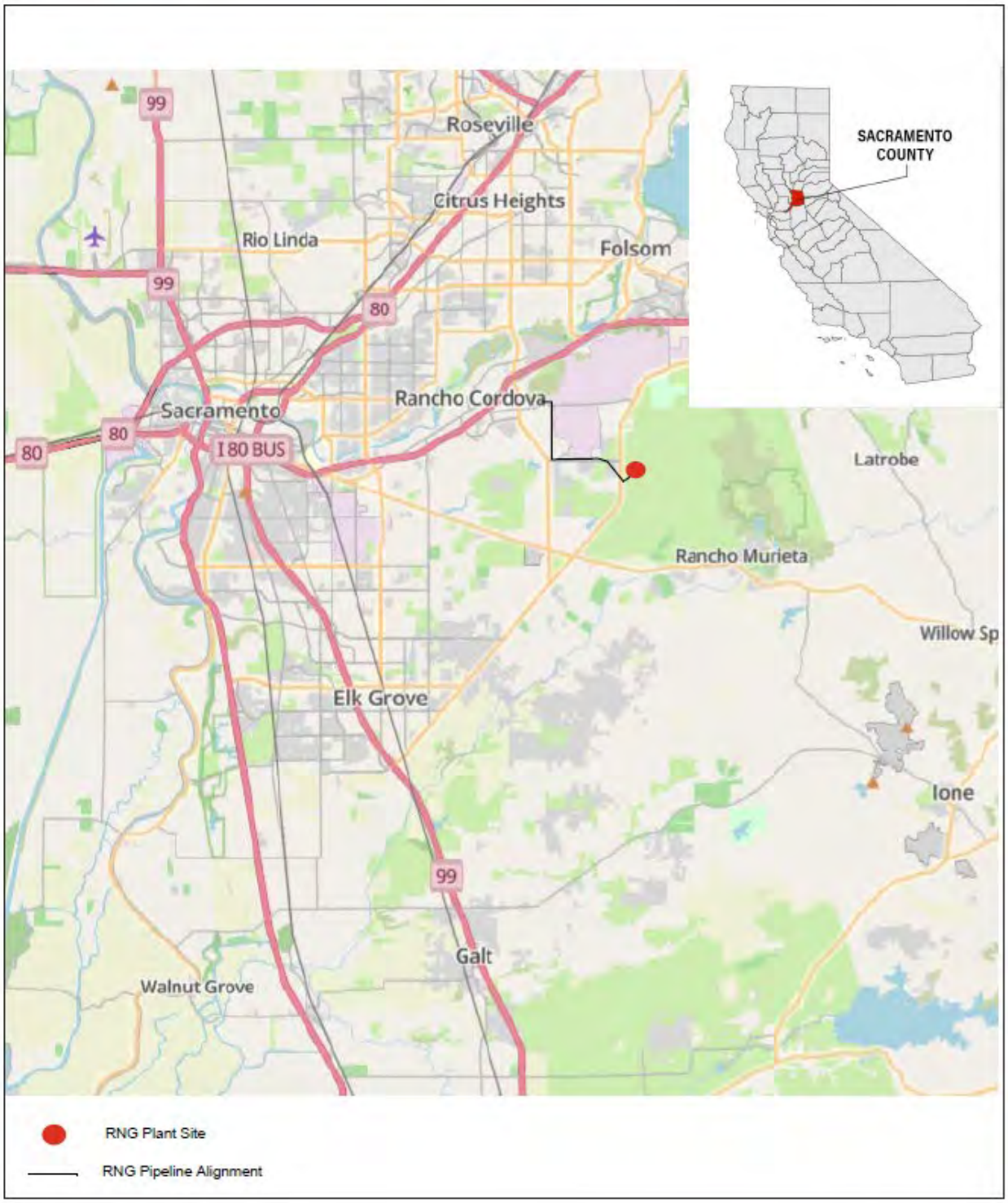
CITY OF RANCHO CORDOVA

- Administrative Use Permit

CENTRAL VALLEY FLOOD PROTECTION BOARD

- Encroachment Permit

Plate IS- 1: Regional Vicinity Map



KIEFER LANDFILL GAS UTILIZATION IS/MND

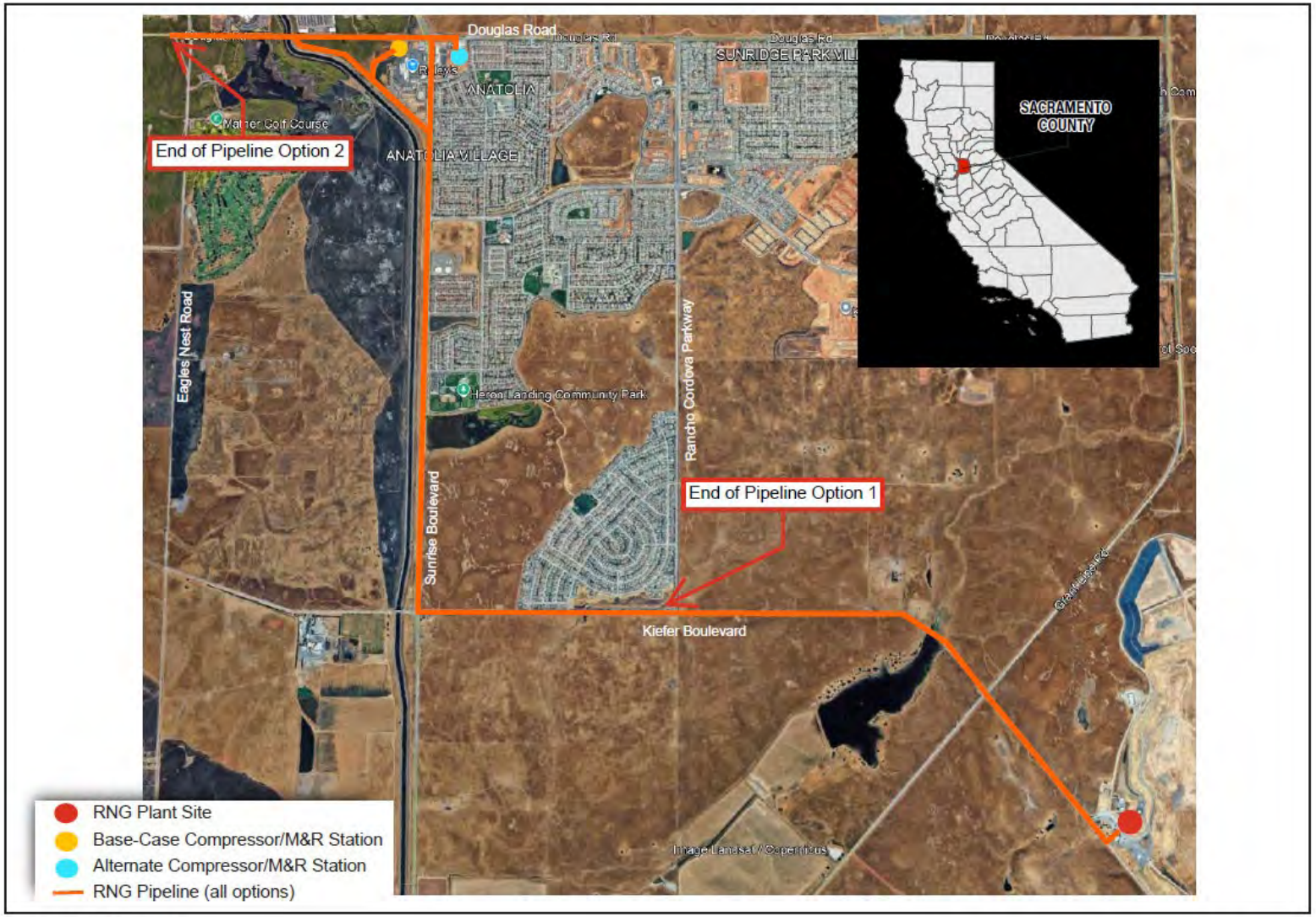
Michael Baker INTERNATIONAL

NOT TO SCALE

Regional Vicinity Map

Plate IS-1

Plate IS- 2: Project Location Map



Source: Google Earth Pro, February 2026

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NOT TO SCALE

KIEFER LANDFILL GAS UTILIZATION IS/MND

Project Location Map

Plate IS-2

Plate IS- 3: Proposed RNG Plant Site Plan



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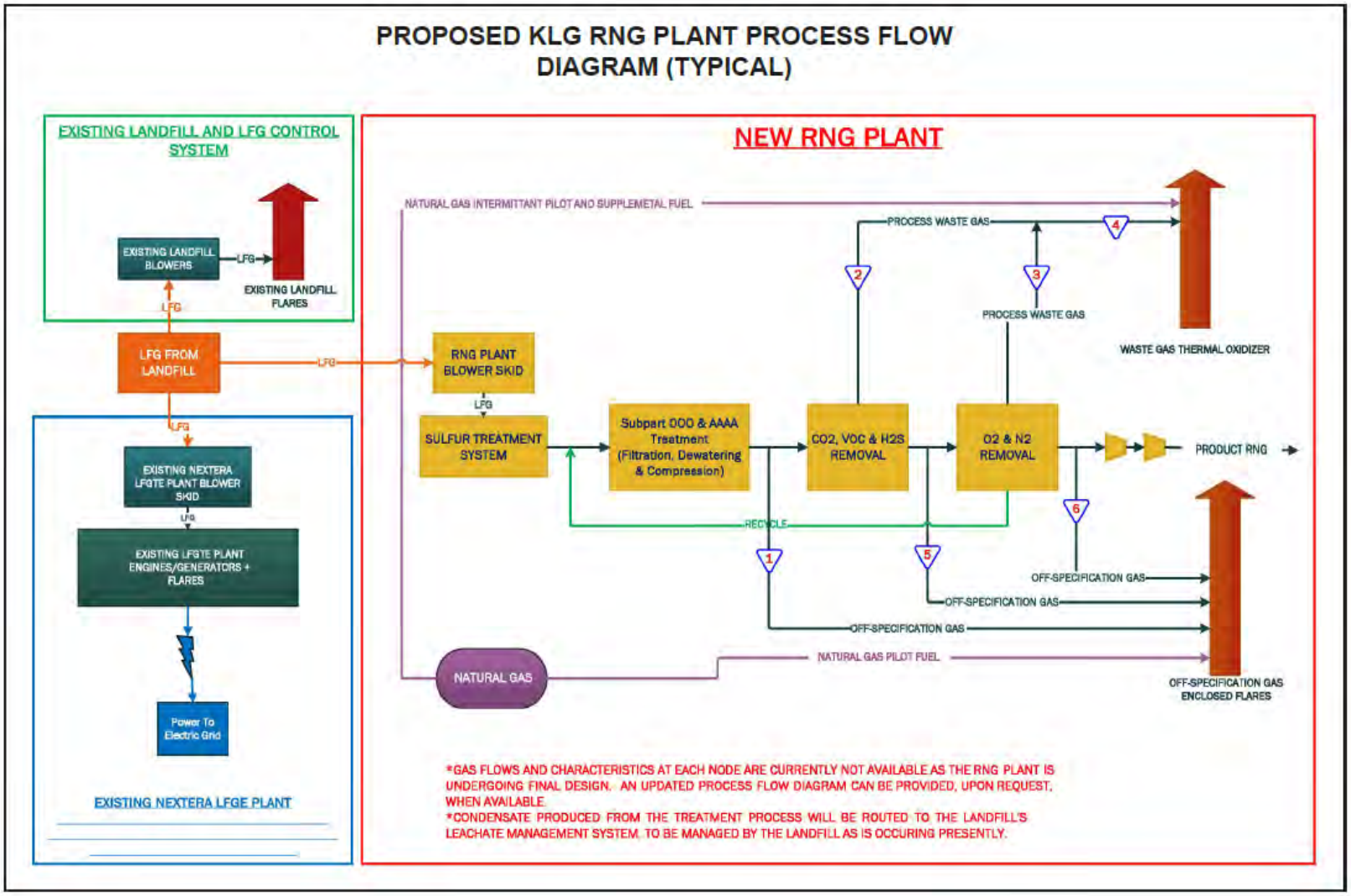
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KIEFER LANDFILL GAS UTILIZATION IS/MND

Proposed RNG Plant Site Plan

Plate IS-3

Plate IS- 4: RNG Plant Process Overview



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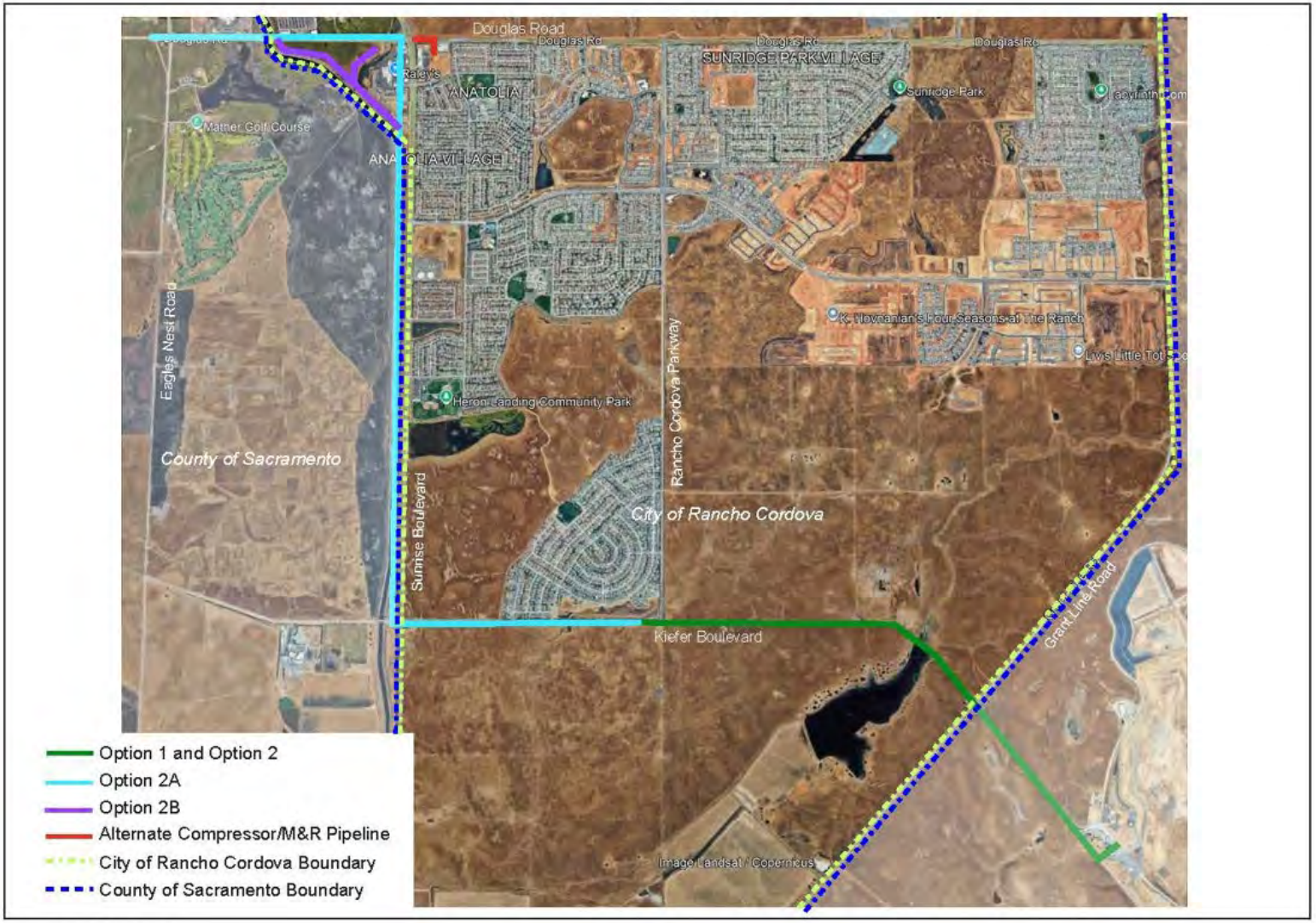
NOT TO SCALE

KIEFER LANDFILL GAS UTILIZATION IS/MND

RNG Plant Process Overview

Plate IS-4

Plate IS- 5: Proposed Pipeline Options



Source: Google Earth Pro, February 2026

KIEFER LANDFILL GAS UTILIZATION IS/MND

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NOT TO SCALE

Proposed Pipeline Options

Plate IS-5

Plate IS- 6: Proposed Compressor Station Options



Source: Google Earth Pro, February 2026

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NOT TO SCALE

KIEFER LANDFILL GAS UTILIZATION IS/MND

Proposed Compressor Station Options

Plate IS-6

ENVIRONMENTAL CHECKLIST

Appendix G of the California Environmental Quality Act (CEQA) provides guidance for assessing the significance of potential environmental impacts. Based on this guidance, Sacramento County has developed the following Initial Study Checklist. The Checklist identifies a range of potential significant effects by topical area. The words "significant" and "significance" used throughout the following checklist are related to impacts as defined by CEQA as follows:

Potentially Significant indicates there is substantial evidence that an effect MAY be significant. If there are one or more “Potentially Significant” entries an Environmental Impact Report (EIR) is required. Further research of a potentially significant impact may reveal that the impact is less than significant or less than significant with mitigation.

Less than Significant with Mitigation applies where an impact could be significant but specific mitigation has been identified that reduces the impact to a less than significant level.

Less than Significant indicates that a project will have an impact, but the impact is considered minor.

No Impact indicates that a project does not impact the resource.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” or “Less than Significant with Mitigation” as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Agriculture and Forestry Resources	☐ Airports
☒ Air Quality	☒ Biological Resources	☒ Cultural Resources
☐ Energy	☒ Geology and Soils	☐ Greenhouse Gas Emission
☐ Hazards and Hazardous Materials	☐ Hydrology and Water Quality	☐ Land Use and Planning
☐ Mineral Resources	☒ Noise	☐ Population and Housing
☐ Public Services	☐ Recreation	☐ Transportation
☒ Tribal Cultural Resources	☐ Utilities and Service Systems	☐ Wildfire

I. AESTHETICS

Except as provided in Public Resources Code Section 21099, would the project:	**Potentially Significant**	**Less than Significant with Mitigation**	**Less than Significant**	**No Impact**
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c. In nonurbanized areas, substantially degrade the existing visual character or quality of public views[1] of the site and its surroundings? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Notes:

[1] *Public views are those that are experienced from a publicly accessible vantage point.*

ENVIRONMENTAL SETTING

The RNG plant site is located within the interior of the Sacramento County Kiefer Landfill, an active solid waste disposal facility situated in a predominately rural area of eastern Sacramento County. The property is characterized by previously disturbed land associated with long-term waste management operations. Vegetation within the interior portions of the landfill is limited due to ongoing landfill activities, with surrounding areas consisting of scattered trees and open space typical of the region.

The RNG pipeline alignment is proposed to run within the public rights-of-way and/or private easements along Kiefer Boulevard to either Rancho Cordova Parkway (Option 1) or Sunrise Boulevard (Option 2). The RNG pipeline crosses Blodgett Reservoir along Kiefer Boulevard. The Option 2 alignment route along Sunrise Boulevard to Douglas Road is located along residential and commercial uses, with a portion located directly adjacent to the Folsom South Canal Recreation Trail. The pipeline would include a compressor station located at Sunrise Boulevard and Douglas Road. Two potential sites under consideration are located on private property on either side of Sunrise Boulevard, with the primary option situated on the west side of the street. Both the base case compressor station location and the alternative site are located within urbanized, commercially developed areas.

REGULATORY SETTING

SACRAMENTO COUNTY ZONING CODE

Sacramento County Zoning Code, the project site is designated as AG-80, an agricultural zoning district intended to support long-term agricultural use and very low-density rural development. This zoning designation establishes a predominately open, rural visual character with limited building structures. The land use designation for the RNG plant is PQP – Cemetery, Public and Quasi-Public.

RANCHO CORDOVA ZONING CODE

The RNG pipeline partially runs through the city of Rancho Cordova and would be located next to areas zoned as Residential (RD-5, RD-4, RD-7, RD-10), Parks and Open Space (POS), Community Service (CS), and General Commercial (GC) and with land uses identified as low density residential, commercial and offices, and urban development area.[3] The proposed compressor stations would be located within a General Commercial zone.

IMPACT DISCUSSION

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

   No Impact. The RNG plant and pipeline alignments are not located near any designated scenic vistas.[4] The RNG plant would be located on the existing Kiefer Landfill site which is highly disturbed. The pipeline and compressor stations would be located within the public right-of-way and/or private easements or property. Views of Blodgett Reservoir and Folsom Canal are available from areas along the pipeline alignments; however, the proposed project would not obstruct scenic vistas from these locations as the pipeline is located underground. Therefore, no impacts to scenic vistas would occur.

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

   No Impact. There are no state-designated scenic highways in the vicinity of the project site. The closest scenic highway corridor is River Road/Highway 160, which is located approximately 17 miles from the project site.[5] As previously discussed, the RNG plant would be located on the existing, highly disturbed Kiefer Landfill and the pipeline and compressor stations would be located within the public right-of-way and/or private easements or property. Though the RNG pipeline would run along a predominately open, rural area along Kiefer Boulevard and portions of Sunrise Boulevard, the proposed project would be buried

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3 City of Rancho Cordova. (n.d.). Zoning Viewer. ArcGIS. Accessed January 15, 2026 from https://ranchocordova.maps.arcgis.com/apps/webappviewer/index.html?id=f08b409f526741b0a5571e1fa90a6842.

4 Sacramento County Community Planning & Development Department. General Plan of 2005-2030. Adopted November 9, 2011.

5 California Department of Transportation. (2018). California State Scenic Highway System Map. ArcGIS. Accessed December 26, 2025 from: https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa

and would not damage scenic resources. Therefore, no impacts to scenic resources would occur.

c. *Would the project, in nonurbanized areas, substantially degrade the existing visual character or quality of public views1 of the site and its surroundings? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?*

Less than Significant Impact. Though the RNG plant would be located in a nonurbanized area, it would be located at the existing Kiefer Landfill, a highly disturbed site that does not contain designated scenic areas or notable public viewpoints. Additionally, the RNG pipeline would be buried within the public right-of-way and/or private easements along predominately open, rural areas along Kiefer Boulevard and portions of Sunrise Boulevard. The alternate compressor site east of Sunrise Boulevard on Douglas Road is designated for commercial use within an existing commercial area, and thus would be consistent with the existing visual character surrounding the site. Further, there is potential to create short-term construction-related impacts to views within the existing right-of-way, as construction activities along Kiefer Boulevard, Sunrise Boulevard, and Douglas Road would be visible from public views and include the presence of construction equipment, vehicles, and construction materials. However, these impacts are temporary in nature and would only be present during construction. Therefore, the proposed project would not substantially degrade the existing visual character or the quality of public views of the site or its surroundings. Impacts in this regard would be less than significant.

d. *Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?*

Less than Significant Impact. Implementation of the proposed project would not create a new source of light or glare that would adversely affect day or nighttime views. The proposed RNG plant would be located within the interior of an active landfill facility, an area that is already disturbed. Any lighting associated with the RNG plant or related infrastructure would be limited to the site and would be consistent with existing landfill operations. Similarly, the proposed compressor station would be situated within a previously developed commercial area, and while it would include some associated lighting, such lighting would be consistent with existing light sources surrounding the site and would not introduce a substantial new source of illumination. The RNG pipeline would be buried and would not require lighting or produce a new source of glare. Further, construction would occur during daytime hours; thus, nighttime construction lighting is not anticipated. As a result, the project would not introduce a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Therefore, impacts related to light and glare would be less than significant.

Environmental Mitigation Measures

None recommended.

II. AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts on agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

Would the project:	**Potentially Significant**	**Less than Significant with Mitigation**	**Less than Significant**	**No Impact**
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c. Introduce incompatible uses in the vicinity of existing agricultural uses?	☐	☐	☐	☒
d. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒
e. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
f. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☒	☐

ENVIRONMENTAL SETTING

The project site is zoned as AG-80, an agricultural zoning district intended to support long-term agricultural use and very low-density rural development and has a General Plan designation of PQP – Cemetery, Public and Quasi-Public. The project site is located on and near lands designated as farmland or used for agriculture. Sacramento County does not contain any forest lands and does not have any zoning designations related to forest land uses.

Regulatory Setting

Farmland Mapping and Monitoring Program

The Farmland Mapping and Monitoring Program (FMMP) was established in 1982 and provides valuable data regarding soil quality and land use, important for land use planning and conservation efforts within California. The Department of Conservation is responsible for preparing, updating, and maintaining Important Farmland Maps and map database. Agricultural lands are rated according to irrigation status and soil quality and are classified into the following categories: Prime Farmland, Farmland of Statewide Importance, Grazing Land, and Urban and Built-Up Land.[6]

Williamson Act

The Williamson Act, also known as the California Land Conservation Act of 1965, enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space uses. The County has designated areas as agricultural preserves for which the County will enter into contracts for the preservation of land in agriculture.

Sacramento County General Plan

The County of Sacramento General Plan designation of PQP – Cemetery, Public and Quasi-Public. The project area is also zoned as AG-80, which is used to identify land that is used for agricultural purposes but less suited for intensive agricultural. The General designation allows single family dwelling units at a density no greater than 80 acres per unit.

The following policy from the Agricultural Element of the General Plan is applicable to the proposed project:

- **AG-2:** The County of Sacramento supports continued agricultural operations and discourages conversion to non-agricultural uses.

- **AG-9:** The County encourages buffers and design measures to reduce land-use conflicts between agricultural and non-agricultural uses. Any new facilities must maintain compatibility.

Impact Discussion

a. *Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?*

   No Impact. Although portions of the surrounding area are designated as Unique Farmland and Farmland of Statewide Importance, the RNG plant is mapped as Urban and Built Up Land under the FMMP.[7] Further, the RNG pipeline would be located within the public right-

[6] California Department of Conservation. (2025). California Important Farmland Finder. ArcGIS. Accessed December 26, 2025 from: https://www.arcgis.com/apps/mapviewer/index.html?webmap=e3ac97649cc94492884add4890f52f3a.

[7] Ibid.

of-way and/or private easements and the compressor and M&R station would be located on private property in land designated for general commercial use. Therefore, the proposed project would not result in the conversion of farmland to non-agricultural use, and no impact would occur.

b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The RNG plant is zoned AG 80; however, Kiefer Landfill has been formally recognized as a long-term landfill and having waste related uses on approximately 2,700 acres, which includes the project site. The site is not under a Williamson Act contract, and the proposed RNG project is consistent with the ongoing landfill operations.[8] Further, the RNG pipeline would be located within the public right-of-way and/or private easements and the compressor and M&R stations would be located on private property in land designated for general commercial use. Therefore, the project would not conflict with existing agricultural zoning or a Williamson Act contract, and no impact would occur.

c. Would the project introduce incompatible uses in the vicinity of existing agricultural uses?

No Impact. The project would be located within the existing Kiefer Landfill, an area already characterized by long term waste management and utility infrastructure rather than active agricultural operations. Although agricultural lands occur in the broader vicinity, the proposed RNG facility and associated pipeline improvements would not introduce new land uses that would conflict with or interfere with existing agricultural activities. Therefore, the project would not introduce incompatible uses near agricultural lands, and no impact would occur.

d. Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Government Code Section 51104(g))?

No Impact. The RNG plant is designated AG-80 for agricultural use and is not zoned or mapped as forest land or timberland under Public Resources Code Section 12220(g) or Government Code Section 51104(g). No forest resources or timber-producing lands occur on or adjacent to the site.[9] Because the project does not involve or affect any areas zoned for forest land or timberland, it would not conflict with existing zoning for or cause rezoning of forest land or timberland. No impact would occur.

e. Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. The project is not within land designated as forest land and would not be located within forested land. Therefore, the project would not result in the loss of forest land or convert forest land to non-forest use. No impact would occur.

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8 California Department of Conservation. (2025). California Williamson Act Enrollment Finder. ArcGIS. Accessed December 26, 2025 from https://maps.conservation.ca.gov/dlrp/WilliamsonAct/App/index.html#data_s=id%3Awidget_22_output_config_default_geocode_0_0%3A0

9 California Department of Fish and Wildlife.(n.d.). California Forests and Timberlands. Accessed December 29, 2025 from https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109917&inline.

f. Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

Less Than Significant Impact. Although the RNG plant would be located within the existing landfill, the RNG pipeline would extend along public right-of-way through nearby agricultural land. Construction would involve temporary trenching within a defined work corridor, with disturbed areas restored after installation. HDD would be used at roadways and sensitive areas to avoid surface impacts. Because these activities are short term and would not introduce new long term non agricultural uses or alter surrounding land use patterns, the project would not lead to the conversion of farmland or forest land.

Environmental Mitigation Measures

None recommended.

III. Airports

Would the project:	**Potentially Significant**	**Less than Significant with Mitigation**	**Less than Significant**	**No Impact**
a. Result in a safety hazard for people residing or working in the vicinity of an airport/airstrip?	☐	☐	☐	☒
b. Expose people residing or working in the project area to aircraft noise levels in excess of applicable standards?	☐	☐	☐	☒
c. Result in a substantial adverse effect upon the safe and efficient use of navigable airspace by aircraft?	☐	☐	☐	☒
d. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒

Environmental Setting

The RNG plant is located approximately 6.6 miles southeast of Mather Airport, which was originally established as a military airfield in 1918 and has supported civilian aviation since 1995. The closest RNG pipeline alignment is approximately 1.5 miles away from Mather Airport. The project site lies within the airport's designated Airport Influence Area but is outside all Community Noise Equivalent Level (CNEL) noise-exposure contours.[10]

[10] Sacramento Area Council of Governments. (2021). Mather Airport Land Use Compatibility Plan. Accessed October 29, 2025 from https://www.sacog.org/planning/land-use/airport-planning/airport-land-use-compatibility-plan.

IMPACT DISCUSSION

a. Would the project result in a safety hazard for people residing or working in the vicinity of an airport/airstrip?

No Impact. The RNG plant is located approximately 6.6 miles southeast of the nearest airport and is outside all Mather Airport safety zones. While a portion of the RNG pipeline alignment lies within Safety Zone 1 of the Mather Airport Land Use Compatibility Plan, the pipeline is considered a compatible use under applicable safety policies.[11] Additionally, the RNG plant's 40 foot stack height would not pose an aviation hazard given its distance from the airport. Therefore, the project would not result in a safety hazard for people residing or working in the vicinity of an airport, and no impact would occur.

b. Would the project expose people residing or working in the project area to aircraft noise levels in excess of applicable standards?

No Impact. The RNG plant is approximately 6.6 miles southeast of the Mather Airport and is located outside the airport's established noise level contours. The closest RNG pipeline alignment is approximately 1.5 miles away from Mather Airport and also outside of the airport's established noise level contours.[12] Therefore, the project would not expose people residing or working in the project area to excess aircraft noise, and no impact would occur.

c. Would the project result in a substantial adverse effect upon the safe and efficient use of navigable airspace by aircraft?

No Impact. As mentioned above in Section III (a), the project site is located outside the Mather Airport safety zones, therefore the project would not result in a safety hazard for people residing or working in vicinity of an airport, and no impact would occur.

d. Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

No Impact. Implementation of the project would not increase air traffic or alter existing flight patterns. Although the RNG Plant would include a 40 foot tall structure, this height does not conflict with any policies in the applicable Airport Land Use Compatibility Plan. As a result, the project would not create aviation related safety hazards, and no impact would occur.

ENVIRONMENTAL MITIGATION MEASURES

None recommended.

[11] Ibid.
[12] Ibid.

IV. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

Would the project:	**Potentially Significant**	**Less than Significant with Mitigation**	**Less than Significant**	**No Impact**
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☒	☐	☐
b. Result in cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☒	☐	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Information within this section for the Distribution Connection Route (Option 1) and the Transmission Connection Route (Option 2), as well as the renewable natural gas (RNG) plant on-site regulated emissions, is primarily based upon the following technical studies; refer to Appendix A:

- *Kiefer Landfill Gas Utilization Project Air Quality and Greenhouse Gas Study* (Pipeline Emissions Study), prepared by Rincon Consultants, Inc., dated April 2026;
- *Potential to Emit (PTE) and Greenhouse Gas (GHG) Information for the Kiefer Landfill Gas (KLG) RNG Project in Support of CEQA Sacramento County, California* (RNG Plant Emissions Study), prepared by NextEra Energy, dated January 22, 2026; and
- *RNG Plant Construction, Mobile, and Off-Road Air Quality Modeling Outputs,* prepared by Michael Baker International, dated April 2026.

ENVIRONMENTAL SETTING

The project site is located within the Sacramento Valley Air Basin (SVAB). The SVAB climate is characterized by hot, dry summers and cool, rainy winters. Average annual precipitation is approximately 20 inches and snowfall occurs rarely. Under typical meteorological conditions, prevailing winds transport air pollutants northward out of the SVAB. However, during portions of the summer and early fall, particularly from July through September, wind patterns periodically shift and transport pollutants southward back into the air basin, contributing to increased pollutant concentrations. In addition, during winter months between storm events, high-pressure systems and light winds frequently result in low-level temperature inversions and stable atmospheric conditions that limit dispersion and allow air pollutants to accumulate.

CRITERIA AIR POLLUTANTS

The U.S. Environmental Protection Agency (USEPA) and the California Air Resources Board (CARB) have identified criteria pollutants regulated at the federal and state levels. These pollutants include ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), lead, coarse particulate matter (PM_{10}), and fine particulate matter ($PM_{2.5}$).

Criteria air pollutants are classified as either primary or secondary pollutants. Primary pollutants, such as CO, SO_2 NO_2, lead, PM_{10}, and $PM_{2.5}$, are emitted directly from stationary and mobile sources. Secondary pollutants, such as O_3, are not emitted directly but are formed in the atmosphere through chemical reactions involving precursor emissions, primarily reactive organic gases (ROG) and nitrogen oxides (NO_X), in the presence of sunlight.

Health-based ambient air quality standards for criteria air pollutants have been established by the USEPA at the federal level and by CARB at the state level. These standards are known as the National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS), respectively, and are designed to protect public health with an adequate margin of safety.

Under the Federal Clean Air Act (FCAA), each state is required to prepare a State Implementation Plan (SIP) demonstrating how the NAAQS will be attained and maintained within federally established deadlines. In California, air quality regulation is implemented through a coordinated framework involving the USEPA, CARB, and local air districts. Within Sacramento County, the SMAQMD is responsible for ensuring that CAAQSs and NAAQSs are attained and maintained in the SVAB.

The SVAB is designated nonattainment under Federal standards for O_3 and $PM_{2.5}$, and under State standards for O_3 and PM_{10}. Both the FCAA and the California Clean Air Act (CCAA) require the preparation of attainment and maintenance plans for criteria air pollutants in areas designated as nonattainment or maintenance. SMAQMD has prepared several air quality plans including the *Sacramento Regional 2015 NAAQS 8-Hour Ozone Attainment & Reasonable Further Progress Plan*, the *$PM_{2.5}$ Implementation/Maintenance Plan and Redesignation Request for Sacramento County $PM_{2.5}$ Nonattainment Area*, and the *PM_{10} Implementation/Maintenance Plan and Redesignation Request for Sacramento County*, collectively referred to as air quality plans throughout this analysis.

REGULATORY SETTING

SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

As discussed above, SMAQMD is the responsible local agency for air quality in Sacramento County. All projects are subject to SMAQMD rules and regulations in effect at the time of construction.[13] The applicable SMAQMD rules and regulations would include, but would not be limited to, the following:

- Rule 403 related to Fugitive Dust;
- Rule 404 Related to Particulate Matter;
- Rule 442 related to Architectural Coatings;

[13] Sacramento Metropolitan Air Quality Management District. (n.d.). Rules and regulations (businesses). Accessed December 31, 2025, from https://www.airquality.org/Businesses/Rules-Regulations#09.

- Rule 453 related to Cutback and Emulsified Asphalt Paving Materials; and
- Rule 460 related to Adhesives and Sealants.

Because the SVAB is in nonattainment for O_3, PM_{10} and $PM_{2.5}$, the SMAQMD requires all projects to implement the District's Basic Construction Emission Control Practices (also known as Best Management Practices [BMPs]) through conditions of approval or mitigation.[14] Compliance and implementation of the BMPs allows for proposed projects to utilize the SMAQMD's significance thresholds for construction and operational emissions, as shown in **Table IS-1**. The project would not be expected to result in a cumulatively considerable contribution to a significant cumulative impact if emissions do not exceed SMAQMD thresholds shown in **Table IS-1**.

Table IS-1: SMAQMD Significance Thresholds

Pollutant	Construction	Operation
ROG	None	65 lbs/day
NOX	85 lbs/day	65 lbs/day
PM10 1	80 lbs/day and 14.6 tons/ year	Same as construction
PM2.5 1	82 lbs/day and 15.0 tons/ year	Same as construction

SMAQMD = Sacramento Metropolitan Air Quality Management District; ROG = Reactive Organic Gas; NO_X = nitrogen oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; lbs/day = pounds per day; tons/year = tons per year

[1] Only applies to projects for which all feasible best available control technology (BACT) and best management practices (BMPs) have been applied. Projects that fail to apply all feasible BACT/BMPs must meet a significance threshold of zero lbs/day.

Source: Pipeline Emissions Study; refer to Appendix A.

Impact Discussion

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant With Mitigation. The SMAQMD is required to reduce emissions of criteria pollutants for which the Sacramento region is designated nonattainment. The SMAQMD's air quality plans are based on regional population and employment growth projections contained in the Sacramento Area Council of Governments' (SACOG) 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS).[15] Consistency with these attainment plans is demonstrated when a project does not induce growth beyond that anticipated in the MTP/SCS and when construction emissions are controlled consistent with SMAQMD requirements in a nonattainment area. The proposed

[14] Sacramento Metropolitan Air Quality Management District, Basic Construction Emission Control Practices (Best Management Practices), 2019. Accessed December 31, 2025, from https://www.airquality.org/LandUseTransportation/Documents/Ch3BasicEmissionControlPracticesBMPSFinal7-2019.pdf

[15] While the Sacramento Area Council of Governments (SACOG) has recently adopted the 2025 RTP/SCS (2025 Blueprint Plan), SMAQMD has not released an updated air quality plan. As such, this consistency analysis is based off the latest air quality management plans and the RTP/SCS that was adopted at the time, the 2020 RTP/SCS.

project would involve construction and operation of a renewable natural gas (RNG) facility and associated pipeline infrastructure and would not include residential or other growth-inducing land uses. Therefore, the project would not result in population growth or conflict with regional growth forecasts. Operational activities would generate a limited number of vehicle trips associated with wastewater hauling, employee commuting, deliveries, and periodic service and maintenance. Therefore, project vehicle trips would not affect regional travel demand or long-term emissions.

However, because the SVAB is nonattainment for PM_{10} and $PM_{2.5}$, and construction activities would generate temporary emissions of PM_{10} and $PM_{2.5}$, the project is required to implement SMAQMD's Basic Construction Emissions Control Practices to ensure construction emissions remain below applicable SMAQMD thresholds. Therefore, Mitigation Measure AQ-1 requires implementation of SMAQMD's Basic Construction Emissions Control Practices for fugitive dust and exhaust emissions during construction. With implementation of Mitigation Measure AQ-1, the project would not conflict with or obstruct implementation of applicable air quality attainment plans, and impacts would be less than significant.

b. Would the project result in cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Less Than Significant With Mitigation.

Construction Emissions

Project construction would primarily generate pollutants from construction equipment operating on-site, as well as construction worker trips, vendor trips, and material delivery trips. The project proposes constructing the RNG plant and either the Distribution Connection Route (Option 1) or the Transmission Connection Route (Option 2).

Project-generated construction emissions were modeled with the CARB-approved California Emissions Estimator Model, version 2022.1 (CalEEMod). Construction emissions were quantified for each phase based on the anticipated duration and equipment types provided by the project Applicant. See Appendix A for more information regarding the construction assumptions used in this analysis.

Table IS-2 presents the project's maximum daily short-term construction emissions for the RNG plant, Distribution Connection Route (Option 1), and Transmission Connection Route (Option 2), as well as the worst-case overlapping construction scenarios associated with simultaneous construction of the RNG plant and either the Distribution Connection Route (Option 1) or the Transmission Connection Route (Option 2). **Table IS-2** also shows the anticipated construction schedule for each phase.

Table IS-2: Maximum Daily Construction Emissions

Phase	Duration Start	Duration End	Maximum Daily Emissions (lbs/day)[1]				Annual Emissions (tons/year)	
			ROG[2]	NO_X	PM_{10}	$PM_{2.5}$	PM_{10}	$PM_{2.5}$
RNG Plant[3]								
Demolition	1/1/2027	2/1/2027	1.47	14.13	1.22	0.59	0.01	0.01
Grading	2/2/2027	5/2/2027	1.96	23.58	9.64	4.53	0.31	0.14
Infrastructure Improvements	5/3/2027	9/3/2027	1.28	11.19	0.64	0.43	0.05	0.02
Building Construction	9/4/2027	12/31/2027	0.80	8.74	0.76	0.32	0.03	0.01
	1/1/2028	2/4/2028	0.77	8.23	0.74	0.30	0.01	<0.01
Foundations Only	9/4/2027	10/2/2027	0.01	0.25	0.04	0.01	<0.01	<0.01
Finishing Phase	2/5/2028	3/30/2028	0.21	2.68	0.55	0.12	0.01	<0.01
Option 1: Distribution Connection Route[4]								
Linear, Drainage, Utilities, & Sub-Grade	10/1/2027	12/31/2027	3.81	33.70	7.66	4.12	0.25	0.14
	1/1/2028	4/28/2028	3.75	32.73	7.58	4.05	0.32	0.17
Site Preparation	10/16/2027	10/17/2027	1.21	10.46	2.99	1.62	<0.01	<0.01
Grading	10/18/2027	10/20/2027	1.41	12.21	3.40	1.86	<0.01	<0.01
Building Construction	10/21/2027	12/31/2027	1.01	8.49	0.40	0.28	0.01	0.01
	1/1/2028	3/9/2028	0.96	8.11	0.37	0.25	0.01	0.01
Paving	3/10/2028	3/17/2028	0.99	4.16	0.27	0.16	<0.01	<0.01
Architectural Coating	3/18/2028	3/25/2028	34.89	0.81	0.04	0.02	<0.01	<0.01

Table IS-2: Maximum Daily Construction Emissions

Phase	Duration Start	Duration End	Maximum Daily Emissions (lbs/day)[1]				Annual Emissions (tons/year)	
			ROG[2]	NO_X	PM_{10}	$PM_{2.5}$	PM_{10}	$PM_{2.5}$
Option 2: Transmission Connection Route[4]								
Linear, Drainage, Utilities, & Sub-Grade	10/1/2027	12/31/2027	7.13	63.17	14.84	8.03	0.49	0.26
	1/1/2028	4/28/2028	7.01	61.43	14.70	7.89	0.62	0.34
Site Preparation	10/16/2027	10/17/2027	1.21	10.46	2.99	1.62	<0.01	<0.01
Grading	10/18/2027	10/20/2027	1.41	12.21	3.40	1.86	<0.01	<0.01
Building Construction	10/21/2027	12/31/2027	1.01	8.49	0.40	0.28	0.01	0.01
	1/1/2028	3/9/2028	0.96	8.11	0.37	0.25	0.01	0.01
Paving	3/10/2028	3/17/2028	0.99	4.16	0.27	0.16	<0.01	<0.01
Architectural Coating	3/18/2028	3/25/2028	34.89	0.81	0.04	0.02	<0.01	<0.01
Overlapping Scenarios								
Maximum Emissions (RNG Plant and Option 1)[5]:			38.84	54.66	11.82	6.29	0.34	0.18
Maximum Emissions (RNG Plant and Option 2)[5]:			42.10	84.12	19.01	10.20	0.64	0.35
SMAQMD thresholds[6]			**-**	**85**	**80**	**82**	**14.6**	**15**
Exceed threshold?			**N/A**	**No**	**No**	**No**	**No**	**No**

NO_X = nitrogen oxides; SMAQMD = Sacramento Metropolitan Air Quality Management District; PM_{10} = particulate matter 10 microns or less in diameter; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter; ROG = reactive organic gas; tons/year = tons per year; RNG = renewable natural gas

[1] Represents the highest emissions during construction activity.
[2] Although SMAQMD does not recommend ROG thresholds, estimates of construction-generated ROG emissions, which are an ozone precursor, are shown for information purposes only.
[3] Emissions based on CalEEMod.
[4] Emissions based on the Pipeline Emissions Study. Emissions conservatively assume the compressor station would be built under both the Distribution Connection Route (Option 1) and the Transmission Connection Route (Option 2) scenarios.
[5] The complete emissions table with overlapping scenarios is provided in Appendix A. CalEEMod Section 3, Construction Emissions Details, was used to show the maximum pounds per day per construction phase for each project component (i.e., RNG Plant, Option 1, and Option 2). The Construction Emissions – Overlapping Scenarios table depicts each project component, as well as the construction phase and start/end dates; refer to Appendix A. The table shows 16 overlapping scenarios and the associated maximum overlapping emissions.
[6] The project would implement all applicable SMAQMD best management practices with implementation of Mitigation Measure AQ-1, therefore, the SMAQMD thresholds shown in this table represent all applicable best management practices applied. Without applicable best management practices, the significance thresholds for PM_{10} and $PM_{2.5}$ would be zero.
Source: CalEEMod; Pipeline Emissions Study; refer to Appendix A.

As discussed in the Regulatory Setting section, the SMAQMD recommends all projects to implement the District's Basic Construction Emission Control Practices, also known as BMPs, through conditions of approval or mitigation. Compliance and implementation of the BMPs allows for projects to utilize the SMAQMD's significance thresholds for construction and operational emissions, as shown in **Table IS-2**. Without implementation of SMAQMD's BMPs, the PM_{10} and $PM_{2.5}$ construction thresholds would be zero.

In accordance with SMAQMD recommendations, the project would implement Mitigation Measure AQ-1 which requires compliance with SMAQMD's Basic Construction Emissions Control Practices to reduce fugitive dust and exhaust emissions during construction. As shown in **Table IS-2**, construction emissions would not exceed SMAQMD's thresholds with implementation of Mitigation Measure AQ-1. Therefore, short-term air quality impacts would be less than significant with incorporation of Mitigation Measure AQ-1.

Operational Emissions

Under existing conditions, landfill gas generated at the Kiefer Landfill is collected and combusted on-site at two engine plants, KLG-1 and KLG-2, to generate electricity supplied to the Sacramento Municipal Utility District. KLG-1 consists of three 3-megawatt engines and KLG-2 consists of two 3-megawatt engines, which typically operate continuously except during planned or unplanned outages. During outages, or when landfill gas production exceeds engine capacity, excess gas is routed to two existing enclosed landfill gas flares for combustion. In addition to the engine plants and flares, existing sources of emissions at the landfill include street sweepers, a diesel-fueled standby emergency generator, and a gasoline dispensing facility. **Table IS-3** presents the permitted potential-to-emit (PTE) criteria pollutant emissions associated with these existing stationary and operational sources.

The project proposes an RNG plant at Kiefer Landfill, with a pipeline connection to existing PG&E natural gas infrastructure via either the Distribution Connection Route (Option 1) or the Transmission Connection Route (Option 2). Operation of the RNG plant would replace on-site electricity generation with landfill gas treatment and pipeline injections, while existing landfill infrastructure would continue to operate as needed for landfill gas management. Stationary and operational sources associated with the RNG plant and continued landfill operations would include up to two converted natural gas engines associated with the existing Kiefer Landfill Gas facility, existing landfill gas flares (Flare No. 1 and/or Flare No. 2), existing diesel-fueled standby emergency generator, street sweepers, and an existing gasoline dispensing facility. In addition, the proposed RNG plant would include new off-specification gas process flares (two units), a thermal oxidizer, and a natural gas-fueled emergency generator. The PTE daily operational emissions from these stationary and operational sources are summarized in **Table IS-3**. It should be noted that the PTE emissions conservatively assume operation of the landfill flares approximately 20 percent of the time, which encompasses anticipated startup, shutdown, maintenance, transition, and contingency operating conditions. Operational monitoring, alarm systems, and established operating procedures would be used during startup, shutdown, maintenance, commissioning, and upset conditions to ensure continued compliance with applicable landfill gas control requirements, SMAQMD permit conditions, and air quality regulations. Under both routine and non-routine operating scenarios, landfill gas would either be processed through the RNG plant or combusted in permitted control devices, thereby maintaining continuous landfill gas control and minimizing emissions.

The RNG plant would also generate minimal operational vehicle trips and off-road equipment activity. Specifically, operational vehicle trips would include wastewater hauling to the EchoWater Resources Recovery Facility, daily employee commuting, routine delivery truck visits, and periodic service and maintenance trips using pickup trucks, utility trucks, box trucks, and vacuum trucks. In total, the RNG plant would generate 14 vehicle trips per day. It should be noted that 14 vehicle trips per day is a conservative assumption as the majority of vehicle trips would occur occasionally throughout the year; refer to Appendix A for the specific vehicle trip assumptions. Off-road equipment associated with the proposed RNG plant would include one forklift and one scissor lift. **Table IS-3** summarizes the mobile and off-road equipment emissions associated with the RNG plant.

As shown in **Table IS-3**, the proposed RNG plant, in combination with either the Distribution Connection Route (Option 1) or the Transmission Connection Route (Option 2), would result in a net reduction of criteria pollutants when compared to existing conditions. Therefore, the project operational emissions would not exceed SMAQMD's thresholds and impacts would be less than significant.

Table IS-3: Maximum Daily Operational Emissions

Project Component	Scenario	Maximum Daily Emissions (lbs/day)				Annual Emissions (tons/year)	
		ROG[1]	NO_X	PM_{10}	$PM_{2.5}$	PM_{10}	$PM_{2.5}$
Existing Conditions							
Existing Conditions[2]	On-Site PTE[5]	557.41	898.00	226.20	226.20	27.12	27.12
RNG Plant + Option 1: Distribution Connection Route							
RNG Plant[3]	On-Site PTE[5]	195.08	590.05	120.98	120.98	14.30	14.30
	Mobile	0.02	0.89	0.19	0.06	0.03	0.01
	Off-road Equipment[5]	0.08	1.44	0.01	0.01	<0.01	<0.01
	Total	*195.18*	*592.39*	*121.18*	*121.05*	*14.33*	*14.31*
Option 1: Distribution Connection Route[4]	*Total*	*1.00*	*1.00*	*1.00*	*<1.00*	*<1.00*	*<1.00*
Net Total Emissions (RNG Plant + Option 1: Distribution Connection Route - Existing Conditions):		***-361.23***	***-304.61***	***-104.02***	***-104.15***	***-11.79***	***-11.81***
SMAQMD threshold		*65*	*65*	*80*	*82*	*14.6*	*15*
Exceed threshold?		*No*	*No*	*No*	*No*	*No*	*No*

Table IS-3: Maximum Daily Operational Emissions

Project Component	Scenario	Maximum Daily Emissions (lbs/day)				Annual Emissions (tons/year)	
		ROG[1]	NO_X	PM_{10}	$PM_{2.5}$	PM_{10}	$PM_{2.5}$
RNG Plant + Option 2: Transmission Connection Route							
RNG Plant[3]	On-Site PTE[5]	195.08	590.05	120.98	120.98	14.30	14.30
	Mobile	0.02	0.89	0.19	0.06	0.03	0.01
	Off-road Equipment[6]	0.08	1.44	0.01	0.01	<0.01	<0.01
	Total	*195.18*	*592.39*	*121.18*	*121.05*	*14.33*	*14.31*
Option 2: Transmission Connection Route[4]	*Total*	*1.00*	*1.00*	*1.00*	*<1.00*	*<1.00*	*<1.00*
Net Total Emissions (RNG Plant + Option 2: Transmission Connection Route - Existing Conditions):		***-361.23***	***-304.61***	***-104.02***	***-104.15***	***-11.79***	***-11.81***
SMAQMD threshold		*65*	*65*	*80*	*82*	*14.6*	*15*
Exceed threshold?		*No*	*No*	*No*	*No*	*No*	*No*

lbs/day = pound per day; NO_X = nitrogen oxides; SMAQMD = Sacramento Metropolitan Air Quality Management District; PM_{10} = particulate matter 10 microns or less in diameter; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter; ROG = reactive organic gas; tons/year = tons per year; PTE = potential to emit; RNG = renewable natural gas

[1] In developing these thresholds, SMAQMD considered levels at which project emissions are cumulatively considerable. Consequently, exceedances of project-level thresholds would be cumulatively considerable. As noted above, it assumed that the BACT and BMPs for particulate matter are required by existing air district rules, regulations, and building codes. Compliance with the BMPs identified by SMAQMD for operational particulate matter emissions are mandatory, and thus the non-zero numeric thresholds apply to project operations.
[2] Existing Conditions emissions were developed consistent with SMAQMD guidance using representative historical actual emissions and Kiefer Landfill annual emissions inventory data reported to SMAQMD; where needed, combined permitted engine/flare emissions were allocated by source based on each source's permitted daily emission-limit ratio, as documented in the RNG Plant Emissions Study shown in Appendix A.
[3] Emissions based on CalEEMod outputs shown in Appendix A.
[4] Emissions based on the Pipeline Emissions Study. Emissions conservatively assume the compressor station would be built under both the Distribution Connection Route (Option 1) and the Transmission Connection Route (Option 2) scenarios.
[5] Emissions based on Scenario 2 within RNG Plant Emissions Study. Scenario 2 is the reasonably foreseeable operating scenario for the RNG plant.
[6] The project would include one forklift and one scissor lift.

Source: CalEEMod; Pipeline Emissions Study; RNG Plant Emissions Study; refer to Appendix A.

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant With Mitigation.

Construction Emissions

Construction activities would generate short-term emissions of toxic air contaminants (TACs), primarily diesel particulate matter (DPM), from the temporary use of off-road diesel-fueled construction equipment and heavy-duty trucks associated with hauling and vendor trips. Health risks from TACs, including DPM, are primarily associated with long-term, chronic exposure, particularly increased cancer risk, rather than short-term activities. Construction related DPM emissions would be intermittent, temporary, and episodic, and exhaust would dissipate rapidly, limiting the concentration and duration of exposure at nearby sensitive receptors. In addition, construction activities would be transient across the project site (i.e., move from location to location), rather than occurring in a fixed location for extended periods, which would further limit potential exposure.

Health risk assessment methodologies are designed to evaluate exposure over long averaging periods (e.g., 9, 30, or 70 years) and are not representative of the short-term and highly variable nature of construction activities. The California Office of Environmental Health Hazard Assessment (OEHHA) has not identified adverse health effects from short term exposure to DPM. Construction equipment and heavy-duty trucks would comply with applicable CARB regulations governing in-use diesel engines, including emission reduction requirements and idling restrictions, which further reduce DPM emissions.[16,17] Given the temporary and intermittent nature of construction activities, regulatory controls on diesel equipment and trucks, and the dispersive characteristics of diesel exhaust, construction related TAC emissions would not expose nearby sensitive receptors to substantial DPM concentrations. Additionally, the project would reduce construction emissions through Mitigation Measure AQ-1 which requires implementation of SMAQMD's Basic Construction Emissions Control Practices for fugitive dust and exhaust emissions during construction. Impacts would be less than significant in this regard.

Operational Emissions

Under existing conditions, landfill gas at Kiefer Landfill is continuously combusted on-site through multiple internal combustion engines and flares, which are the primary sources of TAC emissions. The proposed project would replace on-site electricity generation with landfill gas treatment and renewable natural gas pipeline injection, resulting in the removal or reduced operation of higher-emitting combustion engines. Although the RNG plant would introduce new stationary equipment, including process flares and a thermal oxidizer, these units would primarily serve to control off-specification gas and waste gas, respectively, and are designed to achieve efficient combustion with low TAC emission rates. As a result, overall combustion intensity at the landfill would be reduced, and TAC emissions under

16 California Air Resources Board. (n.d.). In-Use Off-Road Diesel-Fueled Fleets Regulation (13 CCR §2449). Available at: https://ww2.arb.ca.gov/our-work/programs/use-road-diesel-fueled-fleets-regulation.

17 California Air Resources Board. (n.d.). Airborne Toxic Control Measure to Limit Diesel Fueled Commercial Motor Vehicle Idling,(13 CCR §2485). Available at: https://ww2.arb.ca.gov/our-work/programs/atcm-to-limit-vehicle-idling.

project conditions would be lower than under existing conditions. Therefore, the project would not expose sensitive receptors to substantial pollutant concentrations with implementation of Mitigation Measure AQ-1 and impacts would be less than significant.

d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant Impact. SMAQMD identifies certain land uses, such as wastewater treatment plants, landfills, composting operations, and recycling facilities, as potential sources of objectionable odors.[18] Construction of the proposed project would involve diesel-powered equipment that can generate temporary odors; however, these emissions would be short-lived, dispersed over a large area, and unlikely to affect a substantial number of people. Additionally, construction of the proposed project would require one or more pipeline tie-in activities that may involve temporary pipeline gas clearance procedures. Consistent with standard PG&E practice, advance notification and outreach would be provided to nearby residents and businesses prior to these activities. During operation, the RNG plant would not generate additional odors beyond existing conditions. Any odors associated with the RNG plant would be minimal and localized. The project would include pressure relief valves to protect equipment and maintain compliance with applicable federal and state safety requirements. In the unlikely event that a pressure relief valve is activated, gas would be discharged to a designated safe location in accordance with applicable design and safety standards. Periodic maintenance activities may require temporary depressurization of isolated piping segments or equipment. Such activities are expected to occur infrequently and would be conducted in accordance with PG&E's established operating and maintenance procedures. The project will also include natural gas detection and safety systems designed to continuously monitor for gas releases. If gas concentrations exceed established thresholds, the system is designed to automatically initiate protective actions, including equipment shutdown, isolation of affected equipment, and notification to PG&E operations personnel. For these reasons, the project would not create a significant source of odors, and impacts would be less than significant.

Environmental Mitigation Measures

The following mitigation measure<u>s</u> would be implemented during construction of the project to reduce potential impacts related to air quality <u>and at the request of the SMAQMD</u>.

<u>AQ-1: Reduce Construction-Generated Fugitive Dust and Exhaust</u>

Construction contractors must implement the measures listed below to reduce construction-generated fugitive dust. Control of fugitive dust is required per SMAQMD Rule 403 and enforced by SMAQMD staff. The list of required measures was informed by SMAQMD's basic ~~and enhanced~~ construction emission control practices.

- Water all exposed surfaces two times. Exposed surfaces include, but are not limited to soil piles, graded areas, unpaved parking areas, staging areas, and access roads.
- Cover or maintain at least 2 feet of free board space on haul trucks transporting soil, sand, or other loose material on the site. Any haul trucks that would be traveling along freeways or major roadways should be covered.

[18] Sacramento Metropolitan Air Quality Management District. (n.d.). SMAQMD Permitting Process.

- Use wet power vacuum street sweepers to remove any visible track out mud or dirt onto adjacent public roads at least once a day. Use of dry power sweeping is prohibited.

- Limit vehicle speeds on unpaved roads to 15 miles per hour.

- All roadways, driveways, sidewalks, parking lots to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used.

- Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes (California Code of Regulations [CCR], Title 13, Sections 2449[d][3] and 2485). Provide clear signage that posts this requirement for workers at the entrances to the site.

- Provide current certificate(s) of compliance with CARB's In-Use Off-Road Diesel-Fueled Fleets Regulation (CCR, Title 13, Sections 2449 and 2449.1).

- Maintain all construction equipment in proper working condition, according to manufacturer's specifications. The equipment must be checked by a certified mechanic and determined to be running in proper condition before it is operated.

AQ-2: REDUCE OFF-ROAD EQUIPMENT EXHAUST-RELATED EMISSIONS DURING CONSTRUCTION

For construction activities within the project area, including the compressor station site and renewable natural gas pipeline, construction contractor(s) shall ensure that off-road diesel-fueled equipment with engines larger than 50 horsepower shall meet or exceed CARB Tier 4 Final emissions standards.

An exemption from these requirements may be granted by the County if the construction contractor(s) submits documents to the County demonstrating that equipment with the required tier is not reasonably available. Before an exemption may be considered by the County, construction contractor(s) shall be required to demonstrate that two construction fleet owners/operators in Sacramento County were contacted and that those owners/operators confirmed Tier 4 final equipment could not be located within Sacramento County.

V. BIOLOGICAL RESOURCES

Would the project:	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
a. Have a substantially adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐

b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☒	☐	☐
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☒	☐	☐
e. Adversely affect or result in the removal of native or landmark trees?	☐	☐	☐	☒
f. Conflict with any local policies or ordinances protecting biological resources?	☐	☒	☐	☐
g. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☒	☐	☐

Environmental Setting

Potential impacts to biological resources associated with the proposed project were determined from the results presented in the Biological Resource Evaluation, Aquatic Resource Delineation Report, Special-Status Wildlife Habitat Assessment, and Rare Plant Survey Report prepared for the proposed project, which are included as Appendices B through E to this IS/MND.

Thorough literature reviews and records searches were conducted to determine which special-status biological resources have the potential to occur on or within the general vicinity of the project site. Field surveys were conducted in September 2024, and April, May, and July 2025 by Vollmar Natural Lands Consulting (VNLC) to document existing conditions and determine the potential for jurisdictional features, sensitive habitats, and habitat potential for special-status plant and wildlife species to occur within the project site. The Biological Study Area (BSA) prepared for the proposed project considers the proposed pipeline alignments and a 300-foot buffer.

The BSA includes a mix of rural and urbanized land uses, such as pasture and grassland, low density residential and commercial development, and landscaped areas. The southeastern portion of the BSA includes a portion of Kiefer Landfill and the Kiefer Landfill Preserve. Portions of Mather Regional Park are also present in the western portion of the BSA. The BSA contains portions of Mather Lake, Morrison Creek, the South Folsom Canal, and Blodgett Reservoir. Habitats noted in the BSA include vernal pools and swales, freshwater marsh, seasonal wetland, valley (non-native) grassland, cropland, and mixed riparian scrub/woodland. The freshwater marsh habitat type only occurs adjacent to open water features within the BSA: Mather Lake, Blodgett Reservoir, and Morrison Creek. Surrounding land uses are similar to

those in the BSA, primarily consisting of pasture and developed areas. The compressor station located west of the intersection of Sunrise Boulevard and Douglas Road would be located approximately 150 feet west of Morrison Creek. The compressor site east of the intersection of Sunrise Boulevard and Douglas Road is located within a developed commercial area.

The proposed project is also located within the South Sacramento Habitat Conservation Plan (SSHCP) boundary and is considered a covered activity by the SSHCP.[19] Therefore, the project must comply with the provisions of the SSHCP. According to the baseline habitat mapping included in the SSHCP, the project site contains the following landcover types including natural communities as shown in **Table IS-4**.

Table IS-4:Landcover Types in the BSA

Habitat	Acres
Aqueducts	30.2 acres
Detention Basin	7.1 acres
Disturbed	46.0 acres
Freshwater Marsh	**3.4 acres**
High Density Development	17.9 acres
Low Density Development	62.0 acres
Major Roads	49.8 acres
Mixed Riparian Woodland	**0.7 acres**
Open Water	**2.5 acres**
Seasonal Wetlands	**1.7 acres**
Streams/Creeks	**3.2 acres**
Streams/Creeks (VPIH)	**0.8 acres**
Swale	**3.1 acres**
Valley Grassland	**341.4 acres**
Vernal Pool	**8.5 acres**

**bold text* = Natural Communities; VPIH = Vernal Pool Invertebrate Habitat*

SPECIAL STATUS SPECIES

Special-status species evaluated include those identified in the SSHCP, as well as those listed by the U.S. Fish and Wildlife Service (USFWS) and/or California Department of Fish and Wildlife (CDFW) as threatened or endangered, as well as those proposed for listing or that are candidates for listing as threatened or endangered. The California Natural Diversity Database (CNDDB), USFWS Information Planning and Consultation System (IPac), and the California Native Plant Society (CNPS) were reviewed to identify special-status plant and wildlife observations in the project vicinity and to help evaluate the potential for federally listed species to occur in the BSA. **Table IS-5** provides a list of species evaluated to determine their potential

[19] Sacramento County Planning and Environmental Review. (2018). South Sacramento Habitat Conservation Plan. Accessed December 29, 2025 from https://planning.saccounty.gov/PlansandProjectsIn-Progress/Pages/SSHCPPlan.aspx.

within, or adjacent to, the project site based on the required habitat characteristics, existing conditions, and known occurrences within the project vicinity.

The likelihood of occurrence is rated as Not Expected, Low Potential, Moderate Potential, or High Potential, as defined below. Additionally, species with a CNDDB recorded occurrence on the site or were observed during the survey were identified as Documented in **Table IS-5.**

- *Not Expected*: A survey was performed by a qualified biologist, and the species was not found and habitat is absent both on the site and within one mile of the site.
- *Low Potential*: Habitat is near-absent.
- *Moderate Potential*: Habitat is present, but the species has not been observed within five miles of the site.
- *High Potential*: Habitat is present and the species has been observed within five miles of the site.
- *Documented*: The CNDDB contains a recorded occurrence on the site, or the species was found during site-specific surveys.

There are 32 special-status wildlife species with potential to occur in the BSA. Of the 32 wildlife species with potential, 12 species were determined to have a high potential to occur, 2 species were determined to have moderate potential to occur, and 18 species were determined to have low potential to occur. Ten of the 12 species with a high potential to occur were also documented during field surveys. Nine of these species with a high potential to occur in the BSA are federally or state-listed wildlife species. These include Crotch's bumble bee (*Bombus crotchii*); monarch butterfly (*Danaus plexippus plexippus)*; Swainson's hawk (*Buteo swainsoni)*; tricolored blackbird (*Agelaius tricolor*); vernal pool fairy shrimp (*Branchinecta lynchi*); vernal pool tadpole shrimp (*Lepidurus packardi*); burrowing owl (*Athene cunicularia*); western pond turtle (*Actinemys marmorata*); and western spadefoot toad (*Spea hammondii*). The other three high-potential species are non-listed species: loggerhead shrike (*Lanius ludovicianus*); white-tailed kite (*Elanus leucurus)*; and Midvalley fairy shrimp (*Branchinecta mesovallensis*).

There are 12 special-status plant species with potential to occur in the BSA. Of the 12 plant species with potential, 2 species were determined to have high potential to occur and were documented during field surveys, 6 species were determined to have moderate potential to occur, and 4 species were determined to have low potential to occur. Three of these species with a moderate or high potential to occur in the BSA are federally or state-listed plant species. These include Sacramento orcutt grass (*Orcuttia viscida*), which was observed within the BSA as recorded in the CNDDB; Slender orcutt grass (*Orcuttia tenuis*); and Boggs Lake hedge-hyssop (*Gratiola heterosepala*). Additionally, during protocol-level rare plant surveys in spring 2025, only one rare species, legenere, was documented in four vernal pools within the BSA. Legenere is restricted to vernal pool habitats, largely within California's Central Valley, and is associated with this habitat within the BSA. The populations observed in the study area occurred in vernal pools which were notably much deeper and longer-inundated than the vast majority of pools in the region; they bloomed in mid-April to early May at the edges of still-wet pools when nearly all other pools were dry.

Species which are not present or not expected to occur on the site are not discussed further in subsequent analysis sections. The wildlife species that were not expected include pallid bat

(*Antrozous pallidus*); California tiger salamander (*Ambystoma californiense*); conservancy fairy shrimp (*Branchinecta conservation*); and American bumble bee (*Bombus pennsylvanicus*). The plant species that were not expected include Ione manzanita (*Arctostaphylos myrtifolia*); Brewer's calandrinia (*Calandrinia breweri)*; Pine Hill ceanothus (*Ceanothus roderickii)*; Parry's rough tarplant (*Centromadia parryi*); Red Hills soaproot (*Chlorogalum grandiflorum)*; Brandegee's clarkia (*Clarkia biloba ssp. brandegeeae);* Bisbee Peak rush-rose *(Crocanthemum suffrutescens)*; Peruvian dodder (*Cuscuta obtusiflora var. glandulosa)*; Ione buckwheat (*Eriogonum apricum var. apricum)*; Irish Hill buckwheat (*Eriogonum apricum var. prostratum);* Jepson's woolly sunflower (*Eriophyllum jepsonii)*; Tuolumne button-celery (*Eryngium pinnatisectum);* Pine Hill flamebush (*Fremontodendron decumbens)*; El Dorado bedstraw (*Galium californicum ssp. sierrae);* woolly rose-mallow (*Hibiscus lasiocarpos var. occidentalis*); Parry's horkelia (*Horkelia parryi);* coast iris (*Iris longipetala)*; alkali-sink goldfields (*Lasthenia chrysantha)*; Heckard's pepper-grass (*Lepidium latipes var. heckardii);* hoary navarretia (*Navarretia eriocephala);* Layne's ragwort (*Packera layneae);* saline clover (*Trifolium hydrophilum);* and El Dorado County mule ears (*Wyethia reticulata).*

Table IS-5: Special-Status Species within Vicinity of the Project Site and Potential of Occurrence

Species	Status[1]	Habitat	Potential for Occurrence[2]
BIRDS			
Bald Eagle *Haliaeetus leucocephalus*	SE/FP/S3	Usually, nests in forested areas near large bodies of water (primary food source is fish) and is often seen in dry, open uplands near open water during the winter.	**Low Potential.** The vicinity of the Study Area provides potential upland habitat. In contrast, the nearby American River provides potential feeding habitat and connects to the larger water bodies of Lake Natoma and Folsom Lake. Several Bald Eagles have been previously documented within the Study Area on iNaturalist.
Bank Swallow *Riparia riparia*	ST/S3	In summer, it is restricted to riparian, lacustrine, and coastal areas with vertical banks, bluffs, and cliffs with fine-textured or sandy soils, into which it digs nesting holes. In migration, flocks with other swallows over many open habitats – mainly freshwater and estuarine wetlands.	**Low Potential.** Potential migration habitat in creeks and wetlands within and surrounding the Study Area, and potential summer habitat in the nearby American River. There are two CNDDB-documented observations within 5 miles of the Study Area, but the most recent is from 1995.
California Black Rail *Laterallus jamaicensis coturniculus*	ST/FP/S2	Occurs in freshwater marshes, wet meadows, and shallow margins of saltwater marshes bordering larger bays. Requires permanent water (depths of about 1 inch that do not fluctuate during the year) and dense vegetation for nesting. Dependent upon upper zones of saline emergent wetlands, especially with pickleweed, and brackish fresh emergent wetlands.	**Low Potential.** The Study Area contains some freshwater marsh habitat but lacks the majority of primary habitat requirements, including saltwater marsh, brackish fresh emergent wetlands, and shallow permanent water features. The closest documented observation was in 2017, about 15 miles away from the Study Area, in a recently developed area.
Cooper's Hawk *Astur cooperii*	WL/S4	Nests in coast live oaks and other dense forest or woodland habitats, often on flat ground; may use large trees in suburban and urban settings.	**Moderate Potential**: Large trees adjacent to the Study Area may provide nesting habitat, as well as large trees in the surrounding suburban and urban areas. There are two documented CNDDB sightings within 5 miles of the Study Area, but the most recent is from 1990. There are multiple sightings in the area on eBird, though they are concentrated on the urban areas with more trees.
Ferruginous Hawk	WL/S3/S4	Frequents open grasslands, sagebrush flats, desert scrub, low foothills	**Low Potential.** There is one documented sighting in CNDDB (from 1991) within 2 miles of the Study Area.

Table IS-5: Special-Status Species within Vicinity of the Project Site and Potential of Occurrence

Species	Status[1]	Habitat	Potential for Occurrence[2]
Buteo regalis		surrounding valleys, and fringes of pinyon-juniper habitats. Roosts in open areas, usually in a lone tree or utility pole.	Study Area may provide suitable roosting and foraging habitat.
Golden Eagle *Aquila chrysaetos*	WL/FP/S3	Forages in open terrain such as grassland, desert, savannah, or young forests and shrub habitat. Constructs large nests on platforms of cliffs or in large trees in open areas.	**Low Potential.** The Study Area does not provide optimal foraging or nesting habitat. There is only one documented sighting within 5 miles of the Study Area (from 1991).
Grasshopper Sparrow *Ammodramus savannarum*	SSC/S3	This species is most often found in valley grasslands, fallowed fields, and managed rangelands with limited disturbance during the breeding season. Ground nests are usually placed at the base of bunchgrasses or under low vegetation, where cover protects from predators.	**Low Potential.** There is one documented sighting in CNDDB within 5 miles of the Study Area.
Greater Sandhill Crane *Grus canadensis tabita*	ST/FP/S2	Inhabits freshwater marshes and prairie ponds during summer, and grainfields or open grasslands during migration and winter. Winters in the Central Valley and breeds in high mountain meadows in the northern Sierra Nevada and Cascade Ranges.	**Low Potential.** The Study Area is not within the mapped habitat for this species within the SSHCP, and lacks the flat, open wetlands that this species forages and breeds in.
Loggerhead Shrike *Lanius ludovicianus*	SSC/S4	Common resident and winter visitor in the lowlands and foothills of California. Prefers open habitats with scattered shrubs, trees, posts, fences, utility lines, or other perches.	**High Potential/Documented.** The Study Area provides suitable habitat for this species, and it was documented by VNLC ecologists during 2025 field surveys.
Merlin *Falco columbarius*	WL/S3/S4	It is found in open habitats such as grasslands, open forests, and coastal areas with shorebirds.	**Low Potential.** The most recent documented observations were from 2004 of wintering adults, with the closest single observation being from ~8 miles away from the Study Area. The Study area is not in close proximity to coastal areas with shorebirds, but does contain grassland habitat.

Table IS-5: Special-Status Species within Vicinity of the Project Site and Potential of Occurrence

Species	Status[1]	Habitat	Potential for Occurrence[2]
Northern Harrier *Circus hudsonius*	SSC/BCC/S3	Inhabits marsh and riparian vegetation and forages within grasslands.	**Moderate Potential.** The Study Area provides suitable habitat for this species.
Song Sparrow (Modesto population) *Melospiza melodia*	SSC/S3	This species prefers emergent freshwater marshes, riparian willow thickets, riparian forests of valley oak with blackberry understory, and along vegetated irrigation canals and levees. Require moderately dense vegetation to supply cover for nest sites, sources of running or standing water, semi-open canopies to allow light, and exposed ground or leaf litter for foraging.	**Low Potential.** The most recent documented observations were from 2009 about 15 miles Southwest of the Study Area. There are riparian willow thickets, riparian valley oak forests with blackberry understory, and vegetated canals.
Swainson's Hawk *Buteo swainsoni*	ST/S4	Breeds in stands with few trees in juniper-sage flats, riparian areas, and in oak savannah in the Central Valley. Forages in adjacent grasslands or suitable grain or alfalfa fields, or livestock pastures.	**High Potential/Documented.** Observed foraging and nesting on site in 2025 by VNLC biologists. The Study Area provides suitable foraging habitat adjacent to the riparian areas along the American River and nearby creeks. Large trees suitable for nesting are present in the Study Area.
Tricolored Blackbird *Agelaius tricolor*	ST/SSC/BCC/S2	Prefers extensive freshwater marshes. Forages in open habitats such as pastures and lawns.	**High Potential/Documented.** The Study Area and nearby freshwater resources provide suitable foraging habitat. Observations of large nesting colonies and foraging individuals within the Study Area boundaries and up to 5 miles of the Study Area documented in CNDDB over the last few decades. VNLC biologists documented this species during 2025 field surveys.
Burrowing Owl *Athene cunicularia*	SCE/SSC/BCC/S2	Prefers open, treeless areas with low, sparse vegetation in grasslands, coastal and desert scrub, pastures, agricultural fields, and more. Associated with mammal burrows, especially those of the California ground squirrel, where they also nest.	**High Potential/Documented.** There have been several CNDDB-documented observations within and around the Study Area (as recent as 2010). Mammal burrows are present on site, as well as culverts suitable for nesting. A single bird was flushed from a culvert in the northwestern Study Area during 2024 surveys.
White-Tailed Kite	FP/S3/S4	Found in savannas, open woodlands, marshes, desert grasslands, cleared lands,	**High Potential/Documented.** Study Area may provide foraging and/or nesting habitat. This species has been

Table IS-5: Special-Status Species within Vicinity of the Project Site and Potential of Occurrence

Species	Status[1]	Habitat	Potential for Occurrence[2]
Elanus leucurus		and cultivated fields. Nests in upper parts of trees growing either in isolation or at the edge of a forest. Forages in undisturbed open grasslands, meadows, farmlands, and emergent wetlands.	observed several times within 3 miles of the Study Area. A white-tailed kite was observed flying overhead during the 2024 VNLC surveys.
MAMMALS			
American Badger *Taxidea taxus*	SSC/S3	Forages in dry, open stages of shrub, forest, and herbaceous habitats. Lives in burrows in dry, friable soils where young are born.	**Low Potential.** Badgers often avoid urban areas, but there is open space in the Study Area. There are two CNDDB-documented sightings in the vicinity from 1990; one was very near the Study Area boundary, but that specific area has since been developed.
Western Red Bat *Lasiurus frantzii*	SSC/S3	Roosts in trees, occasionally shrubs, on the edge of habitats adjacent to urban areas, fields, and streams above dark ground cover. Forages in open areas	**Low Potential.** Trees suitable for roosting and an appropriate foraging area are available on site. The nearest CNDDB occurrence is >10 miles from the Study Area.
AMPHIBIANS			
Western Spadefoot Toad *Scaphiopus hammondii*	FPT/SSC/S3/S4	Grasslands with shallow temporary pools are optimal habitats for the western spadefoot. Adults remain in underground burrows during most of the year.	**High Potential.** Vernal pools in the Study Area provide potential breeding habitat. There are multiple CNDDB-documented observations within 5 miles of the Study Area, with a sighting as recent as 2018. California ground squirrels, whose burrows provide potential habitat, were observed in the Study Area in 2024.
FISHES			
Steelhead - Central Valley Distinct Population Segment *Oncorhynchus mykiss irideus*	FT/SSC/S2	These are naturally spawned anadromous steelhead originating below natural and manmade impassable barriers from the Pajaro River to (but not including) the Santa Maria River. Juveniles may migrate from freshwater to lagoons and estuaries, or between reservoirs and tributaries, multiple times in a single year. Immature	**Low Potential.** The Study Area includes sections of Laguna Creek and Morrison Creek, and it falls within the Magnuson-Stevens Act Essential Fish Habitat for this species. However, it does not overlap the American River, which is a USFWS-designated critical habitat, and there are no estuaries in the surrounding area. The only documented sighting in CNDDB within 5 miles of the Study Area is from 2014 in the American River.

Table IS-5: Special-Status Species within Vicinity of the Project Site and Potential of Occurrence

Species	Status[1]	Habitat	Potential for Occurrence[2]
		steelhead typically spend several weeks to months in estuaries.	
CRUSTACEANS			
Vernal Pool Fairy Shrimp *Branchinecta lynchi*	FT/S3	Occurs primarily in vernal pools, seasonal wetlands, and stagnant ditches that fill with water during fall and winter rains and dry up in spring and summer.	**High Potential/Documented.** Vernal pools within and just outside of the Study Area provide suitable habitat, and the Study Area overlaps USFWS Designated Critical Habitat for this species. There are numerous CNDDB-documented sightings both in the Study Area and within 5 miles of it (as recent as 2011).
Midvalley Fairy Shrimp *Branchinecta mesovallensis*	S2/S3	Found in shallow, ephemeral pools, generally in grasslands and lower elevation foothills in the middle of the Central Valley. Can live in relatively warm water, and can live in smaller and shorter-lived pools than some other branchiopods due to its rapid development.	**High Potential.** Vernal pools in the vicinity of the Study Area provide suitable habitat, and the species has been documented multiple times within 5 miles of the Study Area (as recently as 2017).
Hairy Water Flea *Dumontia oregonesis*	S1	Observed in vernal pools and other seasonal/temporary wetlands. Limited distribution. Has been found in southern Oregon and central California.	**Low Potential.** This species has a very limited distribution, and it is often found only in sets of pools within 2 miles of each other; however, it was observed within 5 miles of the Study Area one time (in 1990).
Vernal Pool Tadpole Shrimp *Lepidurus packardi*	FE/S3	Observed habitats range from small, clear, well-vegetated vernal pools to highly turbid, alkali scald pools to large winter lakes.	**High Potential/Documented.** Vernal pools within and just outside of the Study Area provide suitable habitat, and the Study Area overlaps USFWS Designated Critical Habitat for this species. There are numerous CNDDB-documented sightings both in the Study Area and within 5 miles of it (as recent as 2018).
INSECTS			
Blennosperma Vernal Pool Andrenid Bee *Andrena blennospermatis*	S1	Ground-nesting species found in upland areas near vernal pools. Larvae pupate in the fall; adults overwinter underground and emerge in the spring. Associated with *Blennosperma* genus flowers.	**Low Potential.** Vernal pools and adjacent uplands in the Study Area may provide suitable habitat for this species. There is one CNDDB-documented observation of this bee in the vicinity of the Study Area (just over 2 miles away) from an unknown year before 2000.

Table IS-5: Special-Status Species within Vicinity of the Project Site and Potential of Occurrence

Species	Status[1]	Habitat	Potential for Occurrence[2]
			Blennosperma plants were not observed by VNLC biologists during preliminary surveys (September 2024), but they may be present in early spring. (*B. nanum* normally blooms from February to April.)
Vernal Pool Andrenid Bee *Adreba subpasta*	S1/S2	It can be found in grasslands with forb species present; information on the species' habitat requirements is limited.	**Low Potential.** There is little known information on this species and the last documented observations of this species were from 1932 and 1954. The Study Area does contain grassland habitat.
Crotch's bumble bee *Bombus crotchii*	SCE/S2	Found in open grassland and scrub. May nest in a variety of places, either underground or above ground.	**High Potential:** The Study Area may provide a suitable habitat. Abandoned ground squirrel burrows may be used to nest. This species was documented less than a mile from the Study Area near Morrison Creek in 2020 and within the site on iNaturalist in 2024.
Valley Elderberry Longhorn Beetle *Desmocerus californicus dimorphus*	FT/S3	Found nearly always on or close to the host plant, red or blue elderberry. Usually occurs in elderberry stands along rivers and streams.	**Low Potential.** There are multiple CNDDB-documented occurrences of this species within 5 miles of the Study Area, with the most recent being in 2013. Elderberry plants were not observed by VNLC biologists in preliminary surveys of the Study Area. Still, they may exist along the streams within and/or near their boundaries.
Ricksecker's Water Scavenger Beetle *Hydrochara rickseckeri*	S2	Found in vernal pools and possibly other shallow freshwater habitats. Restricted to California's Central Valley and is rarely observed. Not known to migrate locally or long-distance.	**Low Potential.** This species is extremely rare, but it was documented within the Study Area in 1997. The vernal pools and other aquatic features in the Study Area provide potential habitat.
Monarch Butterfly – California overwintering population *Danaus Plexippus plexippus*	FPT/S2	Roosts in wind-protected tree groves with nectar and water nearby. Overwinters in tall trees in large groups during migration. Forages on showy nectar source flowers. Lays eggs on milkweed host plant (primarily *Asclepias* spp.).	**High Potential/Documented:** Trees in the vicinity of the Study Area may provide suitable migration habitat, and flowers and water sources are also present. *Asclepias fascicularis*, a potential host plant, was observed in the Study Area by VNLC biologists in 2024. There are no CNDDB documented monarch sightings within 5 miles of the Study Area, but three records from the Study Area

Table IS-5: Special-Status Species within Vicinity of the Project Site and Potential of Occurrence

Species	Status[1]	Habitat	Potential for Occurrence[2]
			exist on the online community science database iNaturalist.
REPTILES			
Western Pond Turtle *Actinemys marmorata*	FPT/SSC/SNR	Perennial ponds, deep slow-moving streams, marshes, irrigation, ditches, small lakes, and permanent pools along intermittent streams are habitats for this species at elevations of 6,000 feet and below. Logs, rocks, cattail mats, and exposed banks are not required for basking. Eggs are laid in loose soil on land in oak woodlands, mixed coniferous forests, broadleaf forests, and grasslands, usually within 400 feet of their aquatic habitats.	**High Potential.** Creeks within the Study Area may provide suitable habitat. There are several iNaturalist documented occurrences within the Study Area at Mather Lake. There have been a few other documented sightings within 5 miles of the Study Area.
Giant Garter Snake *Thamnophis gigas*	FT/ST/S2	It is found in marshes, sloughs, ponds, small lakes, streams, and agricultural wetlands such as rice fields. Basks on vegetation near water in spring and utilizes animal burrows and vegetation piles during hotter weather. Overwinters in small mammal burrows.	**Low Potential.** Streams in the Study Area may provide suitable habitat. Small mammal burrows are likely present in the Study Area, as California ground squirrels have been observed there. No sightings of this snake have been documented in CNDDB within 5 miles of the Study Area.
PLANTS			
Valley Brodiaea *Brodiaea rosea ssp. vallicola*	4.2	Valley and foothill grassland, Vernal pools; Microhabitat: Silt, Alluvial Terraces, Gravelly, Sandy Elevation Range: 35 – 1,100 feet Bloom Period: April – May (June)	**Moderate Potential.** Previous observations and collections on CalFlora in 2022 adjacent to Study Area.
Spicate Calycadenia *Calycadenia spicata*	1B.3	Cismontane woodland, Valley and foothill grassland; Microhabitat: Adobe, Clay, Disturbed areas, Dry, Gravelly, Openings, Roadsides, Rocky	**Moderate Potential**. One CNDDB observation in 2020, ~ 5.5 miles from the Study Area.

Table IS-5: Special-Status Species within Vicinity of the Project Site and Potential of Occurrence

Species	Status[1]	Habitat	Potential for Occurrence[2]
		Elevation Range: 130 – 4,595 feet Bloom Period: May – September	
Dwarf Downingia *Downingia puscilla*	2B.2	Valley and foothill grassland (mesic), Vernal pools Elevation Range: 5 – 1,460 feet Bloom Period: March – May	**Low Potential.** The closest non-historical occurrence is ~8.7 miles southwest.
Stinkbells *Fritillarian agrestis*	4.2	Chaparral, Cismontane woodland, Pinyon and Juniper woodland, Valley and foothill grassland; Microhabitat: Clay, Serpentine (sometimes) Elevation Range: 35 – 5,100 feet Bloom Period: May – June	**Low Potential**. Last recorded observation and collection in 1996 on opposite side of Jackson Road, south of Study Area. Study Area supports valley grassland habitat, lacks soils with high clay content.
Boggs Lake Hedge-Hyssop *Gratiola heterosepala*	SE/1B.2	Marshes and swamps (Lake Margins), Vernal pools; Microhabitat: Clay Elevation Range: 35 – 7,790 feet Bloom Period: April – August	**Moderate Potential**. Multiple nearby observations from 2023.
Hogwallow Starfish *Hesperevax caulesces*	4.2	Valley and foothill grassland (Mesic clay), Vernal pools (shallow); Microhabitat: Alkaline (sometimes) Elevation Range: 0 – 1,655 feet Bloom Period: March – June	**Low Potential.** Multiple observations from 2004-2024; the Study Area does not support suitable vernal pool habitat.
Ahart's Dwarf Rush *Juncus leiospermus var. ahartii*	1B.2	Valley and foothill grassland (mesic), vernal pools Elevation Range: 100 – 750 feet Bloom Period: March – May	**Moderate Potential**. One extant observation in 2006, 0.3 miles to the west of the Study Area.

Table IS-5: Special-Status Species within Vicinity of the Project Site and Potential of Occurrence

Species	Status[1]	Habitat	Potential for Occurrence[2]
Legenere *Legenere limosa*	1B.1	Vernal pools Elevation Range: 5 – 2,885 feet Bloom Period: April – June	**High Potential/Documented.** Multiple nearby documented occurrences in the vicinity, including two within the Study Area in 1993. Documented on site by VNLC botanists in 2025.
Pincushion Navarretia *Navarretia myersii ssp. myersii*	1B.1	Vernal pools; Microhabitat: Acidic (often) Elevation Range: 65 – 1,085 feet Bloom Period: April – May	**Low Potential.** Most recent, nearby, documented occurrence ~6.7 miles to northeast in 2016; Study Area contains suitable vernal pool habitat and acidic soils.
Slender Orcutt Grass *Orcuttia tenuis*	FT/SE/1B.1	Vernal pools; Microhabitat: Gravelly (often) Elevation Range: 115 – 5,775 feet Bloom Period: May – September (October)	**Moderate Potential.** One observation in 2012, 0.64 miles east of the Study Area.
Sacramento Orcutt Grass *Orcuttia viscida*	FE/SE/1B.1	Vernal pools Elevation Range: 100 – 330 feet Bloom Period: April – July (September)	**High Potential/Documented.** CNDDB recorded one observation inside the Study Area and four adjacent.
Sanford's Arrowhead *Sagittaria sanfordii*	1B.2	Marshes and swamps (shallow freshwater) Elevation Range: 0 – 2,135 feet Bloom Period: May – October (November)	**Moderate Potential.** The Study Area contains a suitable freshwater marsh habitat. Two recent occurrences ~4.7 miles downstream of Mather Lake in Morrison Creek.

1 Status Codes:

Federal Endangered Species Act: FE = Federally Endangered; FT = Federally Threatened; FPT = Federal Proposed Threatened
California Endangered Species Act: SE = State Endangered; ST = State Threatened; SCE = State Candidate Endangered
U.S. Fish and Wildlife Service (USFWS): BCC = USFWS Birds of Conservation Concern
California Department of Fish and Wildlife (CDFW): FP = CDFW Fully Protected; SSC = CDFW Species of Special Concern; WL = CDFW Watch List Species
State Conservation Status Rank: S1 = Critically Imperiled; S2 = Imperiled; S3 = Vulnerable; S4 = Apparently Secure; SNR = Unranked
California Rare Plant Ranks Codes:
List 1B = Plants rare, threatened, or endangered in CA and elsewhere
List 2B = Plants rare, threatened or endangered in California but more common elsewhere
4 = Plants of limited distribution, a watch list
'.1' = Seriously threatened in CA; '.2' = Fairly threatened in CA; '.3' = Not very threatened in CA

2 Species highlighted in grey have a moderate or high potential to occur onsite.

Notes: CNDDB = California Natural Diversity Database; VNLC = Vollmar Natural Lands Consulting

REGULATORY SETTING

FEDERAL

FEDERAL ENDANGERED SPECIES ACT

The Federal Endangered Species Act (FESA) of 1973 protects species that are federally listed as endangered or threatened with extinction. FESA prohibits the unauthorized "take" of listed wildlife species. Take includes harassing, harming, pursuing, hunting, shooting, wounding, killing, trapping, capturing, or collecting wildlife species or any attempt to engage in such activities. Harm includes significant modifications or degradations of habitats that may cause death or injury to protected species by impairing their behavioral patterns. Harassment includes disruption of normal behavior patterns that may result in injury to or mortality of protected species. Civil or criminal penalties can be levied against persons convicted of unauthorized "take." In addition, FESA prohibits malicious damage or destruction of listed plant species on federal lands or in association with federal actions, and the removal, cutting, digging up, damage, or destruction of listed plant species in violation of state law. FESA does not afford any protections to federally listed plant species that are not also included on a state endangered species list on private lands with no associated federal action.

MIGRATORY BIRD TREATY ACT

The Migratory Bird Treaty Act (MBTA) prohibits the take, possession, import, export, transport, selling, purchase, barter, or offering for sale, purchase or barter, any native migratory bird, their eggs, parts, and nests, except as authorized under a valid permit (50 CFR 21.11.). Likewise, Section 3513 of the California Fish & Game Code prohibits the "take or possession" of any migratory non-game bird identified under the MBTA. Therefore, activities that may result in the injury or mortality of native migratory birds, including eggs and nestlings, would be prohibited under the MBTA.

WETLANDS AND WATERS OF THE U.S.

Federal and state regulation (Clean Water Act Sections 401 and 404) use the term "surface water" to refer to all standing or flowing water which is present above-ground either perennially or seasonally. There are many types of surface waters, but the two (2) major groupings are linear waterways with a bed and bank (streams, rivers, etc.) and wetlands. The Clean Water Act has defined the term wetland to mean "those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions." The term "wetlands" includes a diverse assortment of habitats such as perennial and seasonal freshwater marshes, vernal pools, and wetland swales. The 1987 Army Corps Wetlands Delineation Manual is used to determine whether an area meets the technical criteria for a wetland and is therefore subject to local, state or federal regulation of that type of habitat. A delineation verification by the U.S. Army Corps of Engineers (USACE) will verify the size and condition of the wetlands and other waters in question and will help determine the extent of government jurisdiction.

Wetlands are regulated by both the federal and state government, pursuant to the Clean Water Act Section 404 (federal) and Section 401 (state). The USACE is generally the lead agency for the federal permit process, and the Regional Water Quality Control Board (RWQCB) is

generally the lead agency for the state permit process. The Clean Water Act protects all "navigable waters," which are defined as traditional navigable waters that are or were used for commerce or may be used for interstate commerce; tributaries of covered waters; and wetland adjacent to covered waters, including tributaries. Isolated wetlands, that is, those wetlands that are not hydrologically connected to other "navigable" surface waters (or their tributaries), are not considered to be subject to the Clean Water Act.

In addition to the Clean Water Act, the state also has jurisdiction over impacts to surface waters through the Porter-Cologne Water Quality Control Act, which does not require that waters be "navigable." For this reason, Federal non-jurisdictional waters, or isolated wetlands, can be regulated by the State of California pursuant to Porter-Cologne.

The Clean Water Act establishes a "no net loss" policy regarding wetlands for the state and federal governments, and General Plan Policy CO-58 establishes a "no net loss" policy for Sacramento County. Pursuant to these policies, any wetlands to be excavated or filled require 1:1 mitigation, and construction within the wetlands cannot take place until the appropriate permit(s) have been obtained from the USACE, USFWS, RWQCB, CDFW, and any other agencies with authority over surface waters. Any loss of delineated wetlands not mitigated through the permitting process must be mitigated, pursuant to County policy. Appropriate mitigation may include establishment of a conservation easement over wetlands, purchase of mitigation banking credits, or similar measures.

STATE

STATE ENDANGERED SPECIES ACT

With limited exceptions, the California Endangered Species Act (CESA) of 1984 protects state designated endangered and threatened species in a way similar to FESA. For projects on private property (i.e. that for which a state agency is not a lead agency), CESA enables CDFW to authorize take of a listed species that is incidental to carrying out an otherwise lawful project that has been approved under CEQA (Fish & Game Code Section 2081). Take includes import and export, possession, purchase, or sale of CESA listed species.

CALIFORNIA FISH AND GAME CODE, SECTION 3503.5 – RAPTOR NESTS

Section 3503.5 of the Fish and Game Code makes it unlawful to take, possess, or destroy hawks or owls, unless permitted to do so, or to destroy the nest or eggs of any hawk or owl.

PORTER-COLOGNE ACT

Enacted in 1969, the Porter-Cologne Water Quality Control Act is the primary state law governing water quality in California. The act applies to all waters of the state, including groundwater, surface water, and wetlands and regulates both nonpoint sources and point sources of pollution. The goal of the act is to protect and enhance the quality of California's waters for the benefit of the public and the environment.

The Porter-Cologne Act established nine regional water boards and assigned them the responsibility for implementing and enforcing water quality standards within their respective basins. The Act uses Waste Discharge Requirements (WDRs) permits to regulate the discharge of wastes into state waters to prevent pollution that could harm aquatic life and provides for the regulation of various activities with the potential to affect water quality and biological resources.

LOCAL

SACRAMENTO COUNTY GENERAL PLAN

The Conservation Element of the Sacramento County General Plan includes policies and objectives to protect and manage natural resources while maintaining long-term ecological health in unincorporated Sacramento County.[20] The Conservation Element includes policies for the protection of native and landmark trees, non-native canopy which are consistent with the County Tree Preservation Ordinance (Chapter 19.04 and 19.12 of the County Code), and water quality in rivers and groundwater basins, which are crucial for supporting biological resources. When impacts on biological resources are unavoidable, the County implements mitigation programs to mitigate those impacts.[21] Relevant policies include, but are not limited to:

- **CO-58:** Ensure no net loss of wetlands, riparian woodlands, and oak woodlands.
- **CO-59:** Ensure mitigation occurs for any loss of or modification to the following types of acreage and habitat functions: Vernal pools, Wetlands, Riparian, Native vegetative habitat, and Special status species habitat.
- **CO-138:** Protect and preserve non-oak native trees along riparian areas if used by Swainson's Hawk, as well as landmark and native oak trees measuring a minimum of six (6) inches in diameter or 10 inches aggregate for multi-trunk trees at 4.5 feet above ground.
- **CO-139:** Native trees other than oaks, which cannot be protected through development, shall be replaced with in-kind species in accordance with established tree planting specifications, the combined diameter of which shall equal the combined diameter of the trees removed.

SOUTH SACRAMENTO HABITAT CONSERVATION PLAN

The project site and portions of the pipe alignment are located within the SSHCP, which is a regional approach to addressing development, habitat conservation and agricultural lands within south Sacramento County. The SSHCP encompasses a 317,000-acre area, including the cities of Galt and Rancho Cordova, and is divided into two components, inside the UDA, where all urbanization is proposed, and outside the UDA. The SSHCP covers 28 different species of plants and wildlife, including 10 that are state and/or federally-listed as threatened or endangered. The proposed project must comply with the provisions of the SSHCP and associated permits.[22]

The SSHCP identifies covered activities, such as construction projects, and acknowledges that they may directly and indirectly impact natural landcover types and species habitat. Covered activities may be carried out by the third-party project proponents with authorization of the Environmental Coordinator. The SSHCP includes a list of avoidance and minimization

[20] Sacramento County. (2017). General Plan. Conservation Element.
[21] Ibid.
[22] Sacramento County. (2018). Final South Sacramento Habitat Conservation Plan. Accessed December 31, 2025 from https://planning.saccounty.gov/PlansandProjectsIn-Progress/Documents/SSHCP/SSHCP_.pdf.

measures (AMMs) designed to streamline permitting processes while ensuring long-term conservation.

Additionally, the SSHCP includes a baseline map that outlines landcover types which are an interpretation of habitat based on remote sensing analysis over a number of years prior to the 2018 adoption of the final SSHCP. These landcover types are intended to serve as a guide to what would be present on the project site, to be updated and verified during the local impact authorization process through a project-specific field survey and wetland delineation.

IMPACT DISCUSSION

a. *Would the project have a substantially adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

Less Than Significant With Mitigation. Although the project impact footprint (i.e., RNG site, pipeline alignments, compressor station site, and M&R station site) has been previously developed, it is located within a rural portion of Sacramento County and supports habitat with the potential to contain special-status species.[23]. The project site and pipeline corridor have a high potential to support nine federally or state-listed wildlife species, including Crotch's bumble bee (*Bombus crotchii*), monarch butterfly (*Danaus plexippus plexippus*), Swainson's hawk (*Buteo swainsoni*), tricolored blackbird (*Agelaius tricolor*), vernal pool fairy shrimp (*Branchinecta lynchi*), vernal pool tadpole shrimp (*Lepidurus packardi*), western burrowing owl (*Athene cunicularia hypugaea*), western pond turtle (*Actinemys marmorata*), and western spadefoot (*Spea hammondii*).[24] Construction activities, including ground disturbance, could affect habitat features such as underground nests, flowering plants used by special-status insects, and nesting habitat for birds in adjacent trees, potentially resulting in nest disturbance or abandonment.

Additionally, the proposed project presents potential impacts to identified special status plant species including Boggs Lake hedge-hyssop (*Gratiola heterosepala*), Sacramento Orcutt grass (*Orcuttia viscida*), Slender Orcutt grass (*Orcuttia tenuis*), Ahart's dwarf rush (*Juncus leiospermis var. ahartii*), Legenere (*Legenere limosa*), Sanford's arrow (*Sagittaria sanfordii*), Spicate calycadenia (*Calycadenia spicata*) and Valley briodiaea (*Brodiaea rosea ssp. vallicola*).[25] Boggs lake hedge-hyssop, Sacramento Orcutt Grass and Slender Orcutt grass are federal or state listed plant species that occur within vernal pool habitats and have the potential to be disturbed by the proposed project. Potential disruptions from construction could lead to reduced populations sizes and death of plant species. The five non-listed special-status plant species with potential to occur in the study area are associated with vernal pool margins. Specifically, legenere, which was documented in four vernal pools within the BSA during protocol-level rare plant surveys in spring 2025, is restricted to vernal pool habitats and is associated with this habitat within the BSA. Potential impacts to these plant species include disturbance or loss of habitat and hydrologic changes that could reduce habitat stability. Pipeline installation equipment could additionally introduce invasive species into vernal pool environments. Any impacts that could lead to the death or reduced

[23] Vollmar Natural Lands Consulting. (2026). Biological Resources Evaluation – Appendix B.
[24] Vollmar Natural Lands Consulting. (2026). Special-Status Wildlife Habitat Assessment – Appendix D.
[25] Vollmar Natural Lands Consulting. (2026). Figure 2 Special-Status Plants Map, Rare Plant Survey Report – Appendix E.

population of these plants would be significant. However, incorporation of SSHCP general measures would provide the necessary habitat protections to reduce impacts to less than significant.

The project must obtain coverage for the project under the SSHCP, which includes submittal of all required documentation and implementation of all applicable SSHCP AMMs. This is addressed through Mitigation Measure BIO-1, Project Coverage under SSHCP. Further, implementation of Mitigation Measures BIO-2 through BIO-5 would reduce potential impacts to rare plants, Crotch's bumble bee, monarch butterflies, and western burrowing owl to less than significant.

On August 14, 2026, the California Fish and Game Commission approved the listing of the Western Spadefoot to a candidate species under CESA. Initial surveys for the project have been completed and potential habitat for Western Spadefoot was identified. Additional winter surveys are anticipated to be completed during the breeding season prior to start of construction of any portion of the project. Implementation of Mitigation Measure BIO-8 would reduce potential impacts to Western Spadefoot to a less than significant level.

b. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Less Than Significant With Mitigation. The project area, including the RNG Plant, pipeline alignments, and compressor/M&R station sites, contains approximately 0.7 acres of mixed riparian woodland, primarily along the margins of Mather Lake, Morrison Creek, and near Blodgett Reservoir, and 341.4 acres of valley grassland.[26] Construction activities have the potential to disturb portions of this habitat. The applicant would be required to obtain a signed SSHCP authorization form from the Environmental Coordinator for potential impacts to riparian and aquatic habitats. Additionally, the proposed project would comply with the requirements of the SSHCP, including adherence to the AMMs, payment of fees to support the overall SSHCP Conservation Strategy, and obtaining a Streambed Alteration Agreement from CDFW for potential impacts to riparian habitat. Consistent with these requirements, Mitigation Measure BIO-1 requires the applicant to obtain an SSHCP authorization prior to any project-related ground disturbing activities. With this measure in place, impacts on sensitive natural communities would be less than significant.

c. Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Less Than Significant With Mitigation. The project area contains approximately 8.5 acres of vernal pool, 3.4 acres of freshwater marsh, and 1.7 acres of seasonal wetlands.[27] The RNG pipeline would be located within several identified wetlands, including freshwater ponds (PUBFh), freshwater emergent wetlands (PEM1A), and riverine (R4SBC) habitat and would cross freshwater emergent wetland (PEM1Ch) and riverine (R5UBF) habitat.[28] None

[26] Vollmar Natural Lands Consulting. (2026). Figure 3 Natural Communities Map Biological Resource Evaluation – Appendix B.

[27] Ibid.

[28] California Department of Fish and Wildlife. (n.d.). National Wetlands Inventory. Accessed March 25, 2026 from https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/.

of these features are federally protected under the Clean Water Act. Construction in these locations, and in other environmentally sensitive areas, would use HDD when feasible to avoid disturbance and maintain habitat continuity. The proposed compressor and M&R station site contain no classified wetlands.[29] The applicant would be required to obtain a signed SSHCP authorization form from the Environmental Coordinator for potential impacts to aquatic habitats and would also be required to comply with Clean Water Act Sections 404 and 401 permitting requirements and a Streambed Alteration Agreement, as applicable. Further, the proposed project would comply with the requirements of the SSHCP, including adherence to the AMMs, such as maintaining at least a 250-foot buffer from vernal pools and using non-surface-disturbing construction methods such as directional drilling (with applicable Frac-Out Contingency Plans) in select areas, as described above, to avoid impacts to restrictive soil layers that support vernal pool hydrology, as well as payment of fees to support the overall SSHCP Conservation Strategy. Mitigation Measure BIO-1 requires the applicant to obtain an SSHCP authorization prior to project-related ground disturbing activities. Impacts related to sensitive natural communities would be less than significant with mitigation.

d. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less Than Significant With Mitigation. Wildlife corridors are pathways or habitat linkages that connect discrete areas of natural open space otherwise separated or fragmented by topography, changes in vegetation, and other natural or manmade obstacles such as urbanization.

The California Essential Habitat Connectivity project identifies major habitat corridors connecting large areas of open space. None are identified within the BSA; the nearest wildlife corridor is the Duck Creek North Fork - Coyote Creek corridor, which has its northern terminus just east of Kiefer Landfill. The SSHCP identifies only a single wildlife corridor, the Laguna Creek Corridor. This corridor has its start within the BSA at Blodgett Reservoir, where Laguna Creek crosses the unpaved portion of Kiefer Boulevard via a large box culvert. The SSHCP also identifies linkages, satellite preserves, and points where there are hydrologic crossings or dry wildlife road crossings connecting its existing or planned core preserves. Multiple linkages, satellite preserves, and crossings connect across Kiefer Boulevard, and Zinfandel Drive and Douglas Road each feature a single crossing within the BSA.

The project activities along these crossings would be temporary during construction of the pipeline alignments. Additionally, construction in this location, and in other environmentally sensitive areas, would use HDD to avoid disturbing the creek channel or adjacent habitat.[30] Although the site lies within an NSNF Wildlife Linkage Zone, HDD and SSHCP AMMs would maintain habitat continuity and allow wildlife movement to continue unimpeded. With these protections in place, impacts on wildlife connectivity would be less than significant.

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29 Ibid.

30 Sacramento County. (2018). Final South Sacramento Habitat Conservation Plan. Accessed December 31, 2025 from https://planning.saccounty.gov/PlansandProjectsIn-Progress/Documents/SSHCP/SSHCP_.pdf.

The trees within the project and within surrounding area may be used by migratory bird species for nesting. Due to the presence of large trees and signs of small mammal activity, raptors are also likely to use the site for foraging and nesting. Nesting raptors (and most other nesting birds) are protected under the California Fish and Game Code 3503. To ensure that nesting migratory birds are not impacted during construction, Mitigation Measures BIO-6 and BIO-7 are included to require pre-construction surveys prior to project-related construction activities and protection of any active nests, including raptors' nests, during construction. Therefore, impacts would be less than significant with mitigation.

e. Would the project adversely affect or result in the removal of native or landmark trees?

No Impact. The RNG plant, pipeline alignments, and compressor/M&R station sites would not require the removal of any native or landmark trees. Although the pipeline alignment passes near native trees, construction activities are not expected to require their removal, and no impact would occur.

f. Would the project conflict with any local policies or ordinances protecting biological resources?

Less Than Significant With Mitigation. The Biological Resources Evaluation indicates that the proposed project would not require removal of native or landmark trees and therefore would not conflict with local tree protection policies. However, portions of the project could affect riparian habitat, which is protected by policies in the Conservation Element of the Sacramento County General Plan. Implementation of Mitigation Measures BIO-1 would ensure that any potential impacts to riparian resources are avoided or minimized and that the project remains consistent with applicable local policies and ordinances protecting biological resources. Therefore, impacts would be less than significant with mitigation.

g. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Less Than Significant With Mitigation*.* The RNG site and pipeline alignments are located within the SSHCP Plan Area and are subject to its provisions and permitting requirements. Implementation of Mitigation Measure BIO-1 would ensure the project complies with all applicable SSHCP guidelines and AMMs. With adherence to these requirements, impacts related to the habitat conservation plan would be less than significant with mitigation.

Environmental Mitigation Measures

The following mitigation measure would be implemented during construction of the project to reduce potential impacts related to biological resources.

BIO-1: Project Coverage Under SSHCP

The project proponent shall obtain coverage for the project under the SSHCP with a signed SSHCP authorization form. This shall include submittal of all required application materials per SSHCP Section 10.4.2 and payment of all applicable fees consistent with current SSHCP requirements to mitigate for impacts to species and habitat prior to construction. All applicable fees shall be paid prior to ~~the issuance of a grading permit~~ ground disturbing activities for the project. If a grading permit is not required, fee payment agreement shall be fully executed prior

to issuance of the project's building permit. As part of the SSHCP authorization, impacts to land cover types would be evaluated. Impacts to Vernal Pool Fairy Shrimp, Midvalley Fairy Shrimp, and Vernal Pool Tadpole Shrimp are covered under the mitigation for impacts to Vernal Pools. Implementation of the Project will be required to comply with all applicable AMMs from the SSHCP to avoid and/or minimize impacts on habitat and special-status species that have a moderate or high potential to be located on or near the project site, including Swainson's Hawk, Tricolored Blackbird, Burrowing Owl (with the exception of AMM WBO-5), Western Spadefoot Toad, and Western Pond Turtle.

BIO-2: PRE-CONSTRUCTION RARE PLANTS SURVEY

Prior to ground disturbing activities, a pre-construction plant survey shall be performed during the appropriate blooming period for special status plant species that are not covered by the SSHCP with moderate to high potential of occurrence, Valley Brodiaea and Spicate Calycadenia, that may be impacted by construction activities. The surveys will be conducted in accordance with Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities,[31] or the most current protocols, specifically with respect to the number and timing of surveys, use of reference populations, and evaluation of negative findings. Results of the survey(s) will be submitted to Sacramento County Planning and Environmental Review. If the survey results are negative, no further action, and avoidance and minimization measures, is needed. If the survey finds that any special-status plant species are present, the survey report will include the location and description of all work areas, the location and description of all occupied habitat for special-status plant species, and identification of locations where effective avoidance measures could be implemented. The appropriate avoidance / protective measures shall be determined in coordination with the Environmental Coordinator and CDFW.

BIO-3: CROTCH'S BUMBLE BEE AVOIDANCE

Initial ground-disturbing work (e.g., grading, vegetation removal, staging) shall take place between August 15 and March 15, if feasible, to avoid impacts on nesting Crotch's bumble bees.

Regardless of the feasibility of the above limited operating period, a qualified biologist familiar with bumble bees of California and experienced using survey methods for bumble bees shall conduct a ~~habitat assessment and focused survey~~ Protocol Survey for Crotch's bumble bee before the start of any ground-disturbing activities. Surveys shall be performed when Crotch's bumble bee is most likely to be identified, typically from ~~April through August~~ March 1 through October 31 (i.e., the colony active period) when floral resources and ideal weather conditions are present, and shall follow the methods in Survey Considerations for CESA Candidate Bumble Bee Species.[32] Surveys shall be conducted during the colony active period closest to the start of planned construction activities. Survey results shall be submitted to the project applicant and Sacramento County no less than 7 days before construction begins.

[31] California Department of Fish and Wildlife. (2018). Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities. March 20. Available at: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959

[32] California Department of Fish and Wildlife. (2023). Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species. June 6. Available at: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150

- Crotch's Bumble Bee Protocol Survey. If Project activities are proposed to occur during the active season for CBB, Project Proponent shall develop a Pre-Construction Survey Plan for CBB and submit it to Sacramento County for acceptance, developed in coordination with CDFW (see https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150&inline). A total of three surveys shall be conducted prior to any ground-disturbing project activities or vegetation removal that will take place during the active season for CBB (March 1 through October 31), or until all flowering vegetation is largely desiccated, to determine if any active nests are within the project area. Each survey shall be spaced two to four weeks apart, unless otherwise authorized in writing by Sacramento County in coordination with CDFW, with the last survey taking place within 72 hours prior to construction activity. A Qualified Biologist shall perform meandering transects through the planned construction footprint, plus a 50-foot buffer where accessible, between 9:00 am and 1:00 pm where feasible and at least one hour after sunrise and at least two hours before sunset, to visually survey the area for CBB activity. The duration of the survey will be the minimum amount of time necessary to adequately survey the area, typically at least one hour of surveying per three acres of potential habitat, excluding capture, chilling, photo, identification, and release time. For each sampling event, the Qualified Biologist shall survey suitable habitat using non-lethal photo voucher and netting methods, developed in coordination with CDFW (see https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150&inline). If a suspected or confirmed CBB is identified during any of these surveys, the Qualified Biologist shall notify Sacramento County within 48 hours.

- If only foraging CBB or CBB nests are observed, a no-disturbance buffer of at least 50 feet from plants CBB have been identified as foraging from shall be established and the project proponent shall consult with Sacramento County and CDFW to demonstrate compliance with CESA.

- ~~The project applicant shall submit a survey report to CDFW within 1 month of survey completion and shall notify CDFW and Sacramento County within 24 hours if Crotch's bumble bees are detected.~~

- ~~If Crotch's bumble bees are detected during the focused survey, appropriate avoidance measures shall be implemented. Avoidance measures shall include, but not be limited to, the following:~~

    - ~~Protective buffers shall be implemented around active nesting colonies until these sites are no longer active. A qualified biologist, in coordination with CDFW, shall determine the appropriate buffer size to protect nesting colonies; however, the buffer shall be a minimum of 50 feet.~~

    - If impacts on Crotch's bumble bee cannot be avoided, project applicant shall obtain an ITP from CDFW and shall implement all avoidance measures included in the ITP.

    - If Crotch's bumble bee is added to the SSHCP as a covered species at a later date, any AMMs associated with this species shall supersede these measures. If Crotch's bumble bee is added to the SSHCP CDFW ITP at a later date, the project applicant shall obtain incidental take coverage for this species through participation in the SSHCP.

BIO-4: MONARCH BUTTERFLY AVOIDANCE

The following measures will be required to protect monarch butterflies prior to ESA (and, if applicable, CESA) listing. In the event monarch butterfly is ESA- and/or CESA-listed at the time of project construction, monarch butterfly protection requirements will instead adhere to the protocol(s) adopted by the listing agency/agencies (CDFW and/or USFWS).

- No more than two days prior to the initiation of vegetation trimming or removal for construction, the project proponent shall ensure that a qualified biologist approved by the County of Sacramento surveys all areas of potentially suitable habitat in the project area for monarch butterfly larval host plants.

- If host plants are found, the biologist shall survey all host plants for monarch eggs, larvae, and pupae. If no eggs, larvae, or pupae are found, plants may be removed within two days.

- If eggs, larvae, or pupae are present, host plants shall be protected in place until the biologist has determined that no more eggs, larvae, or pupae are present.

BIO-5: BURROWING OWL

On October 10, 2024, the California Fish and Game Commission accepted a petition to list western burrowing owl under CESA and designated the species as a candidate species. Pursuant to CESA, take of candidate species is prohibited. While western burrowing owl is a covered species under the SSHCP, the plan's CDFW 2081 Incidental Take Permit (ITP) does not include take coverage for the species. Pursuant to the SSHCP, the potential listing of western burrowing owl under CESA would be considered a changed circumstance that will trigger review by the SSHCP Technical Advisory Committee and an eventual amendment that will likely result in a change to the SSHCP, and addition of western burrowing owl to the SSHCP CDFW 2081 ITP.

In the interim period during which take coverage for western burrowing owl is not available through participation in the SSHCP, to avoid take of burrowing owl, the project applicant shall implement the following:

~~1. Burrowing Owl Surveys. Project proponent shall conduct a burrowing owl survey over all suitable habitat present within Project area. Burrowing owl surveys shall be conducted by a qualified biologist in accordance with the protocol described in the Staff Report on Burrowing Owl Mitigation (CDFW, March 7, 2012). If possible, surveys should be conducted during both the breeding (February 1 – August 31) and non-breeding seasons (September 1 – January 31) immediately preceding the planned start of construction activities to ascertain the seasonal residency status of any owls occupying the site. The presence of burrowing owl or their sign anywhere on the site or within a 500-foot accessible radius around the project site shall be recorded and mapped. Surveys shall disclose all burrows and occurrence of sign of burrowing owl on the project site and within the 500-foot buffer. Results of the survey shall be submitted to the County.~~

1. **Burrowing Owl Surveys.** Prior to beginning ground-disturbing project activities, a Qualified Biologist shall conduct at least four surveys using the methods described in most recent guidelines from CDFW's *Staff Report on Burrowing Owl Mitigation*, *Appendix D* (2012). Surveys shall be conducted during the breeding season (February 1 to August 31)

and include no fewer than four survey visits: at least one site visit between February 15 and April 15 and a minimum of three survey visits, at least three weeks apart, between April 15 and July 15, with at least one visit after June 15. Surveys shall also be conducted during the non-breeding season (September 1 to January 31) before the start of construction activities to determine seasonal residency. Nonbreeding season surveys shall consist of at least four visits, spread evenly, throughout the nonbreeding season. The presence of BUOW individuals, burrow complexes, or their sign (e.g., molted feathers, cast pellets, prey remains, eggshell fragments, owl whitewash, nest burrow decoration materials, etc.) anywhere onsite or within a 1,650-foot accessible radius around the project Area shall be recorded and mapped. The Qualified Biologist shall submit the results of the survey to Sacramento County prior to beginning project activities. If changes in BUOW presence are detected (e.g., BUOW have moved onsite or changed burrow use), the Qualified Biologist shall contact Sacramento County by phone or email within 24 hours of the observation to consult on appropriate measures to avoid impacts of the project to BUOW and the Qualified Biologist shall establish no-disturbance buffers. The Qualified Biologist could modify the nest buffer with written approval from Sacramento County in coordination with CDFW.

2. **Burrowing Owl Take Avoidance.** During the breeding season (February 1 to August 31), surveys shall document whether burrowing owl are nesting in or within ~~500~~ 1,650 feet of the project area. During the non-breeding season (September 1 to January 31), surveys shall document whether burrowing owl are using habitat in or directly adjacent to any area to be disturbed. Survey results shall only be valid for the season (breeding or non-breeding) during which the survey was conducted. If a lapse in project-related work of fifteen (15) calendar days or longer occurs, another focused survey and consultation with the County and CDFW shall be required before project work can be reinitiated. If a burrowing owl or evidence of presence at or near a burrow entrance is found to occur within ~~500~~ 1,650 feet of the project site, the following measures shall be implemented:

    - If burrowing owl are found during the non-breeding season (approximately September 1 to January 31), the ~~project applicant~~ qualified biologist shall establish a ~~minimum 160-foot (50-meter)~~ no-disturbance buffer zone around active burrows. The buffer zone shall be flagged or otherwise clearly marked. Measures such as visual screens may be used to further reduce the buffer with CDFW approval and provided a qualified biologist confirms that such measures do not cause agitated behavior.

    - If burrowing owl are found during the breeding season (approximately February 1 to August 31), the project applicant shall:

        - Avoid all nest sites that could be disturbed by project construction during the remainder of the breeding season or while the nest is occupied by adults or young (occupation includes individuals or family groups foraging on or near the site following fledging).

        - Establish a minimum ~~500~~ 1,650-foot non-disturbance buffer zone around nests, unless otherwise approved by the County in writing, in consultation with CDFW. The buffer zone shall be flagged or otherwise clearly marked. Should construction activities cause the nesting bird to vocalize, make defensive flights at intruders, or otherwise display agitated behavior, then the exclusionary buffer will be increased such that activities are far enough from

the nest so that the bird(s) no longer display this agitated behavior. Construction shall only occur within the 500-foot buffer zone during the breeding season if a qualified biologist monitors the nest and determines that the activities do not disturb nesting behavior, or the birds have not begun egg-laying and incubation, or that the juveniles from the occupied burrows have fledged and moved off site. Any modifications to this buffer shall be approved by the County, in consultation with CDFW prior to its implementation. The buffer reduction request shall include relevant information and/or propose new measures to justify the buffer reduction. The buffer area must be clearly marked to prevent project-related activities from occurring within the buffer zone.

3. **Eviction of Burrowing Owls.** If after all applicable avoidance and minimization measures are implemented and Project proponent needs to evict burrowing owl, an ITP shall be obtained for the activity and a burrowing owl eviction plan shall be developed by a qualified biologist for the County's review and approval, in consultation with CDFW. This plan, including its proposed mitigation, shall be consistent with the most recent available guidelines (e.g., 2012 Staff Report on Burrowing Owl Mitigation[33]). Burrow eviction shall only be conducted during the non-breeding season for burrows located in the project footprint, and in limited instances within a buffer zone around the project site, as determined by the County in consultation with CDFW after all avoidance and minimization measures have been exhausted.

BIO-6: NESTING BIRD PROTECTION

PRECONSTRUCTION SURVEYS FOR MIGRATORY AND NON-RAPTOR NESTING BIRDS

Adequate measures shall be taken to avoid inadvertent take of migratory bird nests when in active use. This shall be accomplished by taking the following steps:

- If construction is proposed during the nesting season (February 1 to September 15, inclusive), a survey for nesting birds shall be conducted by a qualified biologist within seven days prior to the onset of ground disturbing activities to identify any active nests (i.e., nests containing eggs and/or young) of migratory and/or non-raptor bird species. Surveys will be performed for the project site, vehicle and equipment staging areas, and suitable habitat within 500 feet for all migratory and/or non-raptor nesting birds of the project site to locate any active migratory bird nests. If project related work does not commence within seven days, or if there is a lapse in construction activities totaling seven days or more, additional surveys will be required.

- If no active nests are identified during the survey period, or if development is initiated during the non-breeding season, construction may proceed with no restrictions.

- If active nests are found, an adequate no-disturbance buffer shall be established around the nest location and construction activities shall be restricted within the buffer until a qualified biologist has confirmed that any young birds have fledged and are able to leave the construction area. Required setback distances for the no-disturbance buffer will be established by the qualified biologist and may vary depending on the species, line-of-

[33] California Department of Fish and Wildlife. (2012). Staff Report on Burrowing Owl Mitigation. March 7. Available at: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83843&inline=true

sight between the nest, and the construction activity, and the birds' sensitivity to disturbance. As necessary, the no-disturbance zone will be fenced with temporary orange construction fencing, high visibility rope, or a similar visual barrier if construction is to be initiated on the remainder of the development site. The buffer shall be kept in place until after the breeding nesting season or until a qualified biologist confirms the young have fledges, are foraging independently, and the nest is no longer active for the season.

- Any birds that begin nesting within the project site and survey buffers during construction activities will be assumed to be habituated to construction-related or similar noise and disturbance levels and no-disturbance zones shall not be established around active nests in these cases; however, should birds nesting within the project site and survey buffers during construction activities begin to show disturbance associated with construction activities, no-disturbance buffers shall be established as determined by the qualified wildlife biologist.

- A report of findings will be prepared by the qualified biologist and submitted to the County for review and approval prior to initiation of construction within the no-disturbance zone during the nesting season. The report will either confirm absence of any active nests or will confirm that any young within a designated no-disturbance zone have fledged and construction can proceed.

BIO-7: RAPTOR NEST PROTECTION

Adequate measures shall be taken to avoid inadvertent take of raptor nests when in active use. This shall be accomplished by taking the following steps.

- If construction is proposed during the nesting season (February 1st to September 15th, inclusive), a survey for nesting raptors shall be conducted by a qualified biologist within seven (7) days prior to the onset of vegetation removal, building demolition, or construction, to identify any active nests (i.e., nests containing eggs and/or young) of raptor bird species. Surveys shall be performed for the project site, vehicle and equipment staging areas, and suitable habitat within one half mile of the project site that can be accessed by the project proponent to locate any active raptor (bird of prey) nests. If project related work does not commence within seven (7) days or if there is a lapse in construction activities totaling seven (7) days or more, additional surveys will be required.

- If no active nests are identified during the survey period, or if development is initiated during the non-breeding season construction may proceed with no restrictions.

- If active raptor nests are found, an adequate no-disturbance buffer shall be established around the nest location and construction activities shall be restricted within the buffer until a qualified biologist has confirmed that any young birds have fledged and are able to leave the construction area. Required setback distances for the no-disturbance zone shall be established by the qualified biologist and may vary depending on species, line-of-sight between the nest, and the construction activity, and the birds' sensitivity to disturbance. As necessary, the no-disturbance zone shall be fenced with temporary orange construction fencing, high visibility rope, or a similar visual barrier if construction is to be initiated on the remainder of the development site. The buffer shall be kept in place until after the breeding nesting season or a qualified biologist confirms the young

have fledged, are foraging independently, and the nest is no longer active for the season.

- In the event that raptors begin nesting within the project site amid construction activities, an adequate no-disturbance buffer shall be established around the new nest location until a qualified biologist has confirmed that any young birds have fledged and are able to leave the construction area.

- All identified active raptor nests that may be subject to project related impacts shall be regularly monitored by a qualified biologist for any changes in behavior related to construction disturbance. If the qualified biologist observes that nesting raptors are disturbed by project related construction activities, all work activities shall cease until the qualified biologist identifies a revised no-disturbance zone.

- A report of findings shall be prepared by the qualified biologist and submitted to the County for review and approval prior to initiation of construction within the no-disturbance zone during the nesting season. The report shall either confirm absence of any active nests or shall confirm that any young within a designated no-disturbance zone and construction can proceed.

BIO-8: WESTERN SPADEFOOT AVOIDANCE

The California Fish and Game Commission received a petition on September 24, 2025, to list the western spadefoot as a candidate species under CESA and designated the species as a candidate species. Pursuant to CESA, take of candidate species is prohibited. While western spadefoot is a covered species under the SSHCP, the plan's CDFW 2081 Incidental Take Permit (ITP) does not include take coverage for the species. Pursuant to the SSHCP, the potential listing of western spadefoot under CESA would be considered a changed circumstance that will trigger review by the SSHCP Technical Advisory Committee and an eventual amendment that will likely result in a change to the SSHCP, and addition of western spadefoot to the SSHCP CDFW 2081 ITP.

In the interim period during which take coverage for western spadefoot is not available through participation in the SSHCP, to avoid take of western spadefoot, the project applicant shall implement the following:

1. Habitat Evaluation and Delineation. Prior to initiating Project activities, a Qualified Biologist shall conduct a winter larval survey within the project area footprint. If the evaluation concludes that larval forms of the Western Spadefoot are present within the project area footprint, Sacramento County shall be consulted in coordination with CDFW and USFWS.

2. The project applicant shall minimize, to the extent feasible, permanent or temporary, fixed, exterior lighting, including motion-triggered security lighting that casts light on western spadefoot habitat beyond the Project Area between sunset and sunrise. Nighttime construction lighting shall be shielded and oriented downward to minimize effects on any nearby western spadefoot habitat.

VI. CULTURAL RESOURCES

Would the project:	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	☐	☐	☐	☒
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☒	☐	☐
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☒	☐	☐

ENVIRONMENTAL SETTING

Potential impacts to cultural resources associated with the proposed project were determined from the results presented in the Cultural Resources Technical Report prepared for the proposed project, which is included as Appendix F to this IS/MND.

A California Historical Resources Information System (CHRIS) records search was conducted at the North Central Information Center in October 2024, and a combination of reconnaissance and systematic surveys were conducted of the project site on November 11, 2025. Additionally, a Sacred Lands File Search was requested on November 4, 2024.

The CHRIS records search identified 40 cultural resources studies within 0.25 miles of the project site. Of these studies, 13 include a portion of the project site and none include areas directly adjacent to the site. Additionally, the CHRIS records search identified 15 cultural resources within 0.25 miles of the project site consisting of seven historic-period archaeological sites (well, concrete and cobble stone foundations, concrete formed foundations, old fence posts, mining tailings, and ranching features), two historic-period isolates (concrete monument and water stand pipes, and an iron pipe), six historic-period built environment resources (Blodgett Reservoir, and structures associated with the former Mather Airforce Base), and one historic district (Douglas Missile Test Facility).

The records search results identified no precontact archaeological sites or precontact isolated artifacts within the 0.25-mile radius or within or immediately adjacent to the project alignments. One built environment resource, Blodgett Reservoir (P-34-05780), bisects the southern edge of the project alignment at Kiefer Boulevard.

REGULATORY SETTING

STATE

GOVERNMENT CODE SECTION 6254(R) AND 6254.10

These sections of the California Public Records Act were enacted to prevent archaeological sites from unauthorized excavation, looting, or vandalism. Section 6254(r) explicitly authorizes public agencies to withhold information from the public relating to "Native American graves,

cemeteries, and sacred places maintained by the Native American Heritage Commission (NAHC).

Similarly, Section 6254.10 specifically exempts from disclosure requests for "records that relate to archaeological site information and reports, maintained by, or in the procession of the Department of Parks and Recreation, the State Historical Resources Commission, the State Lands Commission, the NAHC, another state agency, or a local agency. This includes records that the agency obtains through a consultation process between a Native American tribe and a state or local agency".

California Public Resources Code Section 5097.98

Section 5097.98 of the California Public Resources Code (PRC) states that the NAHC, upon notification of the discovery of Native American human remains, pursuant to Health and Safety Code Section 7050.5, shall immediately notify those persons (i.e., the Most Likely Descendant [MLD]) that it believes to be descended from the deceased. With permission of the landowner or a designated representative, the MLD may inspect the remains and any associated cultural materials and make recommendations for treatment or disposition of the remains and associated grave goods. The MLD shall provide recommendations or preferences for treatment of the remains and associated cultural materials within 48 hours of being granted access to the site.

California Register of Historical Resources

The California Register of Historical Resources (CRHR) is a guide for state and local agencies, private groups, and the public to be used to identify state historical resources and identify properties to be protected from substantial adverse change to the extent prudent and feasible. Properties that are listed or eligible to be listed in the National Register of Historic Places (NRHP) and/or the California Historical Landmarks (CLH) are automatically included in the CRHR. Other properties identified as significant in historical resource surveys or designated by local landmarks programs, as recognized under the California Points of Interest Program, may be nominated for inclusion in the CRHR.

Eligibility for the CRHR includes one or more of the four criteria enumerated below. Additionally, the resource must retain integrity, evaluated using the retention of design, material, workmanship, location, feeling, and/or association.

1. The resource is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.

2. The resource is associated with the lives of persons important to local, Californian, or national history.

3. The resource embodies distinctive characteristics of a period, type, region, or method of construction, or represent the work of a master or possesses high artistic values.

4. The resource has yielded, or has the potential to yield, information important to the prehistory of the local area, California, or the nation.

CALIFORNIA HEALTH AND SAFETY CODE

Section 7050.5 of the California Health and Safety Code states that in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the Coroner of the county in which the remains are discovered has determined if the remains are subject to the Coroner's authority. If the human remains are of Native American origin, the Coroner must notify the NAHC within 24 hours of this identification.

LOCAL

SACRAMENTO COUNTY GENERAL PLAN

The Sacramento County General Plan Conservation Element provides goals, objectives, and policies for the management of cultural resources within unincorporated Sacramento County. The General Plan seeks to promote the inventory, protection and interpretation of cultural heritage, including historical and archaeological sites, buildings, and areas of ethnic, historical, and religious, or socio-economic importance. The Element aims to promote the inventory, protection, and interpretation of these resources for the benefit of present and future generations. Relevant policies from the Conservation Element are provided below:[34]

- **CO-150:** Utilize local, state, and national resources, such as the North Central Information Center (NCIC), to assist in determining the need for a cultural resource survey during project review.

- **CO-151:** Projects involving an adoption or amendment of a General Plan or Specific Plan or the designation of open space shall be noticed to all appropriate Native American tribes in order to aid in the protection of traditional tribal cultural places.

- **CO-152:** Consultations with Native American tribes shall be handled with confidentiality and respect regarding sensitive cultural resources on traditional tribal lands.

- **CO-155:** Native American burial sites encountered during preapproved survey or during construction shall, whenever possible, remain in situ. Excavation and reburial shall occur when in situ preservation is not possible or when the archeological significance of the site merits excavation and recording procedure. On-site reinterment shall have priority. The project developer shall provide the burden of proof that off-site reinterment is the only feasible alternative. Reinterment shall be the responsibility of local tribal representatives.

- **CO-156:** The cost of all excavation conducted prior to completion of the project shall be the responsibility of the project developer.

- **CO-157:** Monitor projects during construction to ensure crews follow proper reporting, safeguards, and procedures.

[34] Sacramento County. (2017). General Plan. Conservation Element. Accessed January 21, 2026 from https://planning.saccounty.gov/LandUseRegulationDocuments/Documents/General-Plan/Conservation%20Element%20-%20Amended%2009-26-17.pdf.

- **CO-158:** As a condition of approval of discretionary permits, a procedure shall be included to cover the potential discovery of archaeological resources during development or construction.

- **CO-159:** Request a Native American Statement as part of the environmental review process on development projects with identified cultural resources.

- **CO-161:** As a condition of approval for discretionary projects, require appropriate mitigation to reduce potential impacts where development could adversely affect paleontological resources.

- **CO-162:** Projects located within areas known to be sensitive for paleontological resources should be monitored to ensure proper treatment of resources and to ensure crews follow proper reporting, safeguards and procedures.

- **CO-163:** Require that a certified geologist or paleoresources consultant determine appropriate protection measures when resources are discovered during the course of development and land altering activities.

- **CO-167:** When conducting planning studies, the Office of Planning and Environmental Review shall encourage the adaptive reuse of historic resources when the original use is no longer feasible or allowed under proposed area planning efforts.

- **CO-169:** Restrict the circulation of cultural resource location information to prevent potential site vandalism. This information is exempt from the "Freedom of Information Act".

- **CO-170:** Cooperate with other agencies to enforce laws and aggressively prosecute illegal collection of artifacts.

Impact Discussion

a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

No Impact. The CHRIS records search conducted as part of the cultural resources technical report identified one built environment resource, Blodgett Reservoir. The reservoir was previously evaluated and recommended as ineligible for the NRHP and CRHR. The reservoir has no known relationship with historically significant people or events. Additionally, no artifacts have been identified in association with the resource to indicate need for additional research. Therefore, the project would have no impact to historical resources.

b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Less Than Significant With Mitigation. The CHRIS records search combined with archival research, a geoarchaeological review, and an intensive field survey, identified no archaeological resources or cultural deposits within the project site. This absence is consistent with established Valley Nisenan settlement patterns, which indicate that permanent villages and resource-intensive activities were concentrated along major river

corridors rather than on upland terrace landforms like those present at the project site. Ethnographic accounts similarly describe subsistence practices focused on riparian environments along the American and Sacramento Rivers, further supporting the low likelihood of pre-contact occupation in the project area.

Although no surface archaeological materials were observed, alluvial settings can occasionally contain buried cultural deposits. To address the possibility of encountering buried resources, Mitigation Measure CUL-1 for unanticipated discoveries would be implemented during construction.

With adherence to Mitigation Measure CUL-1, the proposed project would not cause a substantial adverse change in the significance of an archaeological resource under CEQA Guidelines Section 15064.5, and impacts would be less than significant with mitigation.

c. Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant With Mitigation. There are no known human remains or cemeteries located within or in the immediate vicinity of the project area. The discovery of human remains is always a possibility during ground disturbing activities. If human remains are found, the State of California Health and Safety Code section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. In the event of an unanticipated discovery of human remains, the County Coroner must be notified immediately. If the human remains are determined to be of Native American origin, the Coroner will notify the NAHC, which will determine and notify an MLD. The MLD has 48 hours from being granted site access to make recommendations for the disposition of the remains. If the MLD does not make recommendations within 48 hours, the landowner shall reinter the remains in an area of the property secure from subsequent disturbance. With adherence to existing regulations, which are further specified in Mitigation Measure CUL-2, impacts would be less than significant.

Environmental Mitigation Measures

The following mitigation measure would be implemented during construction of the project to reduce potential impacts related to cultural resources.

CUL-1: Unanticipated Discovery of Cultural Resources

In the event of an inadvertent discovery of cultural resources (excluding human remains) during construction, all work must halt within a 100-foot radius of the discovery. A qualified professional archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for indigenous and historic archaeology shall be retained at the Contractor's expense to evaluate the significance of the find. If an unanticipated discovery is determined to be a tribal cultural resource (TCR), the contractor shall defer to the standards and protocols to the consulting tribe.

1. Work cannot continue within the 100-foot radius of the discovery site until the archaeologist and/or tribal monitor conducts sufficient research and data collection to decide that the resource is either 1) not cultural in origin; or 2) not potentially eligible for listing on the National Register of Historic Places (NRHP) or California Register of Historical Resources (CRHR).

2. If a potentially eligible resource is encountered, then the archaeologist and/or tribal monitor, Planning and Environmental Review staff, and contractor shall arrange for the following: 1) total avoidance of the resource, if possible; 2) assessed for eligibility for listing in the NRHP/CRHR 3) test excavations or total data recovery as mitigation. The determination shall be formally documented in writing and submitted to the County Environmental Coordinator as verification that the provisions of CEQA for managing unanticipated discoveries have been met.

CUL-2: UNANTICIPATED DISCOVERY OF HUMAN REMAINS

Pursuant to Sections 5097.97 and 5097.98 of the State Public Resources Code, and Section 7050.5 of the State Health and Safety Code, if a human bone or bone of unknown origin is found during construction, all work is to stop, and the County Coroner, and Wilton Rancheria shall be immediately notified. If the remains are determined to be Native American, the coroner shall notify the Native American Heritage Commission within 24 hours, and the Native American Heritage Commission shall identify the person or persons it believes to be the most likely descendent from the deceased Native American. The most likely descendent may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposition of, with appropriate dignity, the human remains and any associated grave goods. Work may not proceed until the County has provided a reasonable path for work to resume.

VII. ENERGY

Would the project:	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Information within this section for the Distribution Connection Route (Option 1) and the Transmission Connection Route (Option 2) is primarily based upon the California Emissions Estimator Model (CalEEMod) version 2022.1 outputs within the *Kiefer Landfill Gas Utilization Project Air Quality and Greenhouse Gas Study* (Pipeline Emissions Study), prepared by Rincon Consultants, Inc., dated April 2026; refer to Appendix A.

ENVIRONMENTAL SETTING

The Sacramento Municipal Utility District (SMUD) is the primary provider of electric service in the project site area.[35] Pacific Gas and Electric Company (PG&E) provide natural gas to the area.

[35] Sacramento Local Agency Formation Commission (LAFCo). (n.d.). Sacramento Municipal Utility District Map. ArcGIS. Accessed December 31, 2025, from https://lafco-sacramentocounty.opendata.arcgis.com/datasets/sacramento-municipal-utility-district/explore

REGULATORY SETTING

The California Building Standards Code, Title 24, applies to all building occupancies, and related features and equipment, throughout California. The California Green Building Standards Code (CALGreen Code) is a subsection of Title 24 which mandates green building standard code for all buildings within the State.

Section 2449 of the California Code of Regulations, Title 13, Chapter 9, Article 4.8 requires minimizing non-essential idling of construction equipment during construction. This requirement applies to all construction activities.

THRESHOLDS OF SIGNIFICANCE

Appendix F of the CEQA Guidelines is an advisory document that assists environmental document preparers in determining whether a project will result in the inefficient, wasteful, and unnecessary consumption of energy. The analysis relies upon Appendix F of the CEQA Guidelines, which includes the following criteria to determine whether this threshold of significance is met:

- **Criterion 1**: The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance and/or removal. If appropriate, the energy intensiveness of materials may be discussed.

- **Criterion 2**: The effects of the project on local and regional energy supplies and on requirements for additional capacity.

- **Criterion 3**: The effects of the project on peak and base period demands for electricity and other forms of energy.

- **Criterion 4**: The degree to which the project complies with existing energy standards.

- **Criterion 5**: The effects of the project on energy resources.

- **Criterion 6**: The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

Quantification of the project's energy usage is presented and addresses **Criterion 1**. The discussion on construction-related energy use focuses on **Criteria 2**, **4**, and **5**. The discussion on operational energy use focuses on **Criteria 2**, **3**, **4**, **5**, and **6.**

IMPACT DISCUSSION

a. *Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*

Less Than Significant Impact.

Construction Energy Consumption

Project construction-related energy consumption would primarily result from diesel fuel use associated with off-road construction equipment, on-road haul truck and vendor trips, as well as gasoline consumption from on-road worker trips. CalEEMod was utilized to calculate the project's construction consumption, based on the project's construction equipment list, construction phasing, anticipated construction schedule, and construction equipment duration. The project's estimated construction energy consumption is summarized in **Table IS-6**. Refer to Appendix A for CalEEMod outputs and energy calculations.

Table IS-6: Project Construction Energy Consumption

Source	Project Annual Energy Consumption[1]	Sacramento County Annual Energy Consumption[2]	Percentage Increase Countywide
RNG Plant + Option 1: Distribution Connection Route			
Diesel Use			
Off-Road Construction Equipment	89,810 gallons	119,654,090 gallons	0.0751%
On-Road Construction Trips	20,012 gallons	119,654,090 gallons	0.0167%
Construction Diesel Total	109,822 gallons	119,654,090 gallons	0.0918%
Gasoline Use			
On-Road Construction Trips	6,302 gallons	412,208,479 gallons	0.0015%
RNG Plant + Option 2: Transmission Connection Route			
Diesel Use			
Off-Road Construction Equipment	126,700 gallons	119,654,090 gallons	0.1059%
On-Road Construction Trips	20,012 gallons	119,654,090 gallons	0.0167%
Construction Diesel Total	146,711 gallons	119,654,090 gallons	0.1226%
Gasoline Use			
On-Road Construction Trips	9,565 gallons	412,208,479 gallons	0.0023%

1 Construction fuel consumption was calculated based on California Emissions Estimator Model Version 2022.1 (CalEEMod) emissions outputs and conversion ratios from the U.S. Environmental Protection Agency.

2 Countywide fuel consumption is from CARB EMFAC2025 in Sacramento County for construction year 2027 (first year of construction).

Source: CalEEMod; Pipeline Emissions Study; refer to Appendix A.

During construction, the project would consume energy in two general forms: (1) the fuel energy consumed by construction vehicles and equipment; and (2) bound energy in construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

Fuel energy consumed during construction would be temporary and would not represent a significant demand on energy resources. In addition, some incidental energy conservation would occur during construction through compliance with State requirements that heavy-duty diesel equipment not in use for more than five minutes be turned off. Project construction equipment would also be required to comply with the latest USEPA and CARB engine emissions standards. These emissions standards require highly efficient combustion systems that maximize fuel efficiency and reduce unnecessary fuel consumption. Due to increasing transportation costs and fuel prices, contractors and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction (**Criterion 4** and **5**).

The project-related incremental increase in the use of energy bound in construction materials, such as asphalt, steel, concrete, pipes and manufactured or processed materials (e.g., lumber and gas), would not substantially increase demand for energy compared to overall local and regional demand for construction materials. As indicated in **Table IS-6**, the RNG Plant + Option 1: Distribution Connection Route scenario construction diesel fuel consumption would be approximately 109,822 gallons, which would account for 0.0918 percent of the County's annual diesel fuel consumption, and construction gasoline fuel consumption would be approximately 6,302 gallons, which would account for approximately 0.0015 percent of the County's annual gasoline fuel consumption. Additionally, the RNG Plant + Option 2: Transmission Connection Route scenario construction diesel fuel consumption would be approximately 146,711 gallons, which would account for 0.1226 percent of the County's annual diesel fuel consumption, and construction gasoline fuel consumption would be approximately 9,565 gallons, which would account for approximately 0.0023 percent of the County's annual gasoline fuel consumption. As such, project construction would have a minimal effect on the local and regional energy supplies and would not require additional capacity (**Criterion 2**).

Construction fuel use is temporary and would cease upon completion of construction activities. Construction activities would be planned and sequenced to maximize the efficiency of construction. Therefore, there are no unusual project characteristics that would necessitate the use of construction equipment that would be less energy-efficient than at comparable construction sites in the region or State (**Criterion 5**). Additionally, construction contractors would be required to comply with the provisions of California Code of Regulations Title 13, Sections 2449 and 2485, which prohibit diesel-fueled commercial motor vehicles and off-road diesel vehicles from idling for more than five minutes and would minimize unnecessary fuel consumption. Construction equipment would be subject to the USEPA Construction Equipment Fuel Efficiency Standard, which would also minimize inefficient, wasteful, or unnecessary fuel consumption. Furthermore, the project would comply with applicable regulatory requirements including CALGreen. The latest CALGreen requires that all "New Construction" (pursuant to the Green Building Code) are required to divert 65 percent of the construction materials generated during construction. Therefore, construction fuel consumption would not be any more inefficient, wasteful, or unnecessary than other similar development projects, and a less than significant impact would occur in this regard during project construction.

Operational Energy Consumption

The project proposes development of a renewable natural gas (RNG) plant at the Kiefer Landfill, with a pipeline connection to existing PG&E natural gas infrastructure via either the Distribution Connection Route (Option 1) or the Transmission Connection Route (Option 2). Operation of the RNG plant would convert landfill gas to RNG for pipeline injection, replacing on-site electricity generation while maintaining existing landfill gas management infrastructure as needed. Treatment units associated with RNG production would require utility-supplied electricity to support processing equipment and ancillary or "parasitic" loads, including control systems, lighting, HVAC, and monitoring equipment.

The RNG plant would also generate minimal operational vehicle trips. Operational vehicle activity would include wastewater hauling to the EchoWater Resources Recovery Facility, daily employee commute trips, routine delivery truck visits, and periodic service and maintenance activities using pickup trucks, utility trucks, box trucks, and vacuum trucks. In total, the project would generate up to 14 daily vehicle trips; refer to Appendix A for detailed vehicle trip assumptions. The annual operational energy generation and consumption associated with the RNG plant is shown in **Table IS-7**. RNG plant electricity and natural gas assumptions, as well as vehicle trips, were provided by the project applicant; refer to Appendix A.

The pipeline connection to existing PG&E natural gas infrastructure via either the Distribution Connection Route (Option 1) or the Transmission Connection Route (Option 2) would result in energy consumption associated with electricity, natural gas, and transportation fuel associated with vehicle trips for worker operation and maintenance. Electricity and natural gas consumption would primarily be associated with the proposed compressor station. It should be noted that this analysis conservatively assumes the compressor station would be built under both the Distribution Connection Route (Option 1) and the Transmission Connection Route (Option 2) scenarios.[36] **Table IS-7** also presents the annual operational energy consumption associated with the Distribution Connection Route (Option 1) and the Transmission Connection Route (Option 2) scenarios. Option 1 and Option 2 energy consumption is based on CalEEMod outputs within the Pipeline Emissions Study; refer to Appendix A.

[36] Rincon Consultants, Inc., Kiefer Landfill Gas Utilization Project Air Quality and Greenhouse Gas Study, April 2026.

Table IS-7: Project Operational Energy Consumption

Source	Annual Energy
RNG Plant[1]	
Electricity	
Generation	37,431 MWh
Consumption	87,600 MWh
Net Consumption	*50,169 MWh*
Natural Gas	
Generation	18,684,000 Therms
Consumption	9,134,400 Therms
Net Consumption	*-9,549,600 Therms*
Fuel	
Consumption	4,990 gallons
Option 1: Distribution Connection Route[2]	
Electricity	
Consumption	225 MWh
Natural Gas	
Consumption	9,886 Therms
Fuel	
Consumption	20,549 gallons
Option 2: Transmission Connection Route[2]	
Electricity	
Consumption	225 MWh
Natural Gas	
Consumption	9,886 Therms
Fuel	
Consumption	20,549 gallons
RNG Plant + Option 1: Distribution Connection Route	
Electricity	
Project Consumption	50,394 MWh
Sacramento County Annual Consumption	11,381,000 MWh
% Increase Countywide	0.4%

Table IS-7: Project Operational Energy Consumption

Source	Annual Energy
Natural Gas	
Project Consumption	-9,539,714 Therms
Sacramento County Annual Consumption	285,000,000 Therms
% Decrease Countywide	-3.3%
Fuel	
Project Consumption	25,539 gallons
Sacramento County Annual Consumption	531,862,569 gallons
% Increase Countywide	0.005%
RNG Plant + Option 2: Transmission Connection Route[3,4,5]	
Electricity	
Project Consumption	50,394 MWh
Sacramento County Annual Consumption	11,381,000 MWh
% Increase Countywide	0.4%
Natural Gas	
Project Consumption	-9,539,714 Therms
Sacramento County Annual Consumption	285,000,000 Therms
% Decrease Countywide	-3.3%
Fuel	
Project Consumption	25,539 gallons
Sacramento County Annual Consumption	531,862,569 gallons
% Increase Countywide	0.005%

MWh = megawatt hour; RNG = renewable natural gas

1 *Electricity and natural gas generation and consumption provided by the project applicant. Fuel consumption is based on trips provided by the project applicant.*

2 *Option 1 and Option 2 electricity, natural gas, and fuel consumption based on the CalEEMod outputs within Pipeline Emissions Study.*

3 *The project's increase in electricity consumption and decrease in natural gas consumption is compared to the total consumption in Sacramento County in 2024 (latest year where data is available). The project increases in fuel consumption is compared with the projected Countywide fuel consumption in 2028 (first year of operation) from EMFAC2025.*

4 *Electricity consumption data source: California Energy Commission, Electricity Consumption, https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/california-energy-consumption-dashboards-0, accessed March 17, 2026.*

5 *Natural Gas consumption data source: California Energy Commission, Natural Gas Consumption, https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/california-energy-consumption-dashboards-1, accessed March 17, 2026.*

Source: CalEEMod; Pipeline Emissions Study; refer to Appendix A.

Electricity

The SMUD provides electricity for the project area. Total electricity demand in SMUD's service area is forecast to increase by approximately 2,568 gigawatt hours (GWh), or 2.568 million megawatt hours (MWh), between 2027 and 2040.[37]

Project estimated operational electrical demand would total approximately 50,394 MWh per year. This would represent approximately 2 percent of SMUD's forecasted 2040 increased demand. Therefore, the project would result in a negligible increased demand compared to SMUD's overall demand (**Criterion 2** and **5**). Electricity demand associated with the project would be consistent with that of other RNG plant and compressor station projects and would not result in unique or disproportionately high peak or base electricity demand (**Criterion 3**).

The project would comply with all applicable federal, State, and local energy standards. Facility design and construction would be subject to the requirements of Title 24 standards, including the California Building Energy Efficiency Standards (Part 6) and the California Green Building Standards Code (CALGreen), as applicable. Equipment associated with the RNG plant, including treatment units, compressors, control systems, lighting, HVAC, and auxiliary systems, would be designed and operated in compliance with applicable efficiency standards and manufacturer specifications (**Criterion 4**).

Natural Gas

PG&E supplies natural gas to the project area. As shown in **Table IS-7,** the project would result in a net increase of 9,539,714 therms due to the RNG plant. Therefore, the project would represent a net reduction of 3.3 percent in Countywide usage. As such, the project would not require additional energy capacity or supplies (**Criteria 1**, **2**, and **5**).

Transportation Fuel

As indicated in **Table IS-7**, the project's operational transportation fuel consumption would be approximately 25,539 gallons per year. The project-related mobile sources would account for approximately 0.005 percent of the County's forecasted annual consumption of fuel starting in 2028 (first year of operation). The proposed project would account for a nominal percentage of the forecasted annual operational automotive fuel consumption for the County and, thus, would have a nominal effect on the local and regional energy supplies. (**Criteria 1**, **2**, and **6**).

Conclusion

As shown in **Table IS-7,** the project's operational energy from electricity and transportation would represent less than one percent of Countywide usage. Additionally, natural gas generation from the RNG plant would result in a net reduction of 3.3 percent in Countywide usage. The project would also adhere to all federal, State, and local requirements for energy efficiency. As such, the project would not result in a substantial increase in demand for electricity transmission or natural gas services, resulting in the need for new or expanded sources of energy supply or new or expanded energy delivery systems or infrastructure.

[37] California Energy Commission. (2024). California Energy Demand, 2024-2040, CEDU 2024 Baseline Forecast – SMUD, Accessed April 16, 2026 from https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report-iepr/2024-integrated-energy-policy-report-0.

Therefore, the proposed project would not cause wasteful, inefficient, or unnecessary consumption of energy resources during operation. Impacts would be less than significant.

b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less Than Significant Impact. The project would not conflict with or obstruct any adopted State or local renewable energy or energy efficiency plan. The project is consistent with the Sacramento County General Plan and Climate Action Plan by supporting goals related to methane reduction, renewable energy production, and efficient landfill gas management. In addition, the project aligns with statewide policies, including SB 350, SB 100, and the California Air Resources Board Scoping Plan, which promote renewable fuel generation and reduced reliance on fossil-derived natural gas. The project advances State and local clean-energy objectives by converting landfill gas, that would otherwise be flared, into renewable natural gas. Impacts would be less than significant.

Environmental Mitigation Measures

None recommended.

VIII. Geology and Soils

Would the project:	**Potentially Significant**	**Less than Significant with Mitigation**	**Less than Significant**	**No Impact**
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
iv. Landslides?	☐	☐	☐	☒
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☐	☒

d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

Environmental Setting

Regional Geography

The RNG plant, pipeline alignments, and compressor/M&R station sites lie within the Great Valley geomorphic province of California (the Great Valley), which is a gently sloping relatively flat alluvial plain. The Great Valley is bounded by the Coast Mountain Ranges on the west, the Sierra Nevada on the east, and the Klamath and Cascade Mountain Ranges on the north.[38]

The landfill site is categorized as predominately Redding gravelly loam. A loamy alluvium derived from igneous, metamorphic and sedimentary rock over clayey alluvium and over cemented alluvium.[39] Around 20 percent of the landfill site is comprised of Handselville-Pentz complex, a moderately drained soil derived from residuum weathered from sedimentary rock. The remaining site contains both clay and loam soils that are well drained with a high runoff class.[40] The pipeline area contains a wide variety of soils but is mostly comprised of Redding gravelly loam and other clay and loam soils.[41]

Seismic Hazards

Faults and Seismicity

The RNG plant, pipeline alignments, and compressor/M&R station sites are not located near or on any Alquist-Priolo Faults or any Quaternary Faults.[42,43] The closest Quaternary fault is the Foothills fault system which is located approximately 19.4 miles southeast from the RNG plant.

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38 California Department of Conservation. (2019). The California Geotour. Accessed December 31, 2025 from https://www.conservation.ca.gov/cgs/california-geotour.

39 U.S. Department of Agriculture. (n.d.). Web Soil Survey. Accessed December 31, 2025 from https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx.

40 Ibid.

41 Ibid.

42 California Geological Survey. (n.d.). Alquist-Priolo Fault Hazard Zone. Accessed December 31, 2025 from https://hub.arcgis.com/datasets/cadoc::cgs-seismic-hazards-program-alquist-priolo-fault-hazard-zones/explore?location=38.521995%2C-121.203192%2C13.40.

43 U.S. Geological Survey. (n.d.). U.S. Quaternary Faults Map. ArcGIS. Accessed December 31, 2025 from https://usgs.maps.arcgis.com/apps/webappviewer/index.html?id=5a6038b3a1684561a9b0aadf88412fcf.

Additionally, the closest Alquist-Priolo Fault is the Green Valley Fault, located approximately 54 miles west of the RNG plant in Rockville.[44]

LIQUEFACTION AND LANDSLIDES

As mentioned above, the RNG plant, pipeline alignments, and compressor/M&R station sites lie on a relatively flat alluvial plain and therefore has a low susceptibility to landslides.[45] Additionally, the project site is not located within or near any liquefaction zones.[46]

PALEONTOLOGICAL RESOURCES

Paleontological resources consist of fossilized remains or traces of past organisms preserved within the geologic record. These resources are considered nonrenewable and are protected under applicable state, federal, and local regulations. The project area has been previously developed as a landfill and is therefore expected to contain primarily Holocene-age artificial fill in near-surface deposits. Geologic mapping indicates that this fill is underlain by nonmarine sedimentary units of Pliocene-Pleistocene age, including loosely consolidated sandstone, shale, and gravel.[47] Pleistocene-age deposits are known to have the potential to contain significant paleontological resources.

REGULATORY SETTING

STATE

ALQUIST-PRIOLO EARTHQUAKE FAULT ZONING ACT

The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to protect structures for human occupancy from the hazard of surface faulting. In accordance with the act, the State Geologist has established regulatory zones called earthquake fault zones around the surface traces of active faults and has published maps showing these zones. Buildings for human occupancy cannot be constructed across surface traces of faults that are determined to be active. Because many active faults are complex and consist of more than one branch that may experience ground surface rupture, earthquake fault zones extend approximately 200 to 500 feet on either side of the mapped fault trace.

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44 California Geological Survey. (n.d.). Alquist-Priolo Fault Hazard Zone. Accessed January 16, 2026 from https://hub.arcgis.com/datasets/cadoc::cgs-seismic-hazards-program-alquist-priolo-fault-hazard-zones/explore?location=38.521995%2C-121.203192%2C13.40.

45 U.S. Geological Survey. (n.d.). U.S. Landslide Inventory and Susceptibility. ArcGIS. Accessed January 12, 2025 from https://usgs.maps.arcgis.com/apps/webappviewer/index.html?id=ae120962f459434b8c904b456c82669d.

46 California Department of Conservation. (2025). California Geological Survey Liquefaction Zones. ArcGIS. Accessed January 12, 2025 from https://www.arcgis.com/home/item.html?id=fcf1ebfe19be49819a12c404d74b4a7d.

47 California Department of Conservation. (n.d.). Geologic Map of California. California Geological Survey. Accessed January 12, 2026 from https://maps.conservation.ca.gov/cgs/gmc/.

CALIFORNIA BUILDING CODE

The proposed project would be subject to the applicable sections of California Building Code (CBC) Title 24, Part 2, which is administered by the California Building Standards Commission. Under state law, all building standards must be centralized in Title 24 to be enforceable. The CBC contains necessary California amendments, which are based on American Society of Civil Engineers/Structural Engineering Institute Standards. These standards provide requirements for general structural design and include means for determining earthquake loads, as well as other loads for inclusion into building codes. The earthquake design requirements take into account the occupancy category of the structure, site class, soil classifications, and various seismic coefficients, which are used to determine a seismic design category for a project. Once a project is categorized according to a seismic design category, design specifications can be determined. The provisions of the CBC apply to the construction, alteration, movement, replacement, and demolition of every building or structure, or any appurtenances connected or attached to such buildings or structures, throughout California.

LOCAL

SACRAMENTO COUNTY LAND GRADING AND EROSION CONTROL

The Sacramento County Land Grading and Erosion Control Ordinance aims to minimize the damage to surrounding properties and public rights-of-way, the degradation of the water quality of watercourses, and the disruption of natural or County authorized drainage flows caused by the activities of clearing, grading, filling, and excavating land. The ordinance establishes administrative procedures, minimum standards of review, and implementation and enforcement procedures for the control of erosion and sedimentation that are directly related to land grading activities.

IMPACT DISCUSSION

a. *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:*

    i. *Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.*

        No Impact. As mentioned above, the RNG plant, pipeline, and compressor/M&R station sites are not located within or adjacent to a fault zone within the Alquist-Priolo Fault Hazard Zone. The nearest fault zone is approximately 54 miles west of the RNG plant.[48] Therefore, implementation of the project would not directly or indirectly cause adverse effects involving the rupture of a known Alquist-Priolo fault, and no impacts would occur.

[48] California Geological Survey. (n.d.). Alquist-Priolo Fault Hazard Zone. Accessed January 16, 2026 from https://hub.arcgis.com/datasets/cadoc::cgs-seismic-hazards-program-alquist-priolo-fault-hazard-zones/explore?location=38.521995%2C-121.203192%2C13.40.

ii. Strong seismic ground shaking?

Less Than Significant Impact. The nearest Quaternary fault to the RNG plant is the Foothills Fault System, located approximately 19.4 miles southeast of the project site. Ground-shaking intensity during an earthquake depends on factors such as distance from the epicenter, earthquake magnitude, and local soil conditions. According to the 2025 Earthquake Shaking Potential for California map, the project area could experience severe shaking (corresponding to Modified Mercalli Intensity VII).[49,50] All new developments in Sacramento County must comply with the California Building Code (CBC), which requires structures to be designed to withstand expected seismic forces. With adherence to applicable CBC seismic design standards, the project would avoid substantial risk from seismic shaking. In addition, the project would not exacerbate any potential adverse effects of ground shaking. Impacts in this regard would be less than significant.

iii. Seismic-related ground failure, including liquefaction?

No Impact. Liquefaction occurs when strong ground shaking causes saturated, loose soils to lose strength and behave like fluid. Susceptibility depends on factors such as soil type, groundwater depth, and shaking intensity. The RNG plant, pipeline alignments, and compressor/M&R station sites are not located within a mapped liquefaction hazard zone, and local subsurface conditions do not indicate a risk of liquefaction. Additionally, compliance with CBC requirements for grading, foundations, and structural design would ensure that potential liquefaction-related hazards are reduced or avoided. Therefore, no impact would occur.

iv. Landslides?

No Impact. The RNG plant, pipeline alignments, and compressor/M&R station sites area relatively flat and are not located in a landslide hazard zone.[51] Therefore, no impact would occur.

b. Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact*.* Construction activities, including site clearing and grubbing, earthmoving, and excavation, have the potential to temporarily disturb soils and expose them to potential wind and water-driven erosion. During construction, the contractor would be required to comply with all applicable requirements of the County's Land Grading and Erosion Control Ordinance, which establishes standards for managing disturbed soils and preventing off-site sedimentation. Because the project would disturb more than one acre, a Stormwater Pollution Prevention Plan (SWPPP) would also be required. The SWPPP would incorporate best management practices (BMPs) such as erosion controls, sediment barriers, and proper soil stockpile management throughout construction. With implementation of

[49] Department of Conservation. (n.d.). California Geological Survey. MMI Hazard Map. Accessed January 16, 2026 from https://maps.conservation.ca.gov/cgs/ms48/mmi/.

[50] Department of Conservation. (2025). California Geological Survey. Earthquake Shaking Potential.

[51] U.S. Geological Survey. (n.d.). U.S. Landslide Inventory and Susceptibility. ArcGIS. Accessed January 12, 2025 from https://usgs.maps.arcgis.com/apps/webappviewer/index.html?id=ae120962f459434b8c904b456c82669d.

these mandatory measures, construction would not result in substantial soil erosion, and impacts would be less than significant.

c. *Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?*

No Impact. The RNG plant, pipeline, and compressor/M&R station sites are characterized primarily by clay and loam soils, which are generally stable and not prone to geologic hazards. The area is underlain by well-consolidated Pleistocene-age deposits that provide a firm foundation. Because the site has been previously developed and does not contain unstable geologic conditions, the project would not create or exacerbate soil-related risks. U.S. Geological Survey (USGS) mapping also confirms that the site is not located within an areas of land subsidence.[52] Additionally, conformance to the CBC, standard engineering practices, and design criteria would reduce the potential for substantial risks as a result of unstable soils. Therefore, no impact would occur.

d. *Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?*

Less Than Significant Impact. The RNG plant is underlain primarily by Redding gravelly loam, a soil type characterized by moderate to high linear extensibility but also by good drainage, which reduces the likelihood of substantial expansion-related issues.[53] Although expansive soils can pose risks where new structures or utilities are introduced, the project area has been previously developed and disturbed, meaning that much of the native soil profile has already been compacted, reworked, or otherwise stabilized through past land uses. Further, any project-related development would need to adhere to the existing CBC to ensure the maximum necessary protection available for development. Because the project would occur within an already altered setting and would incorporate standard construction practices that address soil behavior, the potential for adverse effects related to expansive soils would be less than significant.

e. *Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?*

No Impact. The project does not include the installation or use of a septic tank or any alternative wastewater disposal system. All wastewater generated by the project would be managed through existing, permitted wastewater infrastructure associated with the landfill facility. Therefore, no impact would occur.

f. *Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

Less than Significant with Mitigation. Based on the review of geologic mapping and the field survey from the Cultural Resources Technical Report (Appendix F), the potential for discovering paleontological resources within the project site is high. Geologic mapping

[52] U.S. Geologic Survey. Areas of Land Subsidence in California. Accessed March 24, 2026 from https://ca.water.usgs.gov/land_subsidence/california-subsidence-areas.html.

[53] University of California Davis. (2018). Soil Data Explorer Redding Series. Official Series Description. Accessed January 16, 2026 from https://casoilresource.lawr.ucdavis.edu/sde/?series=redding#osd.

indicates that this fill is underlain by nonmarine sedimentary units of Pliocene-Pleistocene age, including loosely consolidated sandstone, shale, and gravel.[54] Pleistocene-age deposits are known to have the potential to contain significant paleontological resources. Construction of the pipeline would employ horizontal directional drilling methods at roadway crossings, commercial/residential areas, and along environmentally sensitive areas, such as streams and other aquatic resources. Implementation of Mitigation Measure GEO-1 would ensure that any potential impacts to paleontological resources are avoided or minimized. Therefore, impacts would be less than significant with mitigation.

Environmental Mitigation Measures

The following mitigation measure would be implemented during construction of the project to reduce potential impacts related to paleontological resources.

GEO-1: Inadvertent Discovery of Paleontological Resources

If paleontological resources are discovered during earthmoving activities, immediately cease work in the vicinity of the find and notify the Sacramento County Department of Planning and Environmental Review. Retain a qualified paleontologist to evaluate the resource and prepare a recovery plan based on Society of Vertebrate Paleontology Guidelines.[55] The recovery plan may include, but is not limited to, a field survey, construction monitoring, sampling and date recovery procedures, museum curation for any specimen recovered, and a report of findings. Recommendations in the recovery plan that are determined by the County to be necessary and feasible will be implemented before construction activities can resume at the site where the paleontological resources were discovered.

IX. Greenhouse Gas Emissions

Would the project:	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Information within this section for the Distribution Connection Route (Option 1) and the Transmission Connection Route (Option 2), as well as RNG plant on-site regulated emissions, is primarily based upon the following technical studies; refer to Appendix A:

- *Kiefer Landfill Gas Utilization Project Air Quality and Greenhouse Gas Study* (Pipeline Emissions Study), prepared by Rincon Consultants, Inc., dated April 2026;

[54] California Department of Conservation. (n.d.). Geologic Map of California. California Geological Survey. Accessed January 12, 2026 from https://maps.conservation.ca.gov/cgs/gmc/.

[55] Society of Vertebrate Paleontology. 2010. Standard procedures for the assessment and mitigation of adverse impacts to paleontological resources. Society of Vertebrate Paleontology, McLean, VA.

- *Potential to Emit (PTE) and Greenhouse Gas (GHG) Information for the Kiefer Landfill Gas (KLG) RNG Project in Support of CEQA Sacramento County, California* (RNG Plant Emissions Study), prepared by NextEra Energy, dated January 22, 2026; and

- *RNG Plant Construction, Mobile, and Off-Road Air Quality Modeling Outputs,* prepared by Michael Baker International, dated April 2026.

Environmental Setting

California is a substantial contributor of global greenhouse gas (GHG) emissions, emitting approximately 371.1 million metric tons of carbon dioxide equivalent ($MMTCO_2e$) in 2022.[56] A carbon dioxide equivalent unit is defined as the number of metric tons of CO_2 emissions with the same global warming potential as one metric ton of another GHG. Methane (CH_4) is also an important GHG that potentially contributes to global climate change. GHGs are global in their effect, which is to increase the earth's ability to absorb heat in the atmosphere. As primary GHGs have a long lifetime in the atmosphere, accumulate over time, and are generally well-mixed, their impact on the atmosphere is mostly independent of the point of emission. Every nation emits GHGs and as a result makes an incremental cumulative contribution to global climate change; therefore, global cooperation will be required to reduce the rate of GHG emissions enough to slow or stop the human-caused increase in average global temperatures and associated changes in climatic conditions.

The impact of human activities on global climate change is apparent in the observational record. Air trapped by ice has been extracted from core samples taken from polar ice sheets to determine the global atmospheric variation of CO_2, CH_4, and nitrous oxide (N_2O) from before the start of industrialization (approximately 1750), to over 650,000 years ago. For that period, it was found that CO_2 concentrations ranged from 180 to 300 parts per million (ppm). For the period from approximately 1750 to the present, global CO_2 concentrations increased from a pre-industrialization period concentration of 280 to 379 ppm in 2005, with the 2005 value far exceeding the upper end of the pre-industrial period range. As of April 2026, the highest monthly average concentration of CO_2 in the atmosphere was recorded at 429.62 ppm.[57]

The Intergovernmental Panel on Climate Change (IPCC) constructed several emission trajectories of GHGs needed to stabilize global temperatures and climate change impacts. It concluded that a stabilization of GHGs at 400 to 450 ppm CO_2 equivalent (CO_2e) concentration[58] is required to keep global mean warming below 2 degrees Celsius (^oC), which in turn is assumed to be necessary to avoid dangerous climate change.

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56 California Air Resources Board. (2024). California Greenhouse Gas Emissions for 2000 to 2022, Trends of Emissions and Other Indicators, September 20, 2024.

57 Scripps Institution of Oceanography. (n.d.). Carbon Dioxide Concentration at Mauna Loa Observatory, Accessed April 17, 2026 from https://scripps.ucsd.edu/programs/keelingcurve/.

58 Carbon Dioxide Equivalent (CO2e) – A metric measure used to compare the emissions from various greenhouse gases based upon their global warming potential.

REGULATORY SETTING

FEDERAL

U.S. ENVIRONMENTAL PROTECTION AGENCY

The USEPA issued a Final Rule for mandatory reporting of GHG emissions in October 2009. This Final Rule applies to fossil fuel suppliers, industrial gas suppliers, direct GHG emitters, and manufacturers of heavy-duty and off-road vehicles and vehicle engines and requires mandatory reporting of emissions.[59] In the years following this rule, USEPA established additional regulatory requirements under the Clean Air Act to ensure that large stationary sources incorporate GHG considerations into federal air permitting programs.

In 2010 and 2011, the USEPA adopted the GHG Tailoring Rule, which established CO_2e thresholds (generally 75,000 to 100,000 tons per year) to phase in Prevention of Significant Deterioration (PSD) and Title V permitting requirements for large GHG-emitting sources. However, in *Utility Air Regulatory Group v. EPA* (2014), the U.S. Supreme Court held that the Clean Air Act does not authorize USEPA to require a source to obtain PSD or Title V permits solely on the basis of its GHG emissions. Instead, PSD and Title V permitting requirements for GHGs apply only to sources that are otherwise subject to permitting due to emissions of other regulated pollutants. For such sources, the Court affirmed that USEPA may require the application of Best Available Control Technology (BACT) to address GHG emissions.[60]

Following the *Utility Air Regulatory Group v. EPA* decision, USEPA and federal courts revised the implementation of GHG permitting requirements to align with this interpretation, including vacating provisions that would have required permitting based solely on GHG emissions and maintaining applicability only for sources already subject to PSD or Title V programs for conventional pollutants. As a result, current federal GHG permitting requirements focus on incorporating GHG controls (through BACT) at large stationary sources that trigger major source permitting for other pollutants, rather than establishing GHG emissions alone as an independent basis for permitting.[61]

STATE

California has adopted a comprehensive suite of statewide legislation addressing climate change and the reduction of GHG emissions, establishing the framework for the State's long-term GHG reduction and climate resilience efforts. Assembly Bill (AB) 32, the Global Warming Solutions Act of 2006, established California's initial statewide GHG reduction target of returning emissions to 1990 levels by 2020, a target the State achieved in 2016.[62] Senate Bill (SB) 375 supports AB 32 by integrating transportation, housing, and land use planning through regional Sustainable Communities Strategies aimed at reducing vehicle-related GHG

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59 U.S. Environmental Protection Agency. (n.d.). Rule for Mandatory Reporting of Greenhouse Gases, Accessed January 21, 2026 from https://www.epa.gov/regulations-emissions-vehicles-and-engines/final-rule-mandatory-reporting-greenhouse-gases

60 U.S. Environmental Protection Agency. (n.d.). Clean Air Act Permitting for Greenhouse Gases, Accessed May 28, 2026 from https://www.epa.gov/nsr/clean-air-act-permitting-greenhouse-gases

61 Ibid.

62 California Air Resources Board. (n.d.). Global Warming Solutions Act of 2006 (AB 32) – 2020 Greenhouse Gas Emissions Limit, Accessed April 17, 2026 from https://ww2.arb.ca.gov/ghg-2020-limit.

emissions.[63] Building on these early efforts, Senate Bill 32 codified a statewide GHG reduction target of 40 percent below 1990 emission levels by 2030.[64] Assembly Bill 1279 (the California Climate Crisis Act) further extends the State's climate policy by establishing a goal of achieving carbon neutrality as soon as possible, but no later than 2045, and achieving and maintaining net-negative GHG emissions thereafter.[65] In addition, Executive Order S-03-05 established California's long-term GHG reduction goals, including an 80-percent reduction below 1990 levels by 2050, providing foundational direction for subsequent climate legislation and planning efforts.[66]

CALIFORNIA'S 2022 CLIMATE CHANGE SCOPING PLAN

In December 2022, the California Air Resources Board (CARB) released the *2022 Scoping Plan for Achieving Carbon Neutrality* (2022 Scoping Plan), which identifies strategies to achieve statewide carbon neutrality by 2045 or earlier in accordance with AB 1279. The plan builds on existing statutory mandates to substantially reduce reliance on fossil fuels, expand clean energy and non-combustion technologies, reduce emissions of short-lived climate pollutants, and incorporate carbon capture, sequestration, and nature-based solutions. Under the 2022 Scoping Plan, California aims to reduce GHG emissions by 85 percent below 1990 levels by 2045 while improving public health, advancing environmental justice, and supporting economic growth.

LOCAL

COUNTY OF SACRAMENTO CLIMATE ACTION PLANNING

The County's Climate Action Plan (CAP), adopted in November 2024, provides a comprehensive framework to reduce GHG emissions while balancing environmental, economic, and community objectives. The CAP includes community-wide and government operations GHG inventories established using a 2015 baseline and incorporates population and emissions forecasting, which projects an emissions rate of approximately 4.95 metric tons of CO_2e per capita by 2039. The CAP identifies strategies and implementing actions to achieve State GHG reduction targets and the County's goal of carbon neutrality by 2045. Projects proposed within unincorporated areas of the County are required to demonstrate consistency with applicable CAP measures and actions to reduce GHG emissions from current and future activities.

THRESHOLDS OF SIGNIFICANCE

GHG Emissions

Evaluation of GHG impacts under CEQA requires the lead agency to determine what constitutes a significant impact. The Governor's Office of Land Use and Climate Innovation (formerly the

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63 California Air Resources Board. (n.d.). Sustainable Communities and Climate Protection Act (SB 375), Accessed April 17, 2026 from https://ww2.arb.ca.gov/our-work/programs/sustainable-communities-climate-protection-program.

64 California Air Resources Board. (n.d.). Senate Bill 32 – Greenhouse Gas Emissions Reduction Target, Accessed April 17, 2026 from https://ww2.arb.ca.gov/our-work/programs/senate-bill-32-sb-32.

65 California Air Resources Board. (n.d.). Assembly Bill 1279 (The California Climate Crisis Act), Accessed April 17, 2026 from https://ww2.arb.ca.gov/2022-assembly-bill-1279-muratsuchi-al-california-climate-crisis-act-chaptered.

66 State of California, Governor's Office. (2005). Executive Order S-03-05, Accessed April 17, 2026 from https://www.ca.gov/archive/gov37/2005/06/01/executive-order-s-3-05/.

Office of Planning and Research [OPR]) guidance does not establish a quantitative threshold of significance for assessing project-level GHG emissions. In addition, CARB has not adopted a numerical threshold or recommended a specific methodology for determining significance for individual development projects.

In April 2020, SMAQMD adopted an update to their land development project operation GHG threshold, which requires a project to demonstrate consistency with CARB's 2017 Climate Change Scoping Plan. SMAQMD developed thresholds for Sacramento County based on determining the County's share of statewide 2030 GHG emissions by sector, versus new development, allocating 2030 GHG emissions from new development among land uses and place types to set numeric thresholds and setting best management practices by land uses and place types that achieve those numeric thresholds. The Sacramento County Board of Supervisors adopted the updated GHG thresholds in December 2020. SMAQMD's technical support document, "Greenhouse Gas Thresholds for Sacramento County," identifies operational measures that should be applied to a project to demonstrate consistency.[67]

For land development and construction projects, the SMAQMD thresholds of significance for GHG, for both construction and operational phases, is 1,100 $MTCO_2e$ (metric tons of carbon dioxide equivalent) per year. For stationary sources, the threshold of significance for the construction phase is 1,100 $MTCO_2e$ per year and for the operational phase, 10,000 $MTCO_2e$ per year. Although the project is not a typical land use development project and would generate stationary source emissions, this analysis conservatively applies SMAQMD's 1,100 $MTCO_2e$ threshold for both construction and operational emissions for Impact Discussion A. For Impact Discussion B, significance is based on the project's consistency with the County CAP and the 2022 Scoping Plan.

Impact Discussion

a. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less Than Significant Impact.

Construction Greenhouse Gas Emissions

Project construction would primarily generate temporary GHG emissions from construction equipment operating on-site, as well as construction worker trips, vendor trips, and material delivery trips. The project proposes construction of the RNG plant and either the Distribution Connection Route (Option 1) or the Transmission Connection Route (Option 2).

Project-generated construction emissions were quantified using the CARB–approved California Emissions Estimator Model (CalEEMod), version 2022.1. Construction emissions were estimated for each construction phase based on the anticipated duration and equipment types provided by the project applicant. Detailed construction assumptions used in the analysis are provided in Appendix A.

Table IS-8 presents the annual construction GHG emissions associated with the RNG plant, the Distribution Connection Route (Option 1), and the Transmission Connection Route

[67] Sacramento Metropolitan Air Quality Management District. (2020). Greenhouse Gas Thresholds for Sacramento County.

(Option 2), as well as the combined scenarios involving the simultaneous construction of the RNG plant and either pipeline connection option.

As shown in **Table IS-8,** project construction GHG emissions would not exceed the SMAQMD annual GHG construction threshold during any construction year. Impacts would be less than significant.

Table IS-8: Construction-Related Greenhouse Gas Emissions

Year	$MTCO_2e$ per Year
RNG Plant[1]	
2027	544
2028	52
Option 1: Distribution Connection Route[2]	
2027	260
2028	318
Option 2: Transmission Connection Route[2]	
2027	436
2028	546
RNG Plant + Option 1: Distribution Connection Route	
2027	804
2028	370
RNG Plant + Option 2: Transmission Connection Route	
2027	980
2028	598
Annual SMAQMD Threshold	*1,100*
Exceed Threshold?	*No*

$MTCO_2e$ = metric tons of carbon dioxide equivalent; RNG = renewable natural gas

[1] Emissions based on CalEEMod outputs.
[2] Emissions based on the Pipeline Emissions Study. Emissions conservatively assume the compressor station would be built under both the Distribution Connection Route (Option 1) and the Transmission Connection Route (Option 2) scenarios.

Source: CalEEMod; Pipeline Emissions Study; refer to Appendix A.

Operational Greenhouse Gas Emissions

Under existing conditions, landfill gas generated at the Kiefer Landfill is collected and combusted on-site at two engine plants, KLG-1 and KLG-2, to generate electricity supplied to the Sacramento Municipal Utility District. KLG-1 consists of three 3-megawatt internal combustion engines and KLG-2 consists of two 3-megawatt engines, which typically operate on a continuous basis except during planned or unplanned outages. During engine outages, or when landfill gas generation exceeds engine capacity, excess landfill gas is routed to two existing enclosed landfill gas flares for combustion. In addition to the engine plants and flares, existing sources of GHG emissions at the landfill include fuel combustion associated with street sweepers and a diesel-fueled standby emergency generator. **Table IS-9** presents GHG emissions generated under existing conditions.

The project proposes an RNG plant at the Kiefer Landfill, with a pipeline connection to existing Pacific Gas and Electric Company (PG&E) natural gas infrastructure via either the Distribution Connection Route (Option 1) or the Transmission Connection Route (Option 2). Operation of the RNG plant would convert landfill gas to RNG for pipeline injection, replacing on-site electricity generation while utilizing existing landfill infrastructure, as needed, for landfill gas management. By converting landfill gas that would otherwise be combusted for electricity generation or flared, the project would reduce CH_4 emissions by destroying CH_4 and displacing fossil-derived natural gas, thereby lowering the overall GHG emissions of landfill operations. Stationary and operational GHG emission sources associated with the RNG plant and continued landfill operations would include up to two converted natural gas engines associated with the existing Kiefer Landfill Gas facility, existing landfill gas flares (Flare No. 1 and/or Flare No. 2), an existing diesel-fueled standby emergency generator, and street sweepers. In addition, the RNG plant would include new off-specification gas process flares (two units), a thermal oxidizer, and a natural gas-fueled emergency generator.

The RNG plant would also generate minimal operational mobile and off-road equipment emissions. Project-related vehicle activity would include wastewater hauling to the EchoWater Resources Recovery Facility, daily employee commute trips, routine delivery truck visits, and periodic service and maintenance trips using pickup trucks, utility trucks, box trucks, and vacuum trucks. In total, the project would generate approximately 14 daily vehicle trips; refer to Appendix A for the detailed vehicle assumptions. Off-road equipment associated with RNG plant operations would include one forklift and one scissor lift. **Table IS-9** summarizes the GHG emissions generated by the RNG plant in combination with either the Distribution Connection Route (Option 1) or the Transmission Connection Route (Option 2).

GHG emissions generated under existing conditions and for the proposed project were primarily modeled with CalEEMod, with the exception of on-site permitted emissions; refer to Appendix A for detailed modeling inputs, assumptions, and emission calculations. As shown in **Table IS-9**, the proposed project would result in a net reduction of 29,406 $MTCO_2e$ when compared to existing conditions. Therefore, project operational GHG emissions would not exceed the SMAQMD threshold and impacts would be less than significant.

Table IS-9: Operational Greenhouse Gas Emissions

Source Category	$MTCO_2e$ per Year
Existing Conditions	
Mobile[1]	1
Area[2]	1,036
Energy[3]	-13,623
Water[4]	-
Waste[4]	-
Refrigerants[5]	0
Total Emissions	*-12,586*
Option 1 or Option 2[7]	
Mobile	133
Area	1
Energy	91
Water	6
Waste	10
Refrigerants	1
Total Emissions	*242*
RNG Plant	
Mobile[1]	27
Area[2]	251
Energy[3]	-42,512
Water[4,6]	-
Waste[4,6]	-
Refrigerants[5]	0
Total Emissions	*-42,233*
Total Net Operational Emissions	***-29,406***
Annual SMAQMD Threshold	*1,100*
Exceeds Threshold?	*No*

$MTCO_2e$ = metric tons of carbon dioxide equivalent; RNG = renewable natural gas

[1] Mobile sources for existing conditions and the RNG plant include street sweepers; refer to RNG Plant Emissions Study. The RNG plant also includes 14 vehicle trips associated with wastewater hauling, employee commuting, deliveries, and periodic service and maintenance. Vehicle trips for existing conditions were conservatively not accounted for.
[2] Area sources for existing conditions include flares, landfill gas internal combustion engines, and an emergency generator; refer to the RNG Plant Emissions Study. Project area sources

include two off-spec flares, a thermal oxidizer, up to natural gas-fired engines, and a natural gas emergency generator (RNG Plant Emissions Study, Scenario 2), as well as one forklift and one scissor lift (modeled in CalEEMod). Scenario 2 is the reasonably foreseeable operating scenario for the RNG plant.

[3] Energy emissions are based on energy generation and consumption values provided by the project Applicant.

[4] RNG plant water and waste consumption would remain similar to existing conditions. Therefore, GHG emissions associated with the RNG plant and existing conditions were not accounted for.

[5] Existing conditions and the proposed RNG plant would not generate refrigerants.

[6] Although the RNG plant would generate slightly more gas condensate than existing conditions, condensate volumes would be minor relative to overall landfill leachate generation and would be managed through the existing wastewater disposal system.

[7] Emissions based on the Pipeline Emissions Study. Emissions conservatively assume the compressor station would be built under both the Distribution Connection Route (Option 1) and the Transmission Connection Route (Option 2) scenarios.

Source: CalEEMod; Pipeline Emissions Study; RNG Plant Emissions Study; refer to Appendix A.

b. Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact. The project would be consistent with the County CAP and the 2022 Scoping Plan. The project supports the County CAP goals related to CH_4 reduction, renewable energy generation, and efficient landfill gas management by converting landfill gas to renewable natural gas for beneficial use. The project also aligns with the 2022 Scoping Plan by reducing reliance on fossil fuels, lowering short-lived climate pollutant emissions, and advancing clean energy infrastructure consistent with California's carbon-neutrality objectives. Therefore, the project would be consistent with the goals of the County CAP as well as the 2022 Scoping Plan and would not conflict with adopted greenhouse gas reduction strategies.

ENVIRONMENTAL MITIGATION MEASURES

None recommended.

X. HAZARDS AND HAZARDOUS MATERIALS

Would the project:	**Potentially Significant**	**Less than Significant with Mitigation**	**Less than Significant**	**No Impact**
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
f. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

ENVIRONMENTAL SETTING

The project site is located within a semi-rural portion of southeast Sacramento County, an area characterized by expansive open lands, low-density development, and limited urban infrastructure. The proposed RNG site is located within the existing Kiefer Landfill which began operating in 2000.[68] Although the broader surroundings remain largely undeveloped, the project site itself has a long history of industrial use, according to public databases EnviroStor maintained by the California Department of Toxic Substances Control (DTSC), GeoTracker maintained by the State Water Resources Control Board (SWRCB), and the USEPA National

[68] Sacramento Environmental Commission. (2017). Kiefer Landfill – A Regional Resource. Accessed January 12, 2026 from https://emd.saccounty.gov/SEC/Documents/Kiefer%20Landfill.pdf.

Priorities List.[69,70,71] Based on these databases, the project site contains no open hazardous cleanup sites or federal superfund sites.

Regulatory Setting

The Hazardous Materials Division of the Sacramento County Environmental Management Department (EMD) has been designated by the California Environmental Protection Agency (CalEPA) as the Certified Unified Program Agency (CUPA) for Sacramento County. As the CUPA, the Environmental Compliance Division administers six statewide environmental programs, including those regulating the underground storage of hazardous substances. Program responsibilities include permitting and inspecting regulated facilities, providing compliance guidance and updates on evolving State and Federal requirements, investigating complaints involving spills or unauthorized releases, and issuing administrative enforcement actions when violations occur. Fuel station operators must obtain permits from the County EMD for the installation, upgrade, repair, or removal of underground storage tanks (USTs). When protective measures fail and release occurs, the CUPA also works in coordination with State and Federal agencies during remediation to ensure appropriate corrective actions are implemented.

In the State of California, Section 65962.5 of the Government Code requires that the California Department of Toxic Substances Control (DTSC), the California Department of Public Health, and the State Water Resources Control Board (SWRCB) compile lists of all hazardous waste facilities subject to corrective action, sites included in the Abandoned Site Assessment Program, drinking water wells that contain detectable levels of organic contaminants, underground storage tanks with unauthorized releases, and solid waste disposal sites, cleanup sites, and the like. Locations of potential toxic substances and contamination in California are identified by the DTSC and the SWRCB. According to the DTSC and SWRCB databases, the project site is not identified as a hazardous materials cleanup site, nor are there any hazardous materials cleanup sites located adjacent to the project site.

Impact Discussion

a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. Construction would involve the temporary use and handling of typical hazardous materials such as fuels and oils for equipment. These activities would be short-term and conducted in compliance with applicable federal, state, and local regulations, minimizing the potential for accidental releases.

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69 Department of Toxic Substances Control. (2026). EnviroStor. Accessed January 12, 2026 from https://www.envirostor.dtsc.ca.gov/public/search?CMD=search&city=&zip=&county=Sacramento&case_number=&business_name=Kiefer&FEDERAL_SUPERFUND=True&STATE_RESPONSE=True&VOLUNTARY_CLEANUP=True&SCHOOL_CLEANUP=True&CORRECTIVE_ACTION=True&tiered_permit=True&evaluation=True&operating=True&post_closure=True&non_operating=True&inspections=True&inspectionsother=True.

70 State Water Resources Control Board. (2026). GeoTracker. Accessed January 12, 2026 from https://geotracker.waterboards.ca.gov/

71 U.S. Environmental Protection Agency. Superfund National Priorities List (NPL) Where You Live Map. Accessed March 10, 2026 from https://experience.arcgis.com/experience/4822dbc3d1c04131a548d4404bb1496a.

Once operational, the RNG plant would treat landfill gas to remove moisture and impurities using carbon-media vessels and other treatment units. Off-gas generated during treatment would be destroyed in a thermal oxidizer, which reduces hazardous constituents through high-temperature combustion, or managed through off-specification gas flares, as needed. The carbon-media system draws landfill gas to the plant using a blower, where it enters a closed-loop process that converts hydrogen sulfide (H_2S) into elemental sulfur. The sulfur is then captured within activated carbon media. As a result, the RNG plant's operational processes would not be a substantial hazard to the public or the environment, and impacts would be less than significant.

b. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant Impact. As noted above, construction of the project would most likely include the use of small amounts of hazardous materials, which would be handled in compliance with all applicable regulations. During operation, the RNG plant's treatment systems including the carbon media system, thermal oxidizer, and off-specification gas flares, would be designed to safely contain and manage all byproducts. Maintenance of the carbon media system would include an annual replacement of the media used for sulfur treatment. These controls minimize the potential for releases even under reasonably foreseeable upset or accident conditions. Therefore, with adherence to all federal, state, and local regulations, implementation of the project would not create a significant hazard to the public or the environment and impacts would be less than significant.

c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No Impact. There are no schools located near the RNG plant site, and although the proposed pipeline alignment passes in the vicinity of two schools, both are located more than 0.25 miles away. Sunrise Elementary School is located approximately 0.28 miles east of the Option 2 pipeline alignment, and Robert J. McGarvey Elementary School is located approximately 0.53 miles east of the Option 2 pipeline alignment. There are no schools located within 0.25 miles of the compressor and M&R station sites. The closest school to both the alternative and compressor station sites is Sunrise Elementary School, located 0.5 miles from the base-case compressor station location and approximately 0.3 miles from the alternative compressor station site. At this distance, construction and operation of the pipeline would not affect existing or proposed school facilities. Therefore, no impact would occur.

d. Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

No Impact. As previously noted, according to the DTSC and SWRCB databases, the project site is not identified as a hazardous materials cleanup site, nor are there any hazardous materials cleanup sites located adjacent to the project site. Thus, project site is not identified as a site on a list of hazardous materials sites pursuant to Government Code Section 65962.5; therefore, no impact would occur.

e. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. During construction of the project, temporary lane closures may be required to allow for construction equipment movement and for the pipeline to be placed. However, roadways would remain open and passible during construction, and any disruptions would be short-term and would not physically interfere with any emergency evacuation plans. Additionally, all applicable building codes, including fire codes, and ordinances would be required for construction; therefore, impacts would be less than significant.

f. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Less Than Significant Impact. The RNG plant, pipeline alignments, and compressor/M&R sites are located within State and Local Responsibility Areas and within a designated Moderate Fire Hazard Severity Zone (FHSZ).[72,73] Although the project area is subject to elevated wildfire risk, fire protection services would continue to be provided by the California Department of Forestry and Fire Protection (CAL FIRE) and the Sacramento Metropolitan Fire District (SMFD). For a more detailed evaluation of site-specific wildfire hazards, refer to Section XXI. Wildfire. Based on that analysis and compliance with applicable fire safety requirements, the project would not expose people or structures to a significant wildfire-related risks, and impacts would be less than significant.

Environmental Mitigation Measures

None recommended.

XI. Hydrology and Water Quality

Would the project:	**Potentially Significant**	**Less than Significant with Mitigation**	**Less than Significant**	**No Impact**
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐

[72] Cal Fire. (2025). State Responsibility Area. Accessed January 21, 2026 from https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=468717e399fa4238ad86861638765ce1.

[73] Cal Fire. (2025). Fire hazard Severity Zone (FHSZ). Accessed January 21, 2026 from https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones.

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. result in a substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☒	☐
iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv. impede or redirect flood flows?	☐	☐	☐	☒
d. Develop in an area that is subject to 200-year urban levels of flood protection (ULOP)?	☐	☐	☐	☒
e. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
f. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

ENVIRONMENTAL SETTING

SURFACE WATER

The RNG plant and pipeline alignment options are near multiple bodies of surface water including the Blodgett Reservoir, Folsom South Canal, Morrison Creek, Mather Lake, and Laguna Creek with the proposed pipeline running through Laguna Creek. When construction occurs at the creek crossing, HDD methods would be used, with entry and exit points set at least 150 feet from aquatic resources.

GROUNDWATER

The RNG plant, pipeline alignment options, and compressor/M&R station sites lie within the Sacramento Valley Groundwater Basin, near its eastern boundary where alluvial deposits thin and groundwater exchange with the Sierra Nevada is minimal. The project site is specifically located in the South American Subbasin (SASb), managed by the Sloughhouse Resource Conservation District (SRCD) Groundwater Sustainability Agency.[74,75] The SASb serves as a source of drinking water for urban and rural communities and supports a wide range of uses,

[74] Sustainable Groundwater Management Act. (n.d.). Basin Prioritization Dashboard. Accessed January 12, 2026 from https://gis.water.ca.gov/app/bp-dashboard/final/.

[75] California Department of Water Resources. (2023). Approved Determination of 2022 Groundwater Sustainability Plan. Figure 1: South American Subbasin Location Map. Accessed January 12, 2026 from https://img1.wsimg.com/blobby/go/9e3a96e6-e48d-4e0c-bd1b-21b92d1230f7/downloads/SouthAmerican_GSP2023_Determination.pdf?ver=1766004968735.

including irrigation, agriculture, domestic and industrial supply, municipal demand, and the protection of fish and wildlife.[76] The subbasin is designated as high priority under the Sustainable Groundwater Management Act (SGMA), and a Groundwater Sustainability Plan (GSP) has been developed to guide long-term sustainable groundwater use and protect beneficial users. The SRCD, established in 1956, carries out regional resource-management responsibilities such as runoff control, erosion prevention, and water-resource development, all of which support groundwater sustainability efforts in the subbasin.[77]

Regulatory Setting

Federal

Clean Water Act

The federal Clean Water Act (CWA), administered by the USEPA, was enacted to restore and maintain the chemical, physical, and biological integrity of the nation's waters. The Act requires states to develop water-quality plans and policies, establishes water-quality standards for surface waters, and created the National Pollutant Discharge Elimination System (NPDES) program under Section 402, including Section 402(p), which governs stormwater permitting. The CWA also authorizes USEPA to implement pollution-control programs, such as setting wastewater standards for industrial dischargers. In California, responsibility for implementing and enforcing the CWA rests with the State Water Resources Control Board and the nine Regional Water Quality Control Boards, which oversee compliance at the state and regional levels.

State

Sustainable Groundwater Management Act (SGMA)

SGMA establishes the statewide framework for achieving long-term groundwater sustainability in California. SGMA directs the Department of Water Resources (DWR) to develop best management practices and technical guidance to support local Groundwater Sustainability Agencies in managing their subbasins. The project site is located within the jurisdiction of the Sloughhouse Resource Conservation District Groundwater Sustainability Agency, which is responsible for implementing SGMA requirements and overseeing sustainable groundwater management in the area.

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act (Water Code Section 13000 et seq.) is the primary water quality control law in California. The Porter-Cologne Act established the SWRCB and divided the State into nine (9) regional basins, each overseen by a RWQCB. The nine (9)

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[76] South American Subbasin Groundwater Sustainability Plan. (2021). Final report. Accessed January 12, 2026 from https://img1.wsimg.com/blobby/go/9e3a96e6-e48d-4e0c-bd1b-21b92d1230f7/downloads/SASbGSP_FrontEnd-ExecSumm_FINAL_10292021.pdf?ver=1766004968765.

[77] South American Subbasin Groundwater Sustainability Plan. (2021). Final report. Accessed January 12, 2026 from https://img1.wsimg.com/blobby/go/9e3a96e6-e48d-4e0c-bd1b-21b92d1230f7/downloads/SASbGSP_FrontEnd-ExecSumm_FINAL_10292021.pdf?ver=1766004968765.

RWQCBs have the primary responsibility for the coordination and control of water quality within their respective jurisdictional boundaries. The Porter-Cologne Act requires the RWQCBs to establish water quality objectives while acknowledging that water quality may be changed to some degree without unreasonably affecting beneficial uses. Water quality objectives are limits or levels of water quality constituents or characteristics established for the purpose of protecting beneficial uses. Designated beneficial uses, together with the corresponding water quality objectives, also constitute water quality standards under the federal Clean Water Act. Therefore, the water quality objectives form the regulatory references for meeting State and federal requirements for water quality control. Designated beneficial uses for water bodies on the project site are described in the local regulatory section (under Water Quality Control Plan [Basin Plan]).

LOCAL

SACRAMENTO COUNTY WATER QUALITY: EROSION AND GRADING

Sacramento County operates under an NPDES Municipal Stormwater Permit issued by the RWQCB, which requires reducing pollutants in stormwater to the maximum extent practicable and prohibiting unauthorized non-stormwater discharges. To comply, the County enforces local ordinances that limit sediment and pollutant runoff from new development. The Stormwater Ordinance (SCC 15.12) prohibits unauthorized non-stormwater discharges into the storm drain system and applies to all public and private projects. In addition, SCC 16.44 (Land Grading and Erosion Control) requires projects disturbing one acre or more, or moving 350 cubic yards of soil, to obtain a grading permit and prepare an Erosion and Sediment Control Plan outlining BMPs to prevent sediment from leaving the site. Projects not subject to SCC 16.44 remain regulated under the Stormwater Ordinance.

SGMA SOUTH AMERICAN SUB BASIN GROUNDWATER SUSTAINABILITY PLAN

The SGMA SASb GSP provides the regulatory framework for achieving sustainable groundwater management in the subbasin. The GSP establishes minimum thresholds, measurable objectives, and monitoring requirements to prevent groundwater overdraft, land subsidence, degraded water quality, and depletion of interconnected surface waters. It also outlines management actions and adaptive strategies to protect agricultural, municipal, domestic, and environmental groundwater uses. Projects within the SASb must demonstrate consistency with the GSP by avoiding activities that would interfere with the subbasin's ability to meet long-term sustainability goals.

IMPACT DISCUSSION

a. *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*

   Less Than Significant Impact. Though the RNG Plant is located on previously disturbed land, the construction of the plant, RNG pipeline, and compressor/M&R station sites would disturb soil and increase the potential for soil erosion and discharge of sediment which could affect local surface water. Construction of the project is required to comply with Sacramento County's standards for stormwater quality. Additionally, since the project would disturb more than one acre of soil, the project is subject to the requirements of the State Water Board's NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit), including the preparation of a SWPPP

which specifies BMPs to be utilized during construction to avoid or minimize discharge of any sediments or construction related pollutants.[78] Prior to issuance of a grading permit, the project applicant would be required to provide a copy of the Waste Discharge Identification Number (WDID) to the County to demonstrate proof of coverage under the Construction General Permit.[79]

Additionally, the project is required to comply with the County's Stormwater Ordinance (Section 15.12), which requires implementation of BMPs, including low impact development (LID) strategies, to the maximum extent practicable to prevent or minimize non-stormwater or pollutant discharge into County waterways.[80] Therefore, with the implementation of the above, the project would not violate any water quality standards or waste discharge requirements, nor would it substantially degrade surface or ground water quality. Therefore, impacts would be less than significant.

b. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less Than Significant Impact. As described above, the project site is located within the SASb, which covers approximately 388 square miles and is managed under an adopted GSP. Although the RNG pipeline alignment would pass beneath several surface water bodies through horizontal direction drilling (HDD), including the Blodgett Reservoir, Folsom South Canal, Morrison Creek, Mather Lake, and Laguna Creek, both installation and operation of the pipeline would occur entirely outside of identified potential groundwater recharge locations. [81] According to the SASb GSP, the RNG plant, pipeline alignment options, compressor/M&R station sites are located within an area of “poor groundwater-recharge potential.” The nearest zone with “good groundwater-recharge potential” is located south of the Cosumnes River, approximately one mile south of the proposed RNG plant, indicating that the project area lies outside the region’s primary recharge zone.

Kiefer Landfill contains 16 existing monitoring wells that track groundwater quality parameters such as nitrogen and total dissolved solids (TDS).[82] The project would not modify or interfere with these wells, nor would it extract groundwater or introduce new demands on groundwater supplies. Because the project does not involve groundwater pumping, does not alter recharge features, and does not conflict with groundwater management activities, it would not impede sustainable groundwater management of the basin. Therefore, impacts would be less than significant.

c. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

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78 California State Water Resources Control Board. (n.d.). Construction Stormwater Program. Accessed January 26, 2026 from https://www.waterboards.ca.gov/water_issues/programs/stormwater/construction.html.

79 California Water Board. (n.d.). State Water Resources Control Board. Storm Water Program. Accessed January 26, 2026 from https://www.waterboards.ca.gov/water_issues/programs/stormwater/constfaq.shtml.

80 Sacramento County. (2026). Stormwater Compliance Program Details. Accessed January 26, 2026 from https://emd.saccounty.gov/EH/Pages/Stormwater_Details.aspx.

81 South American Subbasin. (2025). Groundwater Sustainability Plan.

82 Ibid.

i. result in a substantial erosion or siltation on- or off-site;

Less Than Significant Impact. During construction there is the potential for erosion from ground-disturbing activities. However, as previously discussed, compliance with the SWRCB Construction General Permit would be required, which would reduce the potential for erosion or siltation through implementation of a SWPPP with BMPs. With compliance with such requirements, construction impacts related to erosion and siltation would be less than significant.

Following construction, the project site would have more impervious surfaces at the RNG plant and compressor station. However, the project would comply with the County's Stormwater Ordinance (Section 15.12), which requires implementation of BMPs, including low impact development (LID) strategies, to the maximum extent practicable to prevent or minimize erosion and siltation. Additionally, the RNG plant's treatment systems would be designed to safely contain and manage all byproducts, and maintenance of the carbon media system would occur annually. As such, the RNG plant's operational processes would not result in substantial erosion or siltation, and impacts would be less than significant.

ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;

Less Than Significant Impact*.* Construction activities would create the potential for erosion and sediment transport due to ground-disturbing work. However, as noted previously, the project is required to comply with the SWRCB Construction General Permit, including implementation of appropriate BMPs to control flooding. Further, operations and maintenance of the RNG plant would not substantially alter site drainage conditions or increase runoff in a manner that would contribute to flooding. Additionally, the project would not alter the course of a stream or river and would not otherwise alter the existing drainage pattern of the site or area. Therefore, impacts related to flooding would be less than significant.

iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

Less Than Significant Impact. Due to ground-disturbing work, construction activities would create the potential for runoff. However, the project would be required to comply with the SWRCB Construction General Permit, including implementation of appropriate BMPs to control runoff. During operation, the RNG plant would not generate substantial additional runoff or pollutants that would exceed the capacity of existing or planned stormwater drainage systems, as site drainage condition would remain largely unchanged and operation activities would be contained within designed systems. Therefore, the project would not generate runoff that exceeds the capacity of existing stormwater systems, and drainage patterns would remain largely unchanged as compliance with the Construction General Permit and required BMPs would prevent substantial polluted runoff. Therefore, impacts would be less than significant.

iv. impede or redirect flood flows?

No Impact. According to the Federal Emergency Management Agency's National Flood Hazard Layer, the RNG site, pipeline alignment options, compressor and M&R sites are located within Zone X, an area of minimal flood hazard.[83] Therefore, there are no impacts related to flood flows.

d. Would the project develop in an area that is subject to 200-year urban levels of flood protection (ULOP)?

No Impact. The project site is not located in an area subject to the 200-year urban level of flood protection.[84] Therefore, no impact would occur.

e. Would the project in flood hazard, tsunami, or seiche zones risk release of pollutants due to project inundation?

No Impact. The project site is not located in a flood hazard, tsunami, or seiche zone.[85,86] Therefore, there would be no impact related to the risk of release of pollutants due to inundation in a flood hazard, tsunami, or seiche zone.

f. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

No Impact. Construction of the proposed project would include compliance with all regulatory requirements including the development of a site-specific SWPPP, adherence to the SWRCB Construction General Permit requirements, and following the conditions in the County's Stormwater Ordinance. During operation, the RNG plant would continue to comply with applicable water quality regulations through implementation of BMPs and proper containment and management of materials, ensuring that pollutants are not discharged to surface or ground water. Additionally, although the project would result in a marginal increase in impervious surface area, construction and operation of the project would not measurably decrease groundwater supply or inhibit groundwater recharge, as there are no identified groundwater recharge locations within the project area. Therefore, implementation of the project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Therefore, no impact would occur.

Environmental Mitigation Measures

None recommended.

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83 Federal Emergency Management Agency. (2018). Flood Map Service Center. Accessed January 26, 2026 from https://msc.fema.gov/portal/search?AddressQuery=12701%20Kiefer%20Blvd%2C%20Sloughhouse%2C%20CA%2095683.

84 California Department of Water Resources. Best Available Map. Accessed March 24, 2026 from https://gis.bam.water.ca.gov/bam/.

85 Federal Emergency Management Agency. (2018). Flood Map Service Center. Accessed January 26, 2026 from https://msc.fema.gov/portal/search?AddressQuery=12701%20Kiefer%20Blvd%2C%20Sloughhouse%2C%20CA%2095683.

86 Sacramento County (2022). General Plan Safety Element.

XII. LAND USE AND PLANNING

Would the project:	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
a. Physically divide an established community?	☐	☐	☐	☒
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

ENVIRONMENTAL SETTING

The project site is located within Sloughouse, an unincorporated community within Sacramento County. The project site has land use designation and zoning for public & quasi-public uses and agricultural uses, respectively. The surrounding area is rural. The RNG pipeline would partially run through the City of Rancho Cordova where the M&R and compressor sites would be located.

REGULATORY SETTING

LOCAL

SACRAMENTO COUNTY GENERAL PLAN LAND USE ELEMENT

The Sacramento General Plan consists of 16 elements that outline the long-range vision for development within the County. The Land Use Element of the General Plan establishes the foundation for future land use and development throughout the County and establishes the land use classification system and policies. Within the Land Use Element, the designation of the RNG site is public & quasi-public with surrounding designations of general agriculture.[87] The public and quasi-public designation establishes areas used for education, waste disposal and cemeteries. These areas are of significant size, under County jurisdiction, regional in scope, specified by State law, or have significant land use impacts.[88]

SACRAMENTO COUNTY ZONING CODE

In addition to the General Plan, the County's Zoning Code establishes land use zones with standards and regulations for development within those zones. Chapter 2 of the Zoning Code, Zoning Districts, divides unincorporated areas into various zoning districts, each with development standards and use regulations. These districts are categorized into agricultural, agricultural-residential, residential, and combining zoning districts. The Agricultural zoning districts promote long-term agricultural use, discouraging premature or unnecessary conversion of agricultural land.

87 Sacramento County General Plan. (2011). Land Use Diagram.
88 Ibid.

The RNG Plant and surrounding zoning are both designated as AG-80, which is an Agricultural Zoning District.[89] This zoning designation permits one single-family residence per parcel, all agricultural uses, accessory dwellings, and most institutional uses allowed with a Use Permit.[90]

CITY OF RANCHO CORDOVA GENERAL PLAN

A Portion of the RNG Pipeline and proposed compressor and M&R sites are located within the City of Ranch Cordova. The RNG pipeline passes through areas with a Land Use Designation of Low Density Residential, Parks and Open Space, Natural Resources, and Commercial Mixed Use.[91] Additionally, the compressor and M&R sites would be located on private property and have a land use designation of Commercial Mixed Use. According to the City Zoning Map, zoning along the pipeline corridor includes Residential 5 (RD-5), Residential 4 (RD-4), General Commercial (GC), Community Service (CS), and Parks and Open Space (POS). The compressor/M&R sites are designated General Commercial (GC).[92]

IMPACT DISCUSSION

a. *Would the project physically divide an established community?*

   No Impact. The RNG plant is located within the developed interior portion of Kiefer Landfill in a rural area surrounded by open space and agricultural uses. Although portions of the proposed RNG pipeline corridor pass through areas zoned for residential and commercial use, the alignment follows existing roadways and the pipeline would be below ground upon completion of construction and, thus, would not physically divide or alter the structure of the existing community. The RNG plant would be constructed entirely within the existing landfill footprint, so no new community separation or land use disruption would occur. Additionally, the proposed compressor (Option 1) of M&R site (Option 2) would be located within previously developed land or on an undeveloped parcel. Both are designated as Commercial Mixed Use and would not physically divide or alter the structure of the existing community. Therefore, no impact would occur.

b. *Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?*

   No Impact. The project would not conflict with any applicable land use plan, policy, or regulation adopted to avoid or mitigate environmental effects. The RNG plant would be constructed entirely within the existing Kiefer Landfill footprint, consistent with the site's AG-80 zoning and relevant Sacramento County General Plan policies such as AG-2 and AG-9, which support continued agricultural operations and the use of buffers to reduce

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89 Sacramento County. Sacramento County Interactive General Map. Accessed May 28, 2026 from https://planning.saccounty.gov/us/en/planning-environmental-review/resources/library/maps.html#gsc.tab=0.

90 Sacramento County. (2024). Chapter 2: Zoning Districts. Accessed May 28, 2026 from https://landuse.saccounty.gov/szc/ch2/.

91 City of Rancho Cordova. (2006). Land Use Policy Map. Accessed March 25, 2026 from https://www.cityofranchocordova.org/home/showpublisheddocument/715/635895080495700000

92 City of Rancho Cordova. (n.d.). Zoning Viewer. ArcGIS. Accessed March 31, 2026 from https://ranchocordova.maps.arcgis.com/apps/webappviewer/index.html?id=f08b409f526741b0a5571e1fa90a6842

land-use conflicts. The RNG pipeline follows existing roadway corridors and would not introduce any new land use incompatibilities or facilitate land conversion. Additionally, the compressor and M&R sites would not introduce any new land use incompatibilities. Because the project is consistent with all governing land use designations and policies, impacts would not occur.

Environmental Mitigation Measures

None recommended.

XIII. Mineral Resources

Would the project:	**Potentially Significant**	**Less than Significant with Mitigation**	**Less than Significant**	**No Impact**
a. Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?	☐	☐	☐	☒
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

Environmental Setting

Mineral resources within Sacramento County include natural gas, petroleum, sand, gravel, silver, gold, peat, topsoil, and lignite. The primary resources in production are aggregate (sand and gravel) and natural gas. Areas where natural gas is produced are in the Delta's Rio Vista Field. All sand and gravel mined in the County are used for construction, specifically for foundations and as road base material. Most aggregate deposits within the County are located within the Old American River channel, located south of Rancho Cordova. [93]

KLG RNG Plant

The RNG plant and the Option 1 M&R station would be located within an area classified by the California Geologic Survey as a Mineral Resource Zone (MRZ)-4[94], an area where available information is inadequate for assignment to any other MRZ category.[95] The RNG plant site is also near the boundary of an MRZ-1 zone, where adequate geologic information indicates that

[93] Sacramento County. (2017). General Plan Conservation Element.

[94] California Geological Survey, Mineral Land Classification Map of Concrete Aggregate in the Greater Sacramento Area Production-Consumption Region, 2018, accessed January 14, 2026, from https://www.conservation.ca.gov/cgs/Documents/Publications/Special-Reports/SR_245-MLC-SacramentoPCR-2018-Plate01-a11y.pdf.

[95] California Department of Conservation, Special Report 245 - Mineral Land Use Classification: Concrete Aggregate in the Greater Sacramento Area Production - Consumption Region, 2018, accessed January 14, 2026, from https://www.conservation.ca.gov/cgs/Documents/Publications/Special-Reports/SR_245-MLC-SacramentoPCR-2018-Report-a11y.pdf.

no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.[96]

RNG PIPELINE

Most segments of the Option 1 and Option 2 pipeline alignments lie within MRZ-4 zones. The alternate compressor station site and associated pipeline segments for both options would also be located in MRZ-4. Both pipeline options briefly cross MRZ-3 areas near the Blodgett Reservoir, and Option 2 crosses another brief MRZ-3 zone along Kiefer Boulevard (west of Blodgett Reservoir) and Douglas Road (west of Sunrise Boulevard). Additionally, the base-case location for the Option 1 compressor station/Option 2 M&R station would be located near the border of an MRZ-3 zone. MRZ-3 zones are areas containing mineral occurrences of undetermined mineral resource significance,[97] but no designated mineral recovery sites occur within these segments.

Neither the RNG plant site nor the proposed options for the pipeline alignment and their respective compressor/M&R station are located within a State Aggregate Resource Area, nor are they identified in the Sacramento County General Plan as important mineral resource recovery sites.

REGULATORY SETTING

The Surface Mining and Reclamation Act (SMARA), Public Resources Code Section 2710-2796, provides comprehensive surface mining and reclamation policy with the regulation of surface mining operations to minimize adverse environmental impacts and ensure that mined lands are reclaimed to usable condition. As part of SMARA, lands are classified based on their mineral resource potential to prevent irreversible land-use decisions from hindering the operation of resource extraction. Furthermore, SMARA requires the issuance of a permit for mining operations within California, with local jurisdictions designated as the lead agency responsible for enforcing SMARA, review and approval of permit applications, and review and approval of reclamation plans.

IMPACT DISCUSSION

a. Would the project result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?

No Impact. The RNG plant, pipeline alignments, and compressor/M&R locations would not be situated within a State Aggregate Resource Area. Therefore, because the project would not occur within or restrict access to any known state-significant mineral resource deposits, implementation of the project would not result in the loss of availability of a mineral resource of regional or statewide value. Therefore, no impacts would occur.

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96 Ibid.

97 California Department of Conservation, Special Report 245 - Mineral Land Use Classification: Concrete Aggregate in the Greater Sacramento Area Production - Consumption Region, 2018, accessed January 14, 2026, from https://www.conservation.ca.gov/cgs/Documents/Publications/Special-Reports/SR_245-MLC-SacramentoPCR-2018-Report-a11y.pdf.

b. Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. The Sacramento County General Plan does not identify the RNG plant site, any of the proposed pipeline alignment options, or compressor/M&R station locations as locally important mineral resource recovery sites. Although small portions of the pipeline corridor would cross MRZ-3 zones, these areas are not designated mineral extraction sites and do not contain known mineral resources planned for future recovery. Because no locally-important mineral resource recovery areas occur within the project footprint, the project would not result in the loss of availability of locally important mineral resources. Therefore, no impacts would occur.

Environmental Mitigation Measures

None recommended.

XIV. Noise

Would the project:	**Potentially Significant**	**Less than Significant with Mitigation**	**Less than Significant**	**No Impact**
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐

Environmental Setting

Potential noise impacts associated with the proposed project were determined from the results presented in the Noise Study prepared for the proposed project, which is included as Appendix G to this IS/MND.

Noise Background

Noise is defined as unwanted sound. Sound is defined as any pressure variation in air that the human ear can detect. Sound levels are measured using the decibel (dB) scale, which uses the hearing threshold as a point of reference, defined as 0 dB. There is a strong correlation between the way humans perceive sound and A-weighted sound levels. For this reason, the A-weighted sound level, A-weighted decibels (dBA), has become the standard tool of environmental noise assessment for community exposures.

Community noise is commonly described in terms of the “ambient” noise level, which is defined as the all-encompassing noise level associated with a given noise environment. A common statistical tool to measure the ambient noise level is the average, or equivalent, sound level (Leq), over a given period of time (usually one hour). The Leq is the foundation of the composite

noise descriptors, day night average level (Ldn), and the community noise equivalent level (CNEL).

Ldn is based upon the average noise level over a 24-hour day, with a +10 dB weighting applied to noise occurring during nighttime (10:00 p.m. to 7:00 a.m.) hours. The nighttime penalty is based upon the assumption that people react to nighttime noise exposures as though they were twice as loud as daytime exposures. Because Ldn represents a 24-hour average, it tends to disguise short-term variations in the noise environment. Where short-term noise sources are an issue, noise impacts may be assessed in terms of maximum noise levels, hourly averages, or other statistical descriptors.

The perceived loudness of sounds and corresponding reactions to noise are dependent upon many factors, including sound pressure level, duration of intrusive sound, frequency of occurrence, time of occurrence, and frequency content. However, within the usual range of environmental noise levels, perception of loudness is relatively predictable, and can be approximated by weighing the frequency response of a sound level meter by means of the standardized A-weighing network. It is generally recognized that an increase of at least 3 dB of similar sources is usually required before most people perceive a change in noise levels in the community, and an increase of 5 dB is required before the change will be clearly noticeable. A common practice is to assume that a minimally perceptible increase of 5 dB represents a significant increase in ambient noise levels.

NOISE-SENSITIVE RECEPTORS

The proposed RNG Plant would be located within the interior of Kiefer Landfill on previously disturbed land. Noise evaluation for construction and operation of the RNG Plant itself was not required per Sacramento County due to its location within an active landfill and the absence of noise-sensitive receptors within approximately one mile. Accordingly, the Noise Study did not evaluate noise impacts associated with the landfill-based RNG Plant.

Noise-sensitive receptors near the pipeline alignment include single-family residences within the Tricon Sunridge residential community along Fiorenza Lane (located as close as approximately 20 feet northeast of the alignment) and Andria Lane (approximately 70 feet northeast), single-family residences along Kiefer Boulevard (approximately 115 feet north), Sunrise Boulevard (approximately 125 feet east), and Aristotle Circle (approximately 150 feet east), as well as the Heron Landing Community Park located approximately 180 feet east of the alignment.

GROUNDBORNE VIBRATION BACKGROUND

Vibration is usually associated with transmission through the ground or structures, and involves a source, a transmission path, and a receiver. Vibration can be described in terms of acceleration, velocity, or displacement. A common practice is to monitor vibration measurements in terms of velocity in inches per second or root-mean-square (RMS) in vibration decibels (VdB). Standards pertaining to perception as well as damage to structures have been developed for vibration in terms of peak particle velocity as well as RMS velocities.

Differences in subsurface geologic conditions and distance from the source of vibration will result in different vibration levels characterized by different frequencies and intensities. In all cases, vibration amplitudes will decrease with increasing distance. The maximum rate, or velocity of particle movement, is the commonly accepted descriptor of the vibration “strength”.

Human response to vibration is difficult to quantify. Vibration can be felt or heard well below the levels that produce any damage to structures. The duration of the event has an effect on human response, as does frequency. Generally, as the duration and vibration frequency increases, the potential for adverse human response increases. For sources of vibration which are known to be of relatively short duration, such as construction projects, people tend to be more accepting of exposure to relatively brief periods of perceptible vibration, particularly when the vibration generation occurs during daytime hours. Thus, because the proposed project is considered a short-term construction project, the focus of the vibration impact analysis is on the prevention of damage to structures.

During construction, the use of heavy-duty equipment would temporarily generate vibration at nearby sensitive receptors. The greatest vibratory source would be from large offroad equipment (e.g., dozer, excavator, grader, tractor, etc.) during earthmoving activities. **Table IS-10** shows typical vibration levels for various pieces of construction equipment used in the assessment of construction vibration.

Table IS-10: Typical Vibration Levels Measured by Various Construction Equipment

Equiptment	Reference Vibration Level at 25 feet (in/sec PPV)
Large[1] Earthmoving Equipment (e.g., Dozer, Excavator, Grader, Tractor, etc.)	0.089

PPV = peak particle velocity, in/sec = inches per second
[1] "Large" in this context refers to equipment rated at 100 horsepower or greater.
Source: Federal Transit Administration. (2018). Transit Noise and Vibration Impact Assessment Manual.

The reference vibration levels shown in **Table IS-10** were used to calculate expected vibration impacts upon nearby structures based on the closest distances these equipment types may operate to nearby structures.

Regulatory Setting

Federal

Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment Manual

Sacramento County and the City of Rancho Cordova do not establish quantitative construction noise and vibration limits; therefore, the limits recommended by the FTA in the *Transit Noise and Vibration Impact Assessment Manual* were used. This document provides criteria for assessing construction noise impacts based on the potential for adverse community reaction based on the type of affected land use. These construction noise limits are shown in **Table IS-11**.

Table IS-11: FTA Construction Noise Criteria

Land Use	L_{eq}, equip (8-hour), dBA	
	Day (7:00 a.m. to 10:00 p.m.)	Night (10:00 p.m. to 7:00 a.m.)
Residential	80	70
Commercial	85	85
Industrial	90	90

dBA = A-weighted decibels; L_{eq} = equivalent noise level
Source: Federal Transit Administration. (2018). Transit Noise and Vibration Impact Assessment Manual.

The *Transit Noise and Vibration Impact Assessment Manual* also includes criteria for assessing vibration impacts during construction, which are shown in **Table IS-12.** The thresholds shown in **Table IS-12** represent the limits at which minor architectural damage (i.e., non-structural) may occur to these structures.

Table IS-12: FTA Vibration Damage Criteria

Building Category	PPV (in/sec)
I. Reinforced concrete, steel, or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Nonengineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12

PPV = peak particle velocity; in/sec = inches per second
Source: Federal Transit Administration. (2018). Transit Noise and Vibration Impact Assessment Manual.

OCCUPATIONAL HEALTH AND SAFETY ADMINISTRATION

The federal government regulates occupational noise exposure common in the workplace through the Occupational Health and Safety Administration (OSHA) under the USEPA. Noise limitations would apply to the operation of construction equipment and could also apply to any proposed industrial land uses. Noise exposure of this type is dependent on work conditions and is addressed through a facility's Health and Safety Plan, as required under OSHA, and is not addressed further in this analysis.

STATE

CALIFORNIA GENERAL PLAN GUIDELINES

State law requires general plans to include a Noise Element under Government Code Section 65302(f). The California General Plan Guidelines, published by the Governor's Office of Land Use and Climate Innovation (formerly the Office Planning and Research), indicate acceptable, specific land use types in areas with specific noise exposure. The guidelines also offer adjustment factors that may be used to arrive at noise acceptability standards that reflect the noise control goals of the community, the community's sensitivity to noise, and the community's assessment of the relative importance of noise pollution. These guidelines are advisory, and local jurisdictions have the authority to set specific noise standards based on local conditions.

LOCAL

SACRAMENTO COUNTY GENERAL PLAN NOISE ELEMENT

The Noise Element of the Sacramento County General Plan contains policies to control and abate environmental noise and protect the County's citizens from excessive noise exposure.[98] Goals and policies of the Noise Element applicable to the proposed project are as follows:

- **Goal 1:** To protect the existing and future citizens of Sacramento County from the harmful effects of exposure to excessive noise. More specifically, to protect existing noise-sensitive land uses from new uses that would generate noise levels which are incompatible with those uses, and to discourage new noise-sensitive land uses from being developed near sources of high noise levels.

- **Policy NO-8:** Noise associated with construction activities shall adhere to the County Code requirements. Specifically, Section 6.68.090(e) addresses construction noise within the County.

SACRAMENTO COUNTY CODE

Chapter 6.68 of the Sacramento County Code contains regulations for noise generated within the County. Section 6.68.090(e) of the Sacramento County Code specifies that "[n]oise sources associated with construction, repair, remodeling, demolition, paving or grading of any real property" are exempt from the County's noise regulations provided that these "activities do not take place between the hours of eight p.m. and six a.m. on weekdays and Friday commencing at eight p.m. through and including seven a.m. on Saturday; Saturdays commencing at eight p.m. through and including seven a.m. on the next following Sunday and on each Sunday after the hour of eight p.m."

CITY OF RANCHO CORDOVA GENERAL PLAN NOISE ELEMENT

The City of Rancho Cordova General Plan Noise Element contains goals, policies, and actions to protect the City's residents and visitors from the intrusion of harmful levels of noise.[99] The following goals, policies, and actions are relevant to the proposed project:

- **Policy N.1.3:** Ensure that proposed non-residential land uses likely to exceed the City's standards do not create noise disturbances in existing noise-sensitive areas.

- **Policy N.1.4:** Mitigate noise created by proposed non-transportation noise sources to comply with the City's noise standards to the maximum extent feasible.

    - **Action N.1.4.1:** Limit construction activity to the hours of 7:00 a.m. to 7:00 p.m. weekdays and 8:00 a.m. to 6:00 p.m. weekends when construction is conducted in proximity to residential uses.

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98 Sacramento County. (2022). Sacramento County General Plan. Noise Element. Accessed May 28, 2026 from https://landuse.saccounty.gov/gp/no/.

99 City of Rancho Cordova. (2006). General Plan Noise Element. Accessed May 28, 2026 from https://www.cityofranchocordova.org/departments/community-development/planning/planning-division-document-library#docaccess-bc113b31a76eff61e4f5db929b03feac.

- **Action N.1.4.3:** Require stationary construction equipment and construction staging areas to be set back from existing noise-sensitive land uses.

- **Action N.1.4.7:** To the extent feasible and appropriate, the City shall require the use of temporary construction noise control measures for public and private projects that may include the use of temporary noise barriers, temporary relocation of noise-sensitive land uses or other appropriate measures.

- **Policy N.2.2: Ensure that operational noise levels of new roadway projects will not result in significant noise impacts.**

  - **Action N.2.2.1:** Assess the significance of the noise increase of all roadway improvement projects in existing areas according to the following criteria:

    - Where existing traffic noise levels are less than 60 dB L_{dn} at the outdoor activity areas of noise-sensitive uses, a +5 dB L_{dn} increase in noise levels due to roadway improvement projects will be considered significant; and

    - Where existing traffic noise levels range between 60 and 65 dB L_{dn} at the outdoor activity areas of noise-sensitive uses, a +3 dB L_{dn} increase in noise levels due to roadway improvement projects will be considered significant; and

    - Where existing traffic noise levels are greater than 65 dB L_{dn} at the outdoor activity areas of noise-sensitive uses, a +1.5 dB L_{dn} increase in noise levels due to roadway improvement projects will be considered significant.

CITY OF RANCHO CORDOVA MUNICIPAL CODE

Chapter 6.68 of the Rancho Cordova Municipal Code (RCMC) contains regulations pertaining to the creation of noise and establishes regulations to protect those within the City from excessive, unnecessary, and offensive levels of noise. Section 6.68.090 specifies activities that are exempt from the City's noise regulations, stating that "[n]oise sources associated with construction, repair, remodeling, demolition, paving or grading of any real property, provided said activities do not take place between the hours of 8:00 p.m. and 6:00 a.m. on weekdays and Friday commencing at 8:00 p.m. through and including 7:00 a.m. on Saturday; Saturdays commencing at 8:00 p.m. through and including 7:00 a.m. on the next following Sunday and on each Sunday after the hour of 8:00 p.m.; provided, however, when an unforeseen or unavoidable condition occurs during a construction project and the nature of the project necessitates that work in process be continued until a specific phase is completed, the contractor or owner shall be allowed to continue work after 8:00 p.m. and to operate machinery and equipment necessary until completion of the specific work in progress can be brought to conclusion under conditions which will not jeopardize inspection acceptance or create undue financial hardships for the contractor or owner.

Section 6.68.070 of the RCMC establishes exterior noise standards that are not to be exceeded at the property line of a receiving land use. These exterior noise standards are presented in **Table IS-13.**

Table IS-13: City of Rancho Cordova Municipal Code Exterior Noise Standards

Noise Area	City Zoning Districts	Time Period	Exterior Noise Standard
1	RE-1, RD-1, RE-2, RD-2, RE-3, RD-3, RD-4, R-1-A, RD-5, R-2, RD-10, R-2A, RD-20, R-3, RD-30, RD-40, RM-1, RM-2, A-1-B, AR-1, A-2, AR-2, A-5, AR-5	7:00 a.m. – 10:00 p.m.	55 dBA
		10:00 p.m. – 7:00 a.m.	50 dBA

dBA = A-weighted decibels
Source: City of Rancho Cordova Municipal Code, Section 6.68.070.

Section 6.68.090 specifies specific regulations for machinery, equipment, fans, and air conditioning equipment. It states that equipment must comply with a maximum limit of 55 dBA at any point at least one foot inside the property line of the affected residential property and three to five feet above ground level.

Impact Discussion

a. *Would the project generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

RNG Plant

No Impact. As previously stated, construction and operation of the RNG Plant would be located within the interior of Kiefer Landfill on previously disturbed land. Additionally, there are no noise-sensitive receptors within one mile of the active landfill. Therefore, noise evaluation for construction and operation of the RNG Plant itself was not required per Sacramento County.

RNG Pipeline Construction-Related Noise

General Construction Activity

Less than Significant with Mitigation. Construction noise associated with the proposed RNG pipeline and associated compressor/M&R station would be generated by heavy-duty diesel construction equipment used for site preparation/grading, building construction, paving, grubbing/land clearing, drainage, utilities, and sub-grade activities. Pipeline construction activities would be mobile and would continue to move in a linear path along the pipeline alignment as construction continues; therefore, exposure of sensitive receptors along the project alignment to construction noise would be temporary in nature.

Construction noise was evaluated at nearby sensitive receptors under the conservative assumption that the two loudest pieces of equipment would be operating simultaneously. **Table IS-14** shows estimated construction noise levels at sensitive receptors during each phase of project construction. Noise levels in **Table IS-14** conservatively do not account for shielding from any intervening buildings, terrain, or other nearby structures or site features.

Table IS-14: Estimated Construction Noise Levels at Nearby Sensitive Receptors (General Construction Activity

Construction Noise Level (dBA L_{eq} [8-hour])							
Construction Phase	**RCNM Reference Noise Level**	**Nearest Single-Family Residential Property Along Fiorenza Lane**	**Nearest Single-Family Residential Property Along Andria Lane**	**Nearest Single-Family Residential Property Along Kiefer Boulevard**	**Nearest Single-Family Residential Property Along Sunrise Boulevard**	**Nearest Single-Family Residential Property Along Aristotle Circle**	**Heron Landing Community Park**
Distance (feet)	50	20	70	115	125	150	180
Site Preparation and Grading[1]	84	92	81	77	76	74	73
Building Construction[2]	80	88	77	73	72	70	69
Paving[3]	85	92	82	78	77	75	74
Grubbing and Land Clearing[4]	86	93	82	78	78	75	74
Drainage, Utilities, and Sub-Grade[5]	85	92	81	78	77	74	74

dBA = A-weighted decibels; Leq = equivalent continuous sound level; RCNM = Roadway Construction Noise Model
[1] Site preparation and grading phase was evaluated assuming simultaneous operation of an excavator and grader.
[2] Building construction phase was evaluated assuming simultaneous operation of a crane and front-end loader.
[3] Paving phase was evaluated assuming simultaneous operation of a concrete mixer truck and paver.
[4] Grubbing and land clearing phase was evaluated assuming simultaneous operation of a concrete saw and tractor.
[5] Drainage, utilities, and sub-grade phase was evaluated assuming simultaneous operation of a dozer and excavator.
Source: Refer to Appendix G Noise Study Appendix A for construction noise modeling results.

As shown in **Table IS-14**, construction noise levels at sensitive receptors located along Fiorenza Lane and Andria Lane (i.e., residences adjacent to pipeline alignment Option 2B) would reach up to 93 dBA L_{eq} (8-hour), which would exceed the applicable construction noise threshold of 80 dBA L_{eq} (8-hour) recommended by the FTA and result in potentially significant impacts. In order to reduce construction noise impacts upon these receptors to less-than-significant levels, implementation of Mitigation Measure N-1 would be required. Mitigation Measure N-1 involves the creation of a Construction Noise Management Plan prior to the start of construction activities associated with pipeline alignment Option 2B.

Conversely, construction noise levels would be approximately 78 dBA L_{eq} (8-hour) and below at the remaining single-family residential properties located near the pipeline

alignment options, which would not exceed the applicable construction noise threshold of 80 dBA L_{eq} (8-hour). Furthermore, construction activities would continue along the pipeline alignment as project construction continues; therefore, exposure of sensitive receptors to construction noise at a given location would be temporary and would continue to decrease as equipment moves farther away and progresses along the pipeline alignment. Temporary noise impacts associated with construction of the project at these farther sensitive receptors would be less than significant.

Horizontal Directional Drilling (HDD) Activity

Less than Significant Impact. During construction of the proposed project, HDD methods would be used at select aquatic resources, roadway crossings and commercial/residential areas. Three HDD locations represent the greatest potential for adverse noise impacts due to close proximity to nearby sensitive receptors: the location along Kiefer Boulevard located approximately 975 feet west of Rancho Cordova Parkway, the location along Sunrise Boulevard approximately 350 feet south of Bosphorus Drive, and the location along the Folsom South Canal and adjacent to Andria Lane. Estimated noise levels associated with HDD methods are presented at the nearest sensitive receptors in **Table IS-15**.

Table IS-15: Estimated Construction Noise Levels at Nearest Sensitive Receptors (HDD Activity[1])

HDD Location	Nearest Sensitive Receptor	Distance to Sensitive Receptor (feet)	Construction Noise Level at Sensitive Receptor (dBA Leq [8-hour])	Applicable Noise Threshold (dBA Leq [8-hour])	Exceeds Applicable Threshold ?
Along the Folsom South Canal (entry)	Single-family residences along Andria Lane	70	79	80	No
Along the Folsom South Canal (exit)	Single-family residences along Venitia Lane	385	64	80	No
Along Sunrise Boulevard, approximately 350 feet south of Bosphorus Drive (entry)	Single-family residences along Sunrise Boulevard	195	70	80	No
Along Sunrise Boulevard, approximately 350 feet south of Bosphorus Drive (exit)	Single-family residences along Sunrise Boulevard	280	67	80	No
Along Kiefer Boulevard, approximately 975 feet west of Rancho Cordova Parkway (entry)	Single-family residences along Kiefer Boulevard	400	63	80	No

Table IS-15: Estimated Construction Noise Levels at Nearest Sensitive Receptors (HDD Activity[1])

HDD Location	Nearest Sensitive Receptor	Distance to Sensitive Receptor (feet)	Construction Noise Level at Sensitive Receptor (dBA Leq [8-hour])	Applicable Noise Threshold (dBA Leq [8-hour])	Exceeds Applicable Threshold ?
Along Kiefer Boulevard, approximately 975 feet west of Rancho Cordova Parkway (exit)	Single-family residences along Kiefer Boulevard	450	62	80	No

dBA = A-weighted decibels; Leq = equivalent continuous sound level; RCNM = Roadway Construction Noise Model
[1] HDD Methods phase was evaluated assuming simultaneous operation of a drill rig and generator set.
Source: Refer to Appendix G Noise Study Appendix A for construction noise modeling results.

As shown in **Table IS-15**, construction noise levels associated with HDD methods would reach approximately 79 dBA Leq (8-hour) at the nearest sensitive receptors located along Andria Lane, which would not exceed the applicable construction noise threshold of 80 dBA Leq (8-hour). Furthermore, implementation of Mitigation Measure N-1 would include installation of temporary noise barriers along this section of the project alignment between the project site and these sensitive receptors, which would further reduce noise impacts associated with HDD methods at these sensitive receptors. Temporary construction noise impacts associated with HDD methods would be less than significant.

Construction Vehicle Trips

Less than Significant Impact. Construction of the project would generate new, temporary vehicle trips that would increase noise levels on nearby roadways (primarily on Zinfandel Drive, Sunrise Boulevard, Douglas Road, and Kiefer Boulevard). New vehicle trips would be from worker and haul trips to and from the project site. Construction of the project would generate an additional 97 daily one-way trips during the peak phase of construction (i.e., the drainage, utilities, and sub-grade phase). The total number of vehicle trips generated during construction would include both inbound and outbound trips; therefore, the project would generate a total of 194 daily trips during the peak phase of construction. A comparison of existing traffic volumes and project-generated construction vehicle trips on roadway segments nearest to the project site are presented in **Table IS-16.**

Table IS-16: Existing Roadway Data[1]

Roadway	Segment	Existing ADT	Existing L_{dn} at 100 feet (dBA)
Zinfandel Drive	White Rock Road to International Drive	19,700	66
Douglas Road	Mather Boulevard to Sunrise Boulevard	5,000	60
Sunrise Boulevard	Douglas Road to SR 16	20,000	66
Kiefer Boulevard	Grant Line Road to SR 16	1,625	55

ADT = average daily traffic; L_{dn} = day-night equivalent level; dBA = A-weighted decibels; SR = State Route
[1] Daily project-generated construction trips = 194
Source: City of Rancho Cordova. (2006). General Plan Draft Environmental Impact Report.

Traffic noise increases were based on the principle that a doubling of traffic volumes (or combined noise level from two identical sources) results in a noise increase of 3 dBA. As shown in **Table IS-17**, temporary traffic noise increases on roadway segments near the project site during construction of the proposed project would not exceed the respective traffic noise increase thresholds. Therefore, temporary traffic noise impacts would be less than significant.

Table IS-17: Estimated Traffic Noise Increases During Construction of the Project

Roadway	Segment	Existing ADT	Existing ADT + Daily Project-Generated Construction Vehicle Trips	Noise Increase (dBA L_{dn})	Applicable Noise Threshold (dBA L_{dn})[1]
Zinfandel Drive	White Rock Road to International Drive	19,700	19,894	0.04	1.5
Douglas Road	Mather Boulevard to Sunrise Boulevard	5,000	5,194	0.17	3
Sunrise Boulevard	Douglas Road to SR 16	20,000	20,194	0.04	1.5
Kiefer Boulevard	Grant Line Road to SR 16	1,625	1,819	0.49	5

ADT = average daily traffic; dBA = A-weighted decibels; L_{dn} = day-night equivalent level; SR = State Route
[1] Methodology for the traffic noise thresholds is detailed in Appendix G: Noise Study.
Source: Refer to Appendix G.

RNG Pipeline Operational Noise

Once operational, the proposed project's underground pipeline would not produce any aboveground noise. Under pipeline alignment Option 1, a compressor station is proposed along Douglas Boulevard, west of Sunrise Boulevard, with an alternate location approximately 800 feet southeast of the intersection of Douglas Road and Sunrise Boulevard. Under pipeline alignment Option 2, the compressor station would be located approximately 800 feet southeast of the intersection of Douglas Road and Sunrise Boulevard. The compressor would be located approximately 130 feet from the nearest residential property line to the east.

Based on information provided by the compressor manufacturer, each unhoused compressor generates a noise level of 88.6 dBA at a distance of one meter. Noise levels would be reduced by at least 20 dBA with the addition of a sound-attenuating enclosure to 68.6 dBA at one meter and a perimeter wall. The unenclosed cooling fan would produce a noise level of 75.6 dBA at one meter.

Pipeline Alignment Option 1

Less Than Significant Impact. Under pipeline alignment Option 1, the base-case compressor station would be located along Douglas Road, approximately 375 feet from the nearest residential property line to the south. Depending on the exact location of the station's compressor skid, operational noise levels at the nearest residences to the south would vary. An approximately 12-foot-tall perimeter wall would be constructed around the compressor station boundary to shield surrounding land uses from noise generated within the compressor station area. It is estimated that the perimeter wall would provide between 7 and 10 dBA of noise reduction. Operational noise levels at various distances, which include the estimated noise reduction from the perimeter wall, are presented in **Table IS-18**.

Table IS-18: Operational Noise Levels Associated with Compressor Station (Option 1)

Noise Source	Operational Noise Level (dBA)[1]						
Distance from Noise Source (feet)	400	425	450	475	500	525	550
Compressor Skid (Compressor and Cooling Fan)	25.1[2]	25.6	25.6	25.5	25.3	25.1	24.8

dBA = A-weighted decibels
[1] Operational noise levels presented account for simultaneous operation of compressor and cooling fan. Operational noise levels include the noise reduction provided by the proposed enclosure, which would reduce compressor noise by approximately 20 dBA. Operational noise levels also account for the noise reduction provided by the perimeter wall, which would provide between approximately 7 and 10 dBA of reduction depending on the location of the compressor skid relative to the perimeter wall.
[2] Note that this noise level assumes the compressor skid would be situated near the southern boundary of the compressor station area, which conservatively represents an assumed location closest to nearby sensitive receptors.
Source: Refer to Appendix G.

As shown in **Table IS-18**, combined noise levels produced by simultaneous operation of the compressor and cooling fan would reach up to approximately 25.1 dBA when accounting for the noise reduction provided by the compressor enclosure and the proposed perimeter wall. This noise level would not exceed the City's daytime or nighttime noise limits of 55 and 50 dBA, respectively, at the nearest residential property line. Impacts would be less than significant.

Alternate Compressor Station Location

Less than Significant with Mitigation. Under the alternate compressor station location option, the compressor skid would be situated approximately 130 feet from the nearest residential property to the east. Operational noise levels at various distances are presented in **Table IS-19** to illustrate how the noise level varies with distance from the source. It is estimated that the perimeter wall would provide between 10 and 16 dBA of noise reduction.

Table IS-19: Operational Noise Levels Associated with Compressor Station (Alternate Location)

Noise Source	Operational Noise Level (dBA)[1]					
Distance from Noise Source (feet)	75	100	125	130	150	175
Compressor Skid (Compressor and Cooling Fan)[2]	31.2	35	34.4	34.4[2]	33.4	32.3

dBA = A-weighted decibels
[1] Operational noise levels presented account for simultaneous operation of compressor and cooling fan. Operational noise levels include the noise reduction provided by the proposed enclosure, which would reduce compressor noise by approximately 20 dBA. Operational noise levels also account for the noise reduction provided by the perimeter wall.
[2] Note that this represents the estimated noise level under the current location of the compressor skid shown in the provided site plan.
Source: Refer to Appendix G.

As shown in **Table IS-19**, combined noise levels would be approximately 34.2 dBA at the nearest residential property line to the east, which would not exceed the City's daytime or nighttime noise limits of 55 and 50 dBA, respectively. Noise levels would still comply with the City's daytime and nighttime noise limits even if located as close as 75 feet from the nearest residential property line. Impacts would be less than significant.

b. Would the project generation of excessive groundborne vibration or groundborne noise levels?

Less than Significant Impact. Construction equipment expected to generate the highest levels of ground-borne vibration would include large earthmoving equipment (such as a dozer, grader, excavator, or tractor). As shown in **Table IS-20** below, vibration levels generated during construction would not exceed the FTA's thresholds of 0.3 and 0.2 in/sec PPV at the nearest commercial and residential structures, respectively, near the project site. Temporary vibration impacts associated with construction of the proposed project would be less than significant.

Table IS-20: Estimated Vibration Levels at Nearest Structures

Equipment	Vibration Level (in/sec PPV)						
	Reference Vibration Level	**Nearest Single-Family Residence Along Fiorenza Lane**	**Nearest Commercial Structure Along Kiefer Boulevard**	**Nearest Single-Family Residence Along Andria Lane**	**Nearest Single-Family Residence Along Kiefer Boulevard**	**Nearest Single-Family Residence Along Aristotle Circle**	**Nearest Single-Family Residence Along Sunrise Boulevard**
Distance from Equipment (feet)[1]	25	15	15	35	85	100	120
Large[2] Earthmoving Equipment (e.g., Dozer, Excavator, Grader, Tractor, etc.)	0.089	0.191	0.191	0.054	0.014	0.011	0.008

in/sec = inches per second; PPV = peak particle velocity
[1] Distances to sensitive receptors were calculated based on the closest distance that equipment may be used according to the limits of work boundaries.
[2] "Large" in this context refers to equipment rated at 100 horsepower or greater.
Source: Refer to Appendix G.

Environmental Mitigation Measures

The following mitigation measure would be implemented during construction of the project associated with Pipeline Alignment Option 2B to reduce potential impacts related to noise.

NOI-1: Construction Noise Management Plan for Pipeline Alignment Option 2B

Prior to the start of construction activities associated with pipeline alignment Option 2B, a Construction Noise Management Plan shall be created that includes the following:

- Prior to the initiation of construction activities occurring within 100 feet of residences within the Tricon Sunridge residential community along Fiorenza Lane and Andria Lane, the contractor shall install temporary sound barriers and/or blankets and also maintain the sound barriers and/or blankets during such construction activities. Temporary sound barriers and/or blankets shall meet the following specifications:

    - The temporary sound barriers and/or blankets shall be installed in between the residences along Fiorenza Lane and Andria Lane and the construction area.

    - The temporary barriers/blankets shall be a minimum of 15 feet in height to block the line of sight between the construction area and the sensitive receptors along this section of the project alignment. Temporary blankets shall be of sufficient height to extend from the top of the temporary construction fence and drape on the ground or be sealed at the ground.

  - Barriers shall be constructed with a solid material that has a density of at least 1 pound per square foot with no gaps from the ground to the top of the barrier. The barriers shall have an STC rating of 32 or higher.

- At least 10 days prior to the start of construction activities occurring near residences within the Tricon Sunridge residential community, a sign shall be posted at the construction site, or other conspicuous location, that includes a telephone number for project information, and a procedure in which a construction manager will respond to and investigate noise complaints and take corrective action, if necessary, in a timely manner.

- At least 21 days prior to the start of construction activities, residences within the Tricon Sunridge residential community shall be notified of the planned construction activities. The notification shall include a brief description of the project, the activities that would occur, the hours when construction would occur, and the construction period's overall duration. The notification shall include the telephone numbers of the City's and contractor's authorized representatives that are assigned to respond in the event of a noise complaint.

- If a construction noise complaint is registered and if a member of the City's Code Enforcement team is not available to make noise measurements, the Applicant, if and as directed by the City, shall retain a City-approved noise consultant to conduct noise measurements at the properties that registered the complaint. The noise measurements shall be conducted for a minimum of one hour. The consultant shall prepare a letter report for code enforcement summarizing the measurements, calculation data used in determining impacts, and potential measures to reduce noise levels to the maximum extent feasible.

- Prior to the start of and for the duration of construction, the contractor shall properly maintain and tune all construction equipment in accordance with the manufacturer's recommendations to minimize noise emissions.

- Prior to use of any construction equipment, the contractor shall fit all equipment with properly operating mufflers, air intake silencers, and engine shrouds no less effective than as originally equipped by the manufacturer.

- Material hauling and deliveries shall be coordinated by the construction contractor to reduce the potential of trucks waiting to unload for protracted periods of time.

- To the extent feasible, hydraulic equipment shall be used instead of pneumatic impact tools, and electric-powered equipment shall be used instead of diesel-powered equipment.

- Stationary noise sources (e.g., generators) shall be located as far from sensitive receptors as practicable, and they shall be muffled and enclosed within temporary sheds, or insulation barriers with a minimum STC rating of 32.

- The use of bells, whistles, alarms, and horns shall be restricted to safety warning purposes only.

- Signs shall be posted at the job site entrance(s), within the on-site construction zones, and along queueing lanes (if any) to reinforce the prohibition of unnecessary engine idling. All other equipment shall be turned off if not in use for more than five minutes. The construction manager shall be responsible for enforcing this.

XV. POPULATION AND HOUSING

Would the project:	**Potentially Significant**	**Less than Significant with Mitigation**	**Less than Significant**	**No Impact**
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

ENVIRONMENTAL SETTING

KLG RNG PLANT

The proposed RNG Plant is in a rural area of Sloughouse within unincorporated Sacramento County. No residential uses are present within a one-mile radius of the project site.

RNG PIPELINE AND COMPRESSOR/M&R STATION SITES

Option 1 and 2 pipeline alignments follow the right-of-way along Kiefer Boulevard until the intersection of Rancho Cordova Parkway. Surrounding land uses between the RNG plant site and this intersection include agricultural, open space, and medium/low density residential. Option 2 extends further west along the right-of-way along Kiefer Boulevard, onto Sunrise Boulevard and Douglas Road. Surrounding land uses adjacent to both pipeline alignment options and compressor/M&R station locations include natural resource space, residential, commercial, light industrial, open space and parks, and recreational uses.

IMPACT DISCUSSION

a. *Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?*

Less Than Significant Impact. The project involves the construction and operation of an RNG plant within the existing Kiefer Landfill, along with an associated RNG pipeline and compressor/M&R stations. The project would not have a direct effect on area population levels because it does not involve the construction of new housing. While new housing is not the sole contributor to unplanned population growth, the project would not indirectly induce growth through the expansion of infrastructure or otherwise support additional development in the surrounding area. Given the scale of the project, employment opportunities generated

by construction and operation of the facility are expected to be filled by the existing regional workforce. Therefore, the project would not induce population growth and impacts would be less than significant.

b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The RNG plant would be located on a parcel zoned for agricultural use within the existing Kiefer Landfill, and the pipeline alignment options follow existing public road rights-of-way and require adjacent public easements. Additionally, the compressor/M&R stations would be constructed on existing vacant land along Douglas Road zoned for commercial use. No residences are located within the project site, and no housing would be removed or otherwise displaced. While some residential uses are located adjacent to portions of the pipeline alignment, the pipeline would be installed underground within existing rights-of-way and would not result in the removal or permanent disturbance of nearby housing. Therefore, the project would not displace people or housing or require the construction of replacement housing elsewhere and no impacts would occur.

Environmental Mitigation Measures

None recommended.

XVI. Public Services

Would the project:	**Potentially Significant**	**Less than Significant with Mitigation**	**Less than Significant**	**No Impact**
a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
Fire protection?	☐	☐	☒	☐
Police protection?	☐	☐	☒	☐
Schools?	☐	☐	☐	☒
Parks?	☐	☐	☒	☐
Other public facilities?	☐	☐	☒	☐

Environmental Setting

The RNG plant site is situated in a predominately rural area of eastern Sacramento County where public services and infrastructure are already provided. The proposed RNG pipeline alignment options follow the right-of-way of Kiefer Boulevard and Option 2 extends onto Sunrise

Boulevard and Douglas Road. The compressor/M&R station site options and the pipeline options would be adjacent to the residential communities of Rancho Cordova Village and Sunrise Anatolia Village.

FIRE PROTECTION

CAL FIRE has a legal responsibility to provide fire protection on all State Responsibility Area (SRA) lands, including the RNG plant site/Kiefer Landfill area.[100] See Section XXI. Wildfire for a detailed discussion of fire protection for the RNG plant site.

Both options for the pipeline alignment and both compressor/M&R station site options are located within the SMFD service area.

The closest fire station to the RNG plant site is SMFD Station 58 located at 7250 Sloughhouse Road, approximately 1.7 miles southwest of the RNG plant site. SMFD Station 68, located at 12065 Cobble Brook Drive, is approximately 1 mile east of the pipeline alignment options and approximately 3.5 miles northwest of the RNG plant.

POLICE PROTECTION

Police protection for the RNG plant site and the pipeline alignment options, as well as the compressor/M&R station site options, is provided by the Sacramento County Sheriff's Department. The project area lies within the service area of the Rancho Cordova Police Department/Sacramento County Sheriff's East Division. The nearest station is located at 2897 Kilgore Road, Rancho Cordova, CA 95670, approximately 7.2 miles northwest of the RNG plant site and approximately 3 miles north of the pipeline alignment and compressor station/M&R station options on Douglas Road.

SCHOOLS

No schools are present on-site or immediately adjacent to the RNG plant/Kiefer Landfill or the Option 1 pipeline alignment which ends at the intersection of Rancho Cordova Parkway and Kiefer Boulevard.

The Option 2 pipeline alignment and the base-case compressor/M&R station and alternate location are all located within the Elk Grove Unified School District. Listed below are the nearest applicable schools and nearest distance to the pipeline and both station location options.

- Sunrise Elementary School (11821 Cobble Brook Drive)
    - Approximately 0.28 miles east of Option 2 pipeline alignment (Sunrise Boulevard)
    - Approximately 0.42 miles southeast of the base-case compressor/M&R location
    - Approximately 0.22 miles southeast of the alternate compressor/M&R location
- Robert J. McGarvey Elementary School (4350 Sophistry Drive)

[100] California Open Data Portal, California State Responsibility Areas, accessed January 28, 2026, from https://data.ca.gov/dataset/california-state-responsibility-areas#:~:text=CAL%20FIRE%20has%20a%20legal,population%20density%20and%20land%20use.

- Approximately 0.53 miles east of Option 2 pipeline alignment (Sunrise Boulevard)
- Approximately 1.10 miles southeast of the base-case compressor/M&R location
- Approximately 0.92 miles southeast of the alternate compressor/M&R location

PARKS

No parks are present on-site or immediately adjacent to the RNG plant site. The closest park to the Option 1 pipeline is Kavala Ranch Park, located approximately 2,700 feet northwest. The Option 2 pipeline alignment and the base-case and alternate compressor/M&R station sites would be located in the Cordova Recreation and Park District service area. Several parks managed by this district are located adjacent to or within 0.5 miles of the pipeline and the station locations, including:

- Mather Regional Park (4111 Eagles Nest Road)
  - Adjacent to the north of Option 2 pipeline alignment (Douglas Road)
  - Approximately 0.65 miles west of the base-case compressor/M&R location
  - Approximately 0.89 miles west of the alternate compressor/M&R location
- Heron Landing Community Park (11750 Justinian Drive)
  - Adjacent to the east of Option 2 pipeline alignment (Sunrise Boulevard)
  - Approximately 1.38 miles southeast of the base-case compressor/M&R location
  - Approximately 1.38 miles south of the alternate compressor/M&R location
- Argonaut Park (11825 Herodian Drive)
  - Approximately 0.20 miles east of Option 2 pipeline alignment (Sunrise Boulevard)
  - Approximately 0.42 miles southeast of the base-case compressor/M&R location
  - Approximately 0.22 miles southeast of the alternate compressor/M&R location
- Eagle's Nest Park (11810 Chrysanthy Boulevard)
  - Approximately 0.25 miles east of Option 2 pipeline alignment (Sunrise Boulevard)
  - Approximately 0.82 miles southeast of the base-case compressor/M&R location
  - Approximately 0.71 miles southeast of the alternate compressor/M&R location
- Sandpiper Park (11830 Appolon Drive)
  - Approximately 0.40 miles east of Option 2 pipeline alignment (Sunrise Boulevard)
  - Approximately 1.09 miles southeast of the base-case compressor/M&R location

  - Approximately 0.96 miles southeast of the alternate compressor/M&R location

- Kavala Ranch Park (5100 Azalea Park Way)
  - Approximately 0.39 miles north of Option 2 pipeline alignment (Kiefer Boulevard)
  - Approximately 1.99 miles southeast of the base-case compressor/M&R location
  - Approximately 1.88 miles southeast of the alternate compressor/M&R location

Additionally, the proposed Option 2 pipeline alignment would run along the Folsom South Canal Recreation Trail managed by the U.S. Bureau of Reclamation.

IMPACT DISCUSSION

a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

Fire protection?

Less Than Significant Impact. Sacramento Metropolitan Fire District provides fire protection to the surrounding vicinity of the project area. Neither the RNG plant nor the pipelines and their respective stations are located within a Very High or High FHSZ, but are in a Moderate FHSZ in an SRA. The project must adhere to applicable requirements for emergency vehicle access including roadway widths and turning radii, fire flow and sprinkler requirements, and vehicle ingress/egress. Compliance with these requirements would ensure adequate emergency access and evacuation routes. No new or physically altered fire facilities would be needed to adequately serve the project. Therefore, impacts would be less than significant.

Police protection?

Less Than Significant Impact. Police services would continue to be provided by the Sacramento County Sheriff's Office. Associated construction and ongoing operations would not measurably increase demand for law enforcement protection. The RNG plant location is located within the interior of the landfill which has fencing and security preventing public access without the landfill’s knowledge. No new or physically altered police facilities would be needed to adequately serve the project. Therefore, impacts would be less than significant.

Schools?

No Impact. The project would not result in a population increase, and therefore, would not increase the number of students. No impacts would occur.

Parks?

Less Than Significant Impact. This project would not result in a population increase and therefore would not increase the use of parks and recreational facilities. Pipeline alignment Option 2B runs adjacent to the east of the Folsom South Canal, which includes the Folsom South Canal Recreational Trail, a publicly accessible trail operated for recreational use. Construction in environmentally sensitive areas, such as along the Folsom South Canal, would use HDD to minimize surface impacts. Installation may require temporary, localized trail closures or access restrictions, particularly near the Douglas Road overpass, to maintain public safety during active construction. Any such closures would be short-term, limited to the duration of construction in the affected area, and coordinated to maintain access to the extent feasible. Upon completion of pipeline installation, the recreational trail would be restored to pre-construction conditions and fully reopened. Project operation would not result in ongoing access restrictions or physical alterations to the trail. Therefore, impacts would be less than significant.

Other public facilities?

Less Than Significant Impact. Refer to the discussion above regarding the Folsom South Canal Recreational Trail. There are no other public facilities or government services that would be significantly impacted as a result of the project.

Environmental Mitigation Measures

None recommended.

XVII. Recreation

Would the project:	**Potentially Significant**	**Less than Significant with Mitigation**	**Less than Significant**	**No Impact**
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

Environmental Setting

As previously discussed in Section XVI. Public Services, no public parks or recreational facilities are present on-site or immediately adjacent to the RNG plant site or the Option 1 pipeline which ends at the intersection of Rancho Cordova Parkway and Kiefer Boulevard. The Option 2 pipeline alignment and the proposed compressor/M&R station sites are located within the Cordova Recreation and Park District service area which manages a number of parks located adjacent to or within 0.5 miles of the pipeline alignment and both station locations, including Mather Regional Park, Heron Landing Community Park, Argonaut Park, Eagle's Nest Park, Sandpiper Park, and Kavala Ranch Park.

In addition, the Option 2 pipeline alignment adjacent to Sunrise Boulevard is located east of a parcel zoned for recreation encompassing a portion of the Folsom South Canal Recreational Trail. The Folsom South Canal Recreational Trail is a two-lane paved trail used for bicycling and walking which runs along the west side of the canal.

Impact Discussion

a. *Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?*

   No Impact. The project involves the construction and operation of an RNG plant and associated RNG pipeline and compressor/M&R stations. The proposed development would not increase the local population. Therefore, the project would not result in an increase in the use of existing neighborhood and regional parks or other recreational facilities. Therefore, no impacts would occur.

b. *Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?*

   No Impact. The project does not include recreational facilities or require construction or expansion of recreational facilities. Therefore, no impacts would occur.

Environmental Mitigation Measures

None recommended.

XVIII. TRANSPORTATION

Would the project:	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b. Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b) – measuring transportation impacts individually or cumulatively, using a vehicles miles traveled standard established by the County?	☐	☐	☒	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d. Result in inadequate emergency access?	☐	☐	☒	☐

ENVIRONMENTAL SETTING

KLG RNG PLANT

The RNG plant site is located within the Kiefer landfill property. Roadways near the plant site are Kiefer Boulevard and Grant Line Road. The site itself is accessed from an internal landfill roadway, Main Road, that intersects Kiefer Boulevard approximately 0.70 miles southeast of the Kiefer Boulevard/Grant Line Road intersection.

Kiefer Boulevard (south of Grant Line Road) is classified as a pre-2030 four-lane arterial.[101] However, in its existing condition, Kiefer Boulevard functions as a two-lane roadway with one travel lane in each direction. The corridor is generally characterized by open space on both sides, with perimeter fencing and overhead utility/service poles on the east side of the roadway between the landfill entrance and Grant Line Road.

Grant Line Road, located north of the RNG plant site, is designated as a Capital Southeast Connector (Expressway Segment).[102] Expressways are high capacity and limited access facilities that provide regional mobility with minimal interruptions to traffic flow. In this area, Grant Line Road functions as a major north–south connector within the County's roadway network and supports regional goods movement, commuter traffic, and access to the Capital Southeast Connector corridor.

[101] Sacramento County, Sacramento County General Plan, Circulation Element; Transportation Plan Roadway Components.

[102] Ibid.

TRANSIT

No fixed route bus service, park and ride lots, or transit stops are located within the RNG plant site or immediately adjacent to it.

RNG PIPELINE

KIEFER BOULEVARD SEGMENT

Both Option 1 and Option 2 of the proposed pipeline alignment follow Kiefer Boulevard from the landfill entrance to an unlabeled roadway north of Blodgett Reservoir. Both options then follow an unpaved portion of Kiefer Boulevard until Rancho Cordova Parkway. Option 2 continues west of this intersection along Kiefer Boulevard, and this roadway is characterized by sidewalks and landscaped frontage on the north side of the road, with open space and utility corridors on the south side. A signalized intersection is present at the Kiefer Boulevard/Sunrise Boulevard junction. This location also includes a Class II bicycle lane connecting to the Sunrise Boulevard bikeway.[103]

SUNRISE BOULEVARD SEGMENT

The Option 2 pipeline alignment continues north–south along Sunrise Boulevard, a post-2030 thoroughfare.[104] Sunrise Boulevard is a limited access roadway, designed to restrict driveway openings and local access points to enhance safety and maintain uninterrupted traffic flow. The roadway currently consists of multiple travel lanes and a center median composed of both concrete and landscaped segments. A Class II bicycle lane is present along both the northbound and southbound sides of Sunrise Boulevard. A signalized intersection connects Sunrise Boulevard to Douglas Road.

DOUGLAS ROAD SEGMENT

West of Sunrise Boulevard, the Option 2A pipeline alignment follows Douglas Road, which is also designated as a post-2030 thoroughfare,[105] until the intersection with Eagles Nest Road. Douglas Road provides east–west connectivity but is currently more limited in its supporting infrastructure. Sidewalks are intermittent west of Sunrise Boulevard, and the surrounding area consists predominantly of commercial or light industrial uses.

TRANSIT

Transit services along Kiefer Boulevard (west of Rancho Cordova Parkway) include the Kiefer and Country Garden westbound bus stop (Stop ID: 949), which is served by Bus Line 176. Transit services along Sunrise Boulevard include the northbound and southbound Sunrise Boulevard and Herodian Drive bus stops (Stop ID: 1763 and 1760, respectively), which are served by the Sacramento Regional Transit District's Bus Line 175. There are no transit services west of Douglas Road.

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[103] Rancho Cordova. Bikeways Map. Accessed May 29, 2026 from https://data-ranchocordova.opendata.arcgis.com/datasets/93771299c8a3450998aed85e2ec4e38e_0/explore?location=38.525729%2C-121.229067%2C8.

[104] Sacramento County, Sacramento County General Plan, Circulation Element; Transportation Plan Roadway Components.

[105] Ibid.

COMPRESSOR/M&R STATION

The base-case station location would be accessed via Douglas Road (a post-2030 thoroughfare). The alternate location would be accessed by internal unlabeled roadways connected to Douglas Road.

TRANSIT

No fixed route bus service, park and ride lots, or transit stops are located immediately adjacent to either station location.

REGULATORY SETTING

LOCAL

SACRAMENTO COUNTY GENERAL PLAN

The Circulation Element of the County's General Plan provides a framework for transportation decisions, encompassing various modes of transportation, including roadways, transit, and bike/pedestrian facilities. The element aims to ensure efficient and safe movement in the region and includes coordination with cities, regional plans, and state / federal agencies. Additionally, the Element considers long-term transportation needs, preserving right-of-way for future improvements and planning for transportation beyond the 20-year horizon. Roadway classifications and right-of-way standards, specific widths to account for lanes, shoulders, curb, gutter, sidewalks, bike lanes, and other features, are included within the Circulation Element.

The Transportation Plan, included within the Circulation Element, outlines the proposed circulation system for unincorporated areas, guiding long-term planning and development.

SACRAMENTO COUNTY DEPARTMENT OF TRANSPORTATION

In October 2020, Sacramento County Department of Transportation updated the Sacramento County Transportation Analysis Guidelines (TAG) to reflect the new analysis requirements.[106] This update included the development of screening criteria for development of projects and the vehicle miles traveled (VMT) thresholds of significance. The screening criteria identified that projects generating less than 237 average daily trips are considered small projects and do not require VMT analysis.

CITY OF RANCHO CORDOVA GENERAL PLAN CIRCULATION ELEMENT

The City of Rancho Cordova General Plan Circulation Element provides a comprehensive framework for addressing both existing and future transportation conditions and systems within the City. It outlines the overall vision for a balanced, efficient, and multimodal circulation network that supports mobility for vehicles, pedestrians, bicyclists, and transit users. The element establishes a coordinated set of goals, policies, and implementation actions designed to guide the planning, development, and operation of the City's circulation system. Through these

[106] Sacramento County. (2025). *Traffic Impact Analysis Guidelines.* Accessed May 29, 2026 from https://sacdot.saccounty.gov/us/en/transportation-planning/traffic-studies.html#gsc.tab=0.

provisions, it ensures that transportation infrastructure keeps pace with growth while promoting safety, connectivity, and accessibility throughout Rancho Cordova.[107]

IMPACT DISCUSSION

a. Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Less Than Significant Impact. Construction of the RNG plant is expected to occur from January 2027 to March 2028, from 7:00 a.m. to 6:00 p.m., Monday through Friday (except on federal holidays). Since construction is on landfill property which already has a volume of existing truck/equipment usage, the RNG plant construction is not expected to create notable increases in traffic volume on Kiefer Bouelvard.

Construction activities related to the RNG pipeline and compressor/M&R station may temporarily generate new vehicle trips (e.g., hauling and worker commute trips) and may result in a short-term increase in traffic levels on roadways in the overall project area. Under the Sacramento County Department of Transportation, a traffic control plan will be prepared and approved by the County to perform work that would obstruct vehicular or pedestrian traffic on a city street.[108] The traffic control plan would help maintain the flow of traffic during project construction and ensure traffic impacts remain less than significant. Given the temporary nature of construction and existing capacity on local roadways, project construction would not conflict with any applicable plan, policy, or ordinance related to the transportation system that could result in a substantial adverse environmental effect.

Operation of the proposed project would not generate measurable increases in traffic. The proposed pipelines would be entirely underground and require only periodic inspection and maintenance, with no routine operational trips or changes to existing traffic infrastructure. The compressor/M&R facilities would be sited on existing vacant parcels and rely on existing access. The RNG plant would have an additional seven employees, which would generate minimal additional traffic on Kiefer Bouelvard. Because no new public access is created, no new street connections are proposed, and operational trips would be minimal and intermittent, project operation would be accommodated by the existing roadway network and would not affect intersection control, roadway capacity, or bicycle/pedestrian/transit facilities. Accordingly, operational traffic effects would be less than significant.

b. Would the project conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b) – measuring transportation impacts individually or cumulatively, using a vehicles miles traveled standard established by the County?

Less Than Significant Impact. The project involves the development and operation of an RNG plant within the existing Kiefer Landfill and an RNG pipeline with associated compressor/M&R station(s) for distribution. The RNG plant would be operated by an

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107 City of Rancho Cordova. (2015). General Plan: Circulation Element. Accessed May 29, 2026 from https://www.cityofranchocordova.org/departments/community-development/planning/planning-division-document-library#docaccess-48dfa584f73bcbd8c3041e3c2281f2c98ba98f4cb02f44b0cdb8f3010032dfae.

108 Sacramento County. Department of Transportation. Traffic Control Plans and Detour Plans. Accessed May 29, 2026 from https://sacdot.saccounty.gov/us/en/permits/encroachment-permits-row/traffic-control-plans-and-detour-plans.html#gsc.tab=0.

additional seven employees at the Kiefer landfill. Furthermore, an additional 10 employees would come to the site twice a year for maintenance. Major maintenance and service for the RNG plant would occur twice a year. As such, the proposed project would generate less than 237 average daily trips and as defined by the County, would be considered a small project that does not require VMT analysis.[109] Therefore, impacts would be less than significant.

c. *Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*

Less Than Significant Impact. As mentioned, the RNG plant would be located entirely within the existing Kiefer Landfill and would be accessed via established internal landfill roadways. The RNG pipeline would be buried underground within existing public roadway rights-of-way and/or private easements. The compressor/M&R station would be located on private property, either south of Douglas Road west of Sunrise Boulevard at an existing PG&E pipeline interconnect, or south of Douglas Road east of Sunrise Boulevard on an open plot of land south of commercial uses. In either location, the station would be surrounded by a wall/fencing.

Temporary lane closures may be required during construction. The projected level of truck trips would generally remain at fewer than 10 per day throughout construction. However, during peak construction activities, it is anticipated that the number of off-site truck trips would be approximately 100 for the RNG plant and 50 for the pipeline construction. These high volumes would be intermittent and temporary, lasting between six to 14 months. It is not anticipated that project construction would substantially disrupt traffic in the area, including automobile, bus, and bicycle traffic. Under the Sacramento County Department of Transportation, a traffic control plan must be approved by the County in order to perform work that would obstruct vehicular or pedestrian traffic on a city street. The traffic control plan would help maintain the flow of traffic during project construction. Therefore, the project would not result in temporary roadway modifications, altered intersections, or changes to traffic patterns. As such, the project would not introduce geometric design hazards or incompatible uses, and impacts would be less than significant.

d. *Would the project result in inadequate emergency access?*

Less Than Significant Impact. The project would implement the access requirements established by Sacramento Metropolitan Fire District and Sacramento County Department of Transportation. Therefore, the project would not result in inadequate emergency access, and impacts would be less than significant.

Environmental Mitigation Measures

None recommended.

[109] Sacramento County. (2025). Traffic Impact Analysis Guidelines. Accessed May 29, 2026 from https://sacdot.saccounty.gov/us/en/transportation-planning/traffic-studies.html#gsc.tab=0.

XIX. TRIBAL CULTURAL RESOURCES

Would the project:	**Potentially Significant**	**Less than Significant with Mitigation**	**Less than Significant**	**No Impact**
a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	☒	☐
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

ENVIRONMENTAL SETTING

AB 52 (effective July 1, 2015) added PRC Sections 21073, 21074, 21080.3.1. 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3 to CEQA, relating to consultation with California Native American tribes, consideration of "tribal cultural resources," and confidentiality. Tribal cultural resources include sites, features, places, cultural landscapes, sacred places, and objects with cultural value to California Native American tribes and may be physical remains or places within a landscape (i.e., gathering places, sacred sites, features, plants, etc.).

AB 52 provides procedural and substantive requirements for lead agency consultation with California Native American tribes and consideration of effects on tribal cultural resources, as well as example of mitigation measures to avoid or minimize impacts to tribal cultural resources. AB 52 establishes that if construction of a project may cause a substantial adverse change in the significance of a tribal cultural resource, that project may have a significant effect on the environment. Lead agencies must avoid damaging effects to tribal cultural resources, when feasible, and keep information submitted by tribes confidential. AB 52 requires a lead agency to consult with California Native American tribes that are traditionally and culturally affiliated with the geographic area of the proposed project, if the tribe requested to the lead agency, in writing, to be informed by the lead agency of proposed projects in that geographic area and the tribe requests consultation. PRC Section 21080.3.1 (d) states that within 14 days of determining that an application for a project is complete or a decision by a public agency to undertake a project, the lead agency will provide formal notification to the designated contact or tribal representative

of traditionally and culturally affiliated California Native American tribes that have requested notice, which shall be accomplished by means of at least one (1) written notification that includes a brief description of the proposed project location and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation pursuant to this section.

According to the Cultural Resources Technical Report that was prepared by Rincon Consultants for the proposed project, a record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was done on November 12, 2024. The NAHC responded to the SLF request, stating that the results of the SLF search were positive meaning there are sacred lands in the vicinity of the project site. Additionally, the NAHC provided a list of tribal contacts who may have knowledge about and interest in tribal cultural resources located within the project vicinity. See Appendix H for the NAHC response, including tribal contacts list(s). The County conducted the Native American outreach with the following tribes. Consultation ended on May 4, 2026.

- Sacramento County distributed AB 52 notification letters to all interested parties on March 9, 2026. These parties included: Ione Band of Miwok Indians, Shingle Springs Band of Miwok Indians (SSBMI), United Auburn Indian Community (UAIC), and Wilton Rancheria.

- SSBMI responded on March 17, 2026, requesting to consult on the project.

- Wilton Rancheria responded on March 23, 2026, requesting to consult on the project.

- UAIC responded on March 25, 2026, declining to consult.

- Sacramento County received no response from the Ione Band of Miwok Indians.

Regulatory Setting

California Assembly Bill 52

As of July 1, 2015, AB 52 was enacted and expands CEQA by defining a new resource category, “tribal cultural resources”. AB 52 establishes, “a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment” (PRC Section 21084.2). It further states the CEQA lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible (PRC Section 21084.3).

PRC Section 21074 (a)(1)(A) and (B) define tribal cultural resources as “sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe” and that meets at least one of the following criteria, as summarized in CEQA Guidelines Appendix G:

1. Listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k)

2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section

5024.1. In applying these criteria, the lead agency shall consider the significance of the resource to a California Native American tribe.

AB 52 also establishes a formal consultation process with California Native American tribes that must be completed before a CEQA document can be certified/adopted. Under AB 52, lead agencies are required to "begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project." California Native American tribes to be included in the process are those that have requested notice of projects proposed within the jurisdiction of the lead agency.

Impact Discussion

a. *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:*

   i. *Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?*

      Less Than Significant Impact. Tribal cultural resources include sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe. As discussed in Section VI. Cultural Resources, one built environment resource, Blodgett Reservoir, was previously evaluated and recommended as ineligible for the NRHP and CRHR. The reservoir has no known relationship with historically significant people or events, and no artifacts have been identified in association with the resource. As such, no historical resources listed or eligible for listing in the CRHR, or in a local register of historical resources, have been identified within the project site. Therefore, the project would not result in a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in a state or local register of historical resources, and impacts would be less than significant.

   ii. *A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?*

      Less Than Significant With Mitigation. On March 9, 2026, consultation requests were sent to four (4) tribes that had requested notification in accordance with AB-52. County staff received two responses, from the Shingle Springs Band of Miwok Indians (SSBMI) and from the Wilton Rancheria, initiating consultation. During consultation, the Wilton Rancheria requested that the project applicant retain an official tribal monitor to observe all ground disturbance activities, while the SSBMI deferred to the Wilton Rancheria and had no additional requests. The AB-52 consultation period formally concluded on May 4, 2026.

      As a result of tribal consultation, County Planning and Environmental Review has determined there is a potential for buried tribal cultural resources in the vicinity of the project site. However, Mitigation Measure TCR-1, which requires an official tribal

monitor during all ground disturbance activities, would be implemented during construction. In the event of an unanticipated discovery, Mitigation Measures CUL-1 and CUL-2 would ensure proper evaluation and management of unanticipated discoveries of potential tribal cultural resources (TCRs), archaeological, or cultural resources that may occur during the project's ground-disturbing activities.

ENVIRONMENTAL MITIGATION MEASURES

TCR-1: COMPENSATED CONSTRUCTION MONITORING BY OFFICIAL TRIBAL MONITOR

The project applicant is required to retain an official tribal monitor from the Wilton Rancheria to observe all ground disturbance activities to occur during the construction phase in accordance with the approved treatment plan:

1. **Communication Protocols for Monitoring:** The applicant shall develop a set of communication protocols, to the satisfaction of the County and consulting tribe to identify all points of contact and to ensure that Wilton Rancheria is notified when the applicant will proceed with authorized construction activities. Points of contact will be established for the applicant, construction supervisor, monitoring tribes, and County Archaeologist, and the contact numbers and email addresses must be documented and shared among all parties. These shall be included in the Tribal Monitoring and Discovery Treatment Plan. Points of contact are responsible for identifying backup representatives in the event they are unable to perform due to an absence or other reasons.

2. **Tribal Monitoring:** All construction-related ground-disturbing activities shall be monitored by a qualified tribal representative from Wilton Rancheria on this project to ensure that the procedures outlined in the Tribal Monitoring and Discovery Treatment Plan are addressed expeditiously and in accordance with the plan. The requirements for a monitor should be inclusive of all day and night construction activity that has the potential to result in ground disturbance. “Ground-disturbing activity” is defined herein as any activities that have the potential to disturb soil beyond that which was reasonably visible to tribal representatives and archaeologists during the pre-project pedestrian survey. This includes grading; trenching; excavation for below-ground utility installation or foundation work; and any other below-the-ground activities. Monitoring is not required for backfilling of previously excavated areas, placement of equipment into excavated areas, reseeding, or revegetation, re-grading or contouring of soil that was previously monitored, or for any aboveground project activity or construction that does not include ground disturbance, but monitors are allowed to observe upon request.

XX. UTILITIES AND SERVICE SYSTEMS

Would the project:	**Potentially Significant**	**Less than Significant with Mitigation**	**Less than Significant**	**No Impact**
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐
c. Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d. Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e. Result in substantial adverse physical impacts associated with the provision of storm water drainage facilities?	☐	☐	☒	☐
f. Result in substantial adverse physical impacts associated with the provision of electric or natural gas service?	☐	☐	☒	☐
g. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

ENVIRONMENTAL SETTING

KLG RNG PLANT

Utilities and public services for the RNG plant site/Kiefer Landfill are provided by the following entities:

- **Sewer:** Sacramento Area Sewer District (SacSewer)
- **Electricity:** Sacramento Municipal Utility District (SMUD)
- **Water Supply:** Kiefer Landfill Water District
- **Refuse & Recycling:** Sacramento County Waste Management & Recycling

- **Stormwater Management:** Sacramento County Water Resources (site is not within a designated stormwater utility district)

The Kiefer Landfill, operated by the Sacramento County Department of Waste Management & Recycling, serves as the region's primary landfill. Since 1999, the County has recovered landfill gas for renewable energy, capturing approximately 85 percent of methane generated onsite and producing about 15 megawatts per day of electricity delivered to SMUD.[110]

Overhead SMUD electrical distribution lines and communication lines are present along Kiefer Boulevard adjacent to the landfill and extend into portions of the landfill's utility corridors to support facility operations.

RNG Pipeline Alignment

Utilities and public services in the areas traversed by the longer, Option 2 alignment (Kiefer Boulevard, Sunrise Boulevard, and Douglas Road), are provided by:

- **Sewer:** SacSewer
- **Electricity:** SMUD
- **Water Supply:** Sacramento County Water Agency (SCWA)
- **Refuse & Recycling:** City of Rancho Cordova Residential Solid Waste Services
- **Stormwater Drainage:** City of Rancho Cordova Drainage Services

Existing overhead utility lines are common along the pipeline route. Along Kiefer Boulevard, overhead electrical and communication lines run parallel to the roadway, particularly near residential segments. Along Sunrise Boulevard, both overhead and underground SMUD distribution facilities exist, with overhead poles appearing intermittently in older corridor sections. Along Douglas Road, overhead electrical lines occur west of Sunrise Boulevard, where adjacent parcels remain partially undeveloped.

The Option 1 alignment is encompassed within Option 2 and would be served by the same public service and utility providers.

Storm drainage along both alignment consists of roadway swales, curb-and-gutter systems, and storm drain inlets maintained by the County or City of Rancho Cordova, depending on roadway jurisdiction.

[110] Sacramento County, Green Sacramento County: Gas-to-Energy Program, accessed January 14, 2026, from https://green.saccounty.net/Pages/GasToEnergy.aspx.

IMPACT DISCUSSION

a. *Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?*

Less Than Significant Impact. The project consists of construction and operation of a RNG facility at the existing Kiefer Landfill, potential conversion of up to two existing landfill gas engines to fire on natural gas, installation of an underground pipeline within existing public roadway corridors and private easements, and the construction of a compressor/M&R station on private property. The project would utilize existing utility service systems at the landfill, including water supply, wastewater, stormwater management, and electric service.

The RNG plant would introduce new onsite gas processing equipment, but these facilities would be located entirely within previously disturbed portions of the landfill and would not require expansion of public utility infrastructure. The pipeline would be installed below ground within the existing rights-of-way and installation would not require relocation of overhead or underground utilities, telecommunications, or construction of new off-site utility systems. Therefore, impacts would be less than significant.

b. *Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?*

Less Than Significant Impact. The RNG plant would require only minor quantities of water for ancillary domestic uses such as for restrooms or utility rooms. Water service for the RNG plant site is provided by the Kiefer Landfill Water District, and the project would continue to utilize this existing supply. The compressor station or M&R facility near the intersection of Sunrise Boulevard and Douglas Road would not require a water supply. As the project does not introduce new residential or commercial development and operational water use would be minimal, the project would not increase demand beyond the existing capacity of the landfill's water system. Therefore, adequate water supplies would be available, and impacts would be less than significant.

c. *Would the project result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*

Less Than Significant Impact. The RNG plant would generate a small amount of industrial process wastewater that would be stored on-site and transported off-site, as needed, for treatment. Condensate produced from the gas treatment process would be routed to the landfill's leachate management system, to be managed by the landfill as is occurring presently. Any minor sanitary wastewater from the nominal amount of additional workers (anticipated to be seven) would be handled through existing landfill wastewater collection, which is already served and treated by SacSewer. The volume generated would be inconsequential and would not affect system capacity. The project would not require new or expanded wastewater connections and would not generate wastewater volumes that could affect system capacity. Therefore, the project would not affect the wastewater treatment provider's ability to meet existing commitments, and impacts would be less than significant.

d. Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. Construction activities would generate temporary solid waste that would be disposed of at Kiefer Landfill. Operational solid waste would be negligible and managed onsite with existing landfill operations. Given the landfill's large, permitted capacity and existing waste-handling infrastructure, the project would not generate waste volumes that exceed local capacity, nor hinder attainment of state waste-reduction requirements. Therefore, impacts would be less than significant.

e. Would the project result in substantial adverse physical impacts associated with the provision of storm water drainage facilities?

Less Than Significant Impact. The RNG plant would be developed within an already disturbed portion of Kiefer Landfill, where stormwater drainage facilities are already in place. The project would not require construction of new regional stormwater systems. Installation of the RNG pipeline would require trenching within existing roadway rights-of-way, where drainage infrastructure such as swales, gutters, and inlets already exists. If existing drainage infrastructure was temporarily impacted by construction, it would be restored. Following backfill and repaving, drainage patterns would return to their existing condition. Any temporary impacts from construction activities, including erosion and sedimentation, would be addressed through standard BMPs and are analyzed in Section XI, Hydrology and Water Quality. Therefore, impacts would be less than significant.

f. Would the project result in substantial adverse physical impacts associated with the provision of electric or natural gas services?

Less Than Significant Impact. Electric service to the RNG plant would be provided by SMUD, which currently serves landfill operations. The project would not require relocation of off-site electrical facilities, and no new high-voltage connections would be needed. The project itself involves the expansion of onsite landfill gas processing capacity and the construction of an associated RNG pipelines and its respective compressor/M&R stations for distribution. This RNG plant would be internal to landfill operations and the distribution pipelines would connect to and effectively expand existing public natural gas distribution systems to meet existing demand. Though supplemental natural gas would be required to fuel the waste gas thermal oxidizer, fire the pilot for the off-specification gas utility flares, and potentially (depending on operational scenario) supply natural gas to up to two converted engines to produce electricity, the RNG produced by the RNG plant would far exceed the necessary amounts for these uses. Therefore, impacts would be less than significant.

g. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

No Impact. The project would comply with all applicable federal, state, and local solid waste regulations, including CALGreen Code requirements and Sacramento County solid waste ordinances. Kiefer Landfill itself is a regulated waste management facility, and all solid waste generated during construction and operation would be handled in compliance with these regulatory programs. Therefore, implementation of the project would not conflict with or obstruct solid waste regulations, and no impacts would occur.

Environmental Mitigation Measures

None recommended.

XXI. Wildfire

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	**Potentially Significant**	**Less than Significant with Mitigation**	**Less than Significant**	**No Impact**
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts on the environment?	☐	☐	☐	☒
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

Environmental Setting

Urban and rural fires may occur within Sacramento County, although the risk is less for major wildland fires due to the relatively flat topography and policies that limit urbanization of wild land areas. Areas along the American River Parkway and grasslands in the east portion of the County are vulnerable. Fire protection for the RNG plant site is managed by CAL FIRE and fire protection for the RNG pipeline options is provided by the Sacramento Metropolitan Fire District (see Section XVI. Public Services for further discussion).

The RNG Plant site/Kiefer Landfill is located within a SRA and is designated as a "Moderate" FHSZ.[111] CAL FIRE has a legal responsibility to provide fire protection on all SRA lands, which are defined based on land ownership, population density, and land use.[112]

Option 1 and 2 pipeline alignment options and proposed base-case and alternate compressor/M&R station are located within or immediately adjacent to a Local Responsibility

[111] Metro Fire Sacramento, Fire Hazard Severity Zones Online Map, accessed January 14, 2026, from https://metrofire.ca.gov/fire-hazard-severity-zones.

[112] California Open Data Portal, California State Responsibility Areas, accessed January 28, 2026, from https://data.ca.gov/dataset/california-state-responsibility-areas#:~:text=CAL%20FIRE%20has%20a%20legal,population%20density%20and%20land%20use.

Area (LRA) for Sacramento County and are within a "Moderate FHSZ." A small portion of the proposed pipeline would be located within a SRA where it connects to the RNG plant.

Regulatory Setting

State

California Department of Forestry and Fire Protection

CAL FIRE creates FHSZ maps for areas within the SRA and prepares recommended FHSZ maps for areas within the LRA for local agencies. Hazard ratings range from Moderate to Very High and are based on the physical conditions that create the likelihood that an area will burn over a 30 to 50-year period.

Local

Sacramento County General Plan Safety Element

The Safety Element of the County's General Plan states that California State law requires that cities and counties address the risk of fire for land classified as SRA and land classified as Very High FHSZ within their safety elements (Government Code § 65302(g)(3)). The SRA is the area in which the State is financially responsible for the prevention and suppression of wildfires; it does not include lands within city boundaries or in federal ownership. Alternatively, the Local Responsibility Area is the area in which local governments or fire districts, rather than the State, are responsible for fire prevention and suppression. Sacramento County contains 119,248 acres of land that CAL FIRE is responsible for; this area is divided into CAL FIRE Battalion 1 and Battalion 4.

City of Rancho Cordova General Plan Safety Element

The City of Rancho Cordova General Plan Safety Element identifies viable solutions to minimize the potential risk of death, injuries, property damage, and economic hardship and social displacement resulting from fires, floods, earthquakes, landslides, and other hazards. In addition to fire related hazards from structures in urbanized areas, the main source of wildland fire in the City's Planning Area occurs where natural resource and habitat areas interface with urbanized development (e.g., along the American River Parkway and northern boundary of the Planning Area). Additionally, several of the new and proposed developments in the Planning Area contain large wetland preserves with natural vegetation, which have the potential to ignite and pose safety risks to adjacent and surrounding developments.[113] The following goal, policy, and actions of the Safety Element applicable to the proposed project are as follows:

- **Goal S.9** – Reduce the probability of fire damage to all of the City's structures.
    - **Policy S.9.1** – Cooperate with the Sacramento Metropolitan Fire District (SMFD) to reduce fire hazards, assist in fire suppression, and ensure efficient emergency medical response.

[113] City of Rancho Cordova. (2022). General Plan Safety Element. Accessed May 29, 2026 from https://www.cityofranchocordova.org/departments/community-development/planning/planning-division-document-library.

- **Action S.9.1.2:** Continue to review projects for compliance with the Fire Code as part of the building permit process.

- **Action S.9.1.4:** Require on-site fire suppression systems for new commercial and industrial development, as well as multi-family residential development with five or more units, to reduce the dependence on fire department equipment and personnel.

- **Action S.9.1.7:** Continue to enforce all existing codes and ordinances regarding fire protection, including building inspection and vegetation management.

IMPACT DISCUSSION

a. Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. Neither the RNG plant nor the pipeline alignment options and associated compressor/M&R station options would be within a High or Very High FHSZ. Additionally, project construction would not require the complete closure of any public or private streets or roadways during construction. Temporary construction activities would not impede use of roadways for emergencies or access for emergency response vehicles as roadways would remain open and passible during construction, and any disruptions would be short-term and would not physically interfere with emergency evacuation plans. In addition, the project would be required to comply with Sacramento Metropolitan Fire District development requirements concerning emergency access and circulation. Therefore, the project would not substantially impair an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

b. Would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Less Than Significant Impact. The overall project vicinity is flat and does not support areas of steep slopes that could accelerate wildfire spread or contribute to rapid fire behavior. In addition, the RNG plant site is located within a rural area that lacks substantial tree canopy, which would support sustained wildfire ignition or propagation. The risk of wildland fire is decreased in more urbanized areas of the project footprint where more tree canopy is present, due to urban development patterns including maintained landscaping, paved surfaces, fuel breaks associated with roadways, and active vegetation management. The project itself would not include components or operations that would exacerbate wildfire risk, such as activities involving substantial ignition sources, large-scale vegetation clearing, or the storage of highly combustible materials. As such, the project would not be located in a critical fire danger zone or adjacent to wildlands subject to wildfires. There would be an unchanged level of fire protection provided to the project area. In addition, the project would adhere to building codes and any conditions included through review by the Sacramento Metropolitan Fire District. Therefore, impacts would be less than significant.

c. Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts on the environment?

No Impact. The RNG plant, pipeline, and compressor/M&R stations would connect to existing electricity, water, and other utilities necessary to serve the site. Specifications for project infrastructure improvements would be subject to County requirements and review as well as Sacramento Metropolitan Fire District plan check as required for issuance of a building permit to ensure compliance with the applicable fire and life safety regulations, codes, and ordinances. The project also does not include components such as roads, fuel breaks, emergency water sources, or overhead power lines that could exacerbate fire risk or that may result in temporary or ongoing impacts on the environment. Therefore, no impacts would occur.

d. Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. The RNG plant site and a portion of Option 1 of the RNG pipeline is within a rural area on a previously disturbed parcel containing Kiefer Landfill. In addition, the other portion of Option 1 of the RNG pipeline, a majority of the proposed pipeline alignment Option 2 as well as the base-case and alternate compressor/M&R station options would be located in the city of Rancho Cordova. The overall project vicinity is generally flat and not within a Very High or High FHSZ. In addition, the project does not include any features that would exacerbate the risks of wildfire. Therefore, the project would not result in exposure of people or structures to significant risks from flooding or landslides following a wildfire, and no impact would occur.

Environmental Mitigation Measures

None recommended.

XXII. Mandatory Findings of Significance

	Potentially Significant	Less than Significant with Mitigation	Less than Significant	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐

b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☐	☒	☐	☐
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

IMPACT DISCUSSION

a. *Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?*

Less Than Significant With Mitigation. As discussed in Section V. (Biological Resources), potential impacts were identified to riparian and aquatic habitats, sensitive plant and wildlife species, and nesting migratory birds. The proposed project would be required to implement Mitigation Measure BIO-1, Project Coverage under SSHCP, and all applicable AMMs from the SSHCP to ensure that the project complies with the SSHCP to support conservation of biological resources. The project would also implement Mitigation Measures BIO-2 through BIO-5 and BIO-8 to protect special-species including rare plants, Crotch's bumble bee, monarch butterflies, ~~and~~ burrowing owls, and western spadefoot toad. Implementation of Mitigation Measures BIO-6 and BIO-7 would protect nesting bird, including raptor, populations to ensure they remain undisturbed during project activities. With adherence to the listed mitigation measures, the project would not have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or substantially reduce the number or restrict the range of a rare or endangered plant or animal. As discussed in Section VI. (Cultural Resources), the project would not have the potential to eliminate important examples of the major periods of California history or prehistory. However, in the event of an unanticipated discovery of archaeological resources or human remains, implementation of Mitigation Measures CUL-1 and CUL-2 would ensure impacts to cultural resources would be less than significant.

b. *Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)*

Less Than Significant with Mitigation. A significant environmental impact could result from the combined effects of two or more projects that are closely related geographically (i.e., within the same vicinity or greater region, depending on the nature and scope of the project and environmental factor under consideration) and in time (i.e., recently completed

projects, projects currently under construction, and/or projects anticipated to be implemented in the near-term future). In general, the effects of a proposed project when combined with the effects of past projects (other than recently completed projects) are accounted for in the baseline conditions under CEQA for the analysis of the proposed project's environmental impacts.

The analysis of the combined impacts of more than one project allows decision makers to consider the potential consequences of a project in a broader environmental context rather than in isolation. This is necessary because a significant combined impact could result even when the individual impacts of related projects are less than significant. The combined effects of several related projects with impacts that are less than significant may also be determined to be less than significant on a cumulative basis. In addition, even if the combined effects of several related projects are determined to be significant, an individual project's incremental contribution to those significant combined effects may be determined to be less than cumulatively considerable and therefore less than significant.

There are several projects currently under construction, proposed, or planned within the broader region, as described below.[114]

- **Legado Specific Plan** (NOP submitted November 2025): Large-scale, mixed-use, mixed-density master planned community in the City of Rancho Cordova. Although no environmental analyses have been completed for the Legado Specific Plan Project at the time of the preparation of this IS/MND, the Project Site would overlap with the proposed project along Kiefer Boulevard east of Rancho Cordova Parkway. Specific timing for construction and expected operational dates have not been detailed.

- **Steelridge/Trevor Gilmartin** (Permit issued April 2026): Tentative Subdivision Map and Specific Plan under the Suncreek Specific Plan approved in 2013 on the Northeast Corner of Rancho Cordova Parkway and Kiefer Boulevard for the creation of 26 large lots and subdivision of 240 acres into 853 parcels.

- **Shalako East** (Submitted February 2026): Tentative Subdivision Map for 628 surface lots of various sizes as well as a school, park, sewer lift station, low impact development basin, and landscaper lots. There is currently no estimated date for construction.

- **Shalako West** (Submitted February 2026): The project was originally approved under a Tentative Map in July 2022, including a Small Lot Tentative Subdivision Map for 364 single-family residential units and associated infrastructure, open space, and amenities on the west side of the Shalako property, as well as increasing the subdivision to 366 units and a minor amendment to the Suncreek Specific Plan to raise allowable units from 1,150 to 1,170 within the project area and from 4,628 to 4,648 overall. A first amendment subsequently revised the Large Lot Tentative Subdivision Map by modifying and subdividing parcels 8, 10, and 15 and adding parcels 39 and 40. An Amended Tentative Map is now under review, and the most recent addendum proposes removal of the previously planned detention basin at the southeast corner of the site. There is currently no estimated date for construction.

[114] City of Rancho Cordova. 2026. County communication with the City of Rancho Cordova on the Status of Projects Along KLG Utilization Project.

- **Asteria Flats** (Entitlement approved): The project is located South of Crysanthy Boulevard and east of Sunrise Boulevard. The project site is 11.7 acres and would involve the construction of 236 affordable apartment units with amenities, parking, and landscaping. There is currently no estimated date for construction.

- **Douglas LLC TSM, DR** (Entitlements in review): The project includes a Tentative Subdivision Map and Major Design Review for a 4.91 acre parcel zoned for General Commercial consisting of eight 6,000 square foot structures for General Commercial use; Retail Service and Office; Wholesale and Small Manufacturing. The map would split the parcel into eight so that each building would have its own parcel.

- **Brighton Village** (Entitlement approved in 2023): The project has not been built; entitlement will expire this August. The project would develop a vacant site with 138 two family dwelling units and a 34-unit multifamily apartment complex.

- **Antolia Marketplace** (Approved March 2022): The marketplace, located on the southeast corner of Douglas Boulevard and Sunrise Boulevard. The shopping center has been built under various entitlements and includes a Chevron, McDonalds, and Dutch Bros.

- **Autozone** (Approved February 2022): Project is currently under construction and is the last vacant pad of the Sunridge Shopping Center. Currently no confirmed completion date.

These projects include large scale, mixed use developments, subdivisions with public services and infrastructure, housing, and commercial developments and are intended to accommodate regional growth. The proposed project differs in scale, purpose, and impact characteristics from these projects. The proposed project consists of constructing an RNG plant and associated pipelines for distribution located primarily within the footprint of an existing landfill and along established roadway corridors.

As evaluated in this IS/MND, the proposed project would not induce population growth or additional energy demands, would not facilitate additional development, and would generate minimal operational traffic and service demands. Though construction timelines for the related projects are uncertain, the proposed project anticipates a construction start in January 2027, with a duration of approximately 14 months. Project-related impacts (e.g., air quality, biological resources, cultural resources, greenhouse gas emissions, and noise) would occur primarily during construction, would be temporary in nature, and would be mitigated to less than significant levels. Further, impacts related to Aesthetics, Agriculture and Forestry Resources, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Population and Housing, Public Services, Transportation, Utilities and Service Systems, and Wildfire were determined to be less than significant without the need for mitigation measures. The proposed project would have no impact in relation to Airports, Land Use and Planning, Mineral Resources, and Recreation, and thus, would not have the potential to contribute to a significant effect created by the combined impacts of closely related projects for these factors.

As such, the proposed project would not induce population growth, alter regional development patterns, or result in long term or regionally substantial emissions. In addition, the project would not degrade biological or cultural resources beyond localized and mitigated effects. Therefore, the project would not meaningfully contribute to the cumulative

impacts of other planned or pending projects in the region. Accordingly, the proposed project's incremental contribution to cumulative effects would not be cumulatively considerable, and impacts would be less than significant.

c. *Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?*

Less Than Significant with Mitigation. Numerous factors discussed in the environmental impact analyses presented throughout the Environmental Checklist section pertain to the quality of the human environment. Based on the analysis contained in the IS/MND, the environmental impacts created by the proposed project in relation to most of these factors would be absent or less than significant.

As discussed in Section I (Aesthetics), although the project is primarily in a nonurbanized area, construction could cause short-term visual impacts visible to nearby neighborhoods. The proposed RNG plant may also introduce lighting consistent with existing sources, resulting in less-than-significant impacts. As discussed in Section IV (Air Quality), the project would result in emissions during construction of the project. However, Mitigation Measure AQ-1 would be implemented and would reduce impacts to less than significant. Additionally, Mitigation Measure AQ-2 has been included at the request of SMAQMD to reduce off-road equipment exhaust-related emissions during construction. As discussed in Section V (Biological Resources), the project would result in biological impacts during pipeline construction for the project. However, Mitigation Measures BIO-1 through BIO-~~7~~8 would be implemented and would reduce impacts to less than significant. As discussed in Section VI (Cultural Resources), Section VIII (Geology and Soils), and Section XIX (Tribal Cultural Resources), there is potential for impacts to cultural, paleontological, and tribal cultural resources along the pipeline route. The implementation of Mitigation Measures CUL-1 and CUL-2, GEO-1, and TCR-1 would reduce impacts to less than significant. As discussed in Section X (Hazards and Hazardous Materials), RNG plant construction would involve temporary use and handling of hazardous materials in compliance with federal, state, and local regulations and would result in less-than-significant impacts. Temporary lane closures would also occur but would not interfere with emergency operations. Additionally, as discussed in Section XIV (Noise), there is potential for the project to generate noise in exceedance of County policy. However, implementation of Mitigation Measure N-1 would reduce impacts to less than significant. Lastly, as discussed in Section XXI (Wildfire), although the project is located in an unurbanized area with higher wildfire risk, it would not include components that would increase that risk allowing for less-than-significant impacts. With the incorporation of these mitigation measures, the proposed project would not have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly. Impacts would be less than significant with mitigation incorporated.

ENVIRONMENTAL MITIGATION MEASURES

Mitigation Measures ensure that identified significant impacts of the project are reduced to a level of less than significant. Pursuant to Section 15074.1(b) of the CEQA Guidelines, each of these measures must be adopted exactly as written unless both of the following occur: (1) A public hearing is held on the proposed changes; (2) The hearing body adopts a written finding that the new measure is equivalent or more effective in mitigating or avoiding potential significant effects and that it in itself will not cause any potentially significant effect on the environment.

IV. AIR QUALITY

AQ-1: REDUCE CONSTRUCTION-GENERATED FUGITIVE DUST AND EXHAUST

Construction contractors must implement the measures listed below to reduce construction-generated fugitive dust. Control of fugitive dust is required per SMAQMD Rule 403 and enforced by SMAQMD staff. The list of required measures was informed by SMAQMD's basic ~~and enhanced~~ construction emission control practices.

- Water all exposed surfaces two times. Exposed surfaces include, but are not limited to soil piles, graded areas, unpaved parking areas, staging areas, and access roads.
- Cover or maintain at least 2 feet of free board space on haul trucks transporting soil, sand, or other loose material on the site. Any haul trucks that would be traveling along freeways or major roadways should be covered.
- Use wet power vacuum street sweepers to remove any visible track out mud or dirt onto adjacent public roads at least once a day. Use of dry power sweeping is prohibited.
- Limit vehicle speeds on unpaved roads to 15 miles per hour.
- All roadways, driveways, sidewalks, parking lots to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used.
- Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes (California Code of Regulations [CCR], Title 13, Sections 2449[d][3] and 2485). Provide clear signage that posts this requirement for workers at the entrances to the site.
- Provide current certificate(s) of compliance with CARB's In-Use Off-Road Diesel-Fueled Fleets Regulation (CCR, Title 13, Sections 2449 and 2449.1).
- Maintain all construction equipment in proper working condition, according to manufacturer's specifications. The equipment must be checked by a certified mechanic and determined to be running in proper condition before it is operated.

AQ-2: REDUCE OFF-ROAD EQUIPMENT EXHAUST-RELATED EMISSIONS DURING CONSTRUCTION

For construction activities within the project area, including the compressor station site and renewable natural gas pipeline, construction contractor(s) shall ensure that off-road diesel-fueled equipment with engines larger than 50 horsepower shall meet or exceed CARB Tier 4 Final emissions standards.

An exemption from these requirements may be granted by the County if the construction contractor(s) submits documents to the County demonstrating that equipment with the required tier is not reasonably available. Before an exemption may be considered by the County, construction contractor(s) shall be required to demonstrate that two construction fleet owners/operators in Sacramento County were contacted and that those owners/operators confirmed Tier 4 final equipment could not be located within Sacramento County.

V. BIOLOGICAL RESOURCES

BIO-1: PROJECT COVERAGE UNDER SSHCP

The project proponent shall obtain coverage for the project under the SSHCP with a signed SSHCP authorization form. This shall include submittal of all required application materials per SSHCP Section 10.4.2 and payment of all applicable fees consistent with current SSHCP requirements to mitigate for impacts to species and habitat prior to construction. All applicable fees shall be paid prior to ~~the issuance of a grading permit~~ ground disturbing activities for the project. If a grading permit is not required, fee payment agreement shall be fully executed prior to issuance of the project's building permit. As part of the SSHCP authorization, impacts to land cover types would be evaluated. Impacts to Vernal Pool Fairy Shrimp, Midvalley Fairy Shrimp, and Vernal Pool Tadpole Shrimp are covered under the mitigation for impacts to Vernal Pools. Implementation of the Project will be required to comply with all applicable AMMs from the SSHCP to avoid and/or minimize impacts on habitat and special-status species that have a moderate or high potential to be located on or near the project site, including Swainson's Hawk, Tricolored Blackbird, Burrowing Owl (with the exception of AMM WBO-5), Western Spadefoot Toad, and Western Pond Turtle.

BIO-2: PRE-CONSTRUCTION RARE PLANTS SURVEY

Prior to ground disturbing activities, a pre-construction plant survey shall be performed during the appropriate blooming period for special status plant species that are not covered by the SSHCP with moderate to high potential of occurrence, Valley Brodiaea and Spicate Calycadenia, that may be impacted by construction activities. The surveys will be conducted in accordance with Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities,[115] or the most current protocols, specifically with respect to the number and timing of surveys, use of reference populations, and evaluation of negative findings. Results of the survey(s) will be submitted to Sacramento County Planning and Environmental Review. If the survey results are negative, no further action, and avoidance and minimization measures, is needed. If the survey finds that any special-status plant species are present, the survey report will include the location and description of all work areas, the location

[115] California Department of Fish and Wildlife. (2018). Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities. March 20. Available at: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959

and description of all occupied habitat for special-status plant species, and identification of locations where effective avoidance measures could be implemented. The appropriate avoidance / protective measures shall be determined in coordination with the Environmental Coordinator and CDFW.

BIO-3: CROTCH'S BUMBLE BEE AVOIDANCE

Initial ground-disturbing work (e.g., grading, vegetation removal, staging) shall take place between August 15 and March 15, if feasible, to avoid impacts on nesting Crotch's bumble bees.

Regardless of the feasibility of the above limited operating period, a qualified biologist familiar with bumble bees of California and experienced using survey methods for bumble bees shall conduct a ~~habitat assessment and focused survey~~ Protocol Survey for Crotch's bumble bee before the start of any ground-disturbing activities. Surveys shall be performed when Crotch's bumble bee is most likely to be identified, typically from ~~April through August~~ March 1 through October 31 (i.e., the colony active period) when floral resources and ideal weather conditions are present, and shall follow the methods in Survey Considerations for CESA Candidate Bumble Bee Species.[116] Surveys shall be conducted during the colony active period closest to the start of planned construction activities. Survey results shall be submitted to the project applicant and Sacramento County no less than 7 days before construction begins.

- Crotch's Bumble Bee Protocol Survey. If Project activities are proposed to occur during the active season for CBB, Project Proponent shall develop a Pre-Construction Survey Plan for CBB and submit it to Sacramento County for acceptance, developed in coordination with CDFW (see https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150&inline). A total of three surveys shall be conducted prior to any ground-disturbing project activities or vegetation removal that will take place during the active season for CBB (March 1 through October 31), or until all flowering vegetation is largely desiccated, to determine if any active nests are within the project area. Each survey shall be spaced two to four weeks apart, unless otherwise authorized in writing by Sacramento County in coordination with CDFW, with the last survey taking place within 72 hours prior to construction activity. A Qualified Biologist shall perform meandering transects through the planned construction footprint, plus a 50-foot buffer where accessible, between 9:00 am and 1:00 pm where feasible and at least one hour after sunrise and at least two hours before sunset, to visually survey the area for CBB activity. The duration of the survey will be the minimum amount of time necessary to adequately survey the area, typically at least one hour of surveying per three acres of potential habitat, excluding capture, chilling, photo, identification, and release time. For each sampling event, the Qualified Biologist shall survey suitable habitat using non-lethal photo voucher and netting methods, developed in coordination with CDFW (see https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150&inline). If a suspected or confirmed CBB is identified during any of these surveys, the Qualified Biologist shall notify Sacramento County within 48 hours.

  If only foraging CBB or CBB nests are observed, a no-disturbance buffer of at least 50 feet from plants CBB have been identified as foraging from shall be established and the

[116] California Department of Fish and Wildlife. (2023). Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species. June 6. Available at: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150

project proponent shall consult with Sacramento County and CDFW to demonstrate compliance with CESA.

- ~~The project applicant shall submit a survey report to CDFW within 1 month of survey completion and shall notify CDFW and Sacramento County within 24 hours if Crotch's bumble bees are detected.~~

- ~~If Crotch's bumble bees are detected during the focused survey, appropriate avoidance measures shall be implemented. Avoidance measures shall include, but not be limited to, the following:~~

  - ~~Protective buffers shall be implemented around active nesting colonies until these sites are no longer active. A qualified biologist, in coordination with CDFW, shall determine the appropriate buffer size to protect nesting colonies; however, the buffer shall be a minimum of 50 feet.~~

  - If impacts on Crotch's bumble bee cannot be avoided, project applicant shall obtain an ITP from CDFW and shall implement all avoidance measures included in the ITP.

  - If Crotch's bumble bee is added to the SSHCP as a covered species at a later date, any AMMs associated with this species shall supersede these measures. If Crotch's bumble bee is added to the SSHCP CDFW ITP at a later date, the project applicant shall obtain incidental take coverage for this species through participation in the SSHCP.

BIO-4: MONARCH BUTTERFLY AVOIDANCE

The following measures will be required to protect monarch butterflies prior to ESA (and, if applicable, CESA) listing. In the event monarch butterfly is ESA- and/or CESA-listed at the time of project construction, monarch butterfly protection requirements will instead adhere to the protocol(s) adopted by the listing agency/agencies (CDFW and/or USFWS).

- No more than two days prior to the initiation of vegetation trimming or removal for construction, the project proponent shall ensure that a qualified biologist approved by the County of Sacramento surveys all areas of potentially suitable habitat in the project area for monarch butterfly larval host plants.

- If host plants are found, the biologist shall survey all host plants for monarch eggs, larvae, and pupae. If no eggs, larvae, or pupae are found, plants may be removed within two days.

- If eggs, larvae, or pupae are present, host plants shall be protected in place until the biologist has determined that no more eggs, larvae, or pupae are present.

BIO-5: BURROWING OWL

On October 10, 2024, the California Fish and Game Commission accepted a petition to list western burrowing owl under CESA and designated the species as a candidate species. Pursuant to CESA, take of candidate species is prohibited. While western burrowing owl is a covered species under the SSHCP, the plan's CDFW 2081 Incidental Take Permit (ITP) does not include take coverage for the species. Pursuant to the SSHCP, the potential listing of

western burrowing owl under CESA would be considered a changed circumstance that will trigger review by the SSHCP Technical Advisory Committee and an eventual amendment that will likely result in a change to the SSHCP, and addition of western burrowing owl to the SSHCP CDFW 2081 ITP.

In the interim period during which take coverage for western burrowing owl is not available through participation in the SSHCP, to avoid take of burrowing owl, the project applicant shall implement the following:

~~1. Burrowing Owl Surveys. Project proponent shall conduct a burrowing owl survey over all suitable habitat present within Project area. Burrowing owl surveys shall be conducted by a qualified biologist in accordance with the protocol described in the Staff Report on Burrowing Owl Mitigation (CDFW, March 7, 2012). If possible, surveys should be conducted during both the breeding (February 1 – August 31) and non-breeding seasons (September 1 – January 31) immediately preceding the planned start of construction activities to ascertain the seasonal residency status of any owls occupying the site. The presence of burrowing owl or their sign anywhere on the site or within a 500-foot accessible radius around the project site shall be recorded and mapped. Surveys shall disclose all burrows and occurrence of sign of burrowing owl on the project site and within the 500-foot buffer. Results of the survey shall be submitted to the County.~~

1. **Burrowing Owl Surveys.** Prior to beginning ground-disturbing project activities, a Qualified Biologist shall conduct at least four surveys using the methods described in most recent guidelines from CDFW's *Staff Report on Burrowing Owl Mitigation*, *Appendix D* (2012). Surveys shall be conducted during the breeding season (February 1 to August 31) and include no fewer than four survey visits: at least one site visit between February 15 and April 15 and a minimum of three survey visits, at least three weeks apart, between April 15 and July 15, with at least one visit after June 15. Surveys shall also be conducted during the non-breeding season (September 1 to January 31) before the start of construction activities to determine seasonal residency. Nonbreeding season surveys shall consist of at least four visits, spread evenly, throughout the nonbreeding season. The presence of BUOW individuals, burrow complexes, or their sign (e.g., molted feathers, cast pellets, prey remains, eggshell fragments, owl whitewash, nest burrow decoration materials, etc.) anywhere onsite or within a 1,650-foot accessible radius around the project Area shall be recorded and mapped. The Qualified Biologist shall submit the results of the survey to Sacramento County prior to beginning project activities. If changes in BUOW presence are detected (e.g., BUOW have moved onsite or changed burrow use), the Qualified Biologist shall contact Sacramento County by phone or email within 24 hours of the observation to consult on appropriate measures to avoid impacts of the project to BUOW and the Qualified Biologist shall establish no-disturbance buffers. The Qualified Biologist could modify the nest buffer with written approval from Sacramento County in coordination with CDFW.

2. **Burrowing Owl Take Avoidance.** During the breeding season (February 1 to August 31), surveys shall document whether burrowing owl are nesting in or within ~~500~~ 1,650 feet of the project area. During the non-breeding season (September 1 to January 31), surveys shall document whether burrowing owl are using habitat in or directly adjacent to any area to be disturbed. Survey results shall only be valid for the season (breeding or non-breeding) during which the survey was conducted. If a lapse in project-related work of fifteen (15) calendar days or longer occurs, another focused survey and consultation

with the County and CDFW shall be required before project work can be reinitiated. If a burrowing owl or evidence of presence at or near a burrow entrance is found to occur within ~~500~~ 1,650 feet of the project site, the following measures shall be implemented:

- If burrowing owl are found during the non-breeding season (approximately September 1 to January 31), the ~~project applicant~~ qualified biologist shall establish a ~~minimum 160-foot (50-meter)~~ no-disturbance buffer zone around active burrows. The buffer zone shall be flagged or otherwise clearly marked. Measures such as visual screens may be used to further reduce the buffer with CDFW approval and provided a qualified biologist confirms that such measures do not cause agitated behavior.

- If burrowing owl are found during the breeding season (approximately February 1 to August 31), the project applicant shall:

    - Avoid all nest sites that could be disturbed by project construction during the remainder of the breeding season or while the nest is occupied by adults or young (occupation includes individuals or family groups foraging on or near the site following fledging).

    - Establish a minimum ~~500~~ 1,650-foot non-disturbance buffer zone around nests, unless otherwise approved by the County in writing, in consultation with CDFW. The buffer zone shall be flagged or otherwise clearly marked. Should construction activities cause the nesting bird to vocalize, make defensive flights at intruders, or otherwise display agitated behavior, then the exclusionary buffer will be increased such that activities are far enough from the nest so that the bird(s) no longer display this agitated behavior. Construction shall only occur within the 500-foot buffer zone during the breeding season if a qualified biologist monitors the nest and determines that the activities do not disturb nesting behavior, or the birds have not begun egg-laying and incubation, or that the juveniles from the occupied burrows have fledged and moved off site. Any modifications to this buffer shall be approved by the County, in consultation with CDFW prior to its implementation. The buffer reduction request shall include relevant information and/or propose new measures to justify the buffer reduction. The buffer area must be clearly marked to prevent project-related activities from occurring within the buffer zone.

3. **Eviction of Burrowing Owls. If after all applicable avoidance and minimization** measures are implemented and Project proponent needs to evict burrowing owl, an ITP shall be obtained for the activity and a burrowing owl eviction plan shall be developed by a qualified biologist for the County's review and approval, in consultation with CDFW. This plan, including its proposed mitigation, shall be consistent with the most recent available guidelines (e.g., 2012 Staff Report on Burrowing Owl Mitigation[117]). Burrow eviction shall only be conducted during the non-breeding season for burrows located in the project footprint, and in limited instances within a buffer zone around the project site, as determined by the County in consultation with CDFW after all avoidance and minimization measures have been exhausted.

[117] California Department of Fish and Wildlife. (2012). Staff Report on Burrowing Owl Mitigation. March 7. Available at: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83843&inline=true

BIO-6: NESTING BIRD PROTECTION

PRECONSTRUCTION SURVEYS FOR MIGRATORY AND NON-RAPTOR NESTING BIRDS

Adequate measures shall be taken to avoid inadvertent take of migratory bird nests when in active use. This shall be accomplished by taking the following steps:

- If construction is proposed during the nesting season (February 1 to September 15, inclusive), a survey for nesting birds shall be conducted by a qualified biologist within seven days prior to the onset of ground disturbing activities to identify any active nests (i.e., nests containing eggs and/or young) of migratory and/or non-raptor bird species. Surveys will be performed for the project site, vehicle and equipment staging areas, and suitable habitat within 500 feet for all migratory and/or non-raptor nesting birds of the project site to locate any active migratory bird nests. If project related work does not commence within seven days, or if there is a lapse in construction activities totaling seven days or more, additional surveys will be required.

- If no active nests are identified during the survey period, or if development is initiated during the non-breeding season, construction may proceed with no restrictions.

- If active nests are found, an adequate no-disturbance buffer shall be established around the nest location and construction activities shall be restricted within the buffer until a qualified biologist has confirmed that any young birds have fledged and are able to leave the construction area. Required setback distances for the no-disturbance buffer will be established by the qualified biologist and may vary depending on the species, line-of-sight between the nest, and the construction activity, and the birds' sensitivity to disturbance. As necessary, the no-disturbance zone will be fenced with temporary orange construction fencing, high visibility rope, or a similar visual barrier if construction is to be initiated on the remainder of the development site. The buffer shall be kept in place until after the breeding nesting season or until a qualified biologist confirms the young have fledges, are foraging independently, and the nest is no longer active for the season.

- Any birds that begin nesting within the project site and survey buffers during construction activities will be assumed to be habituated to construction-related or similar noise and disturbance levels and no-disturbance zones shall not be established around active nests in these cases; however, should birds nesting within the project site and survey buffers during construction activities begin to show disturbance associated with construction activities, no-disturbance buffers shall be established as determined by the qualified wildlife biologist.

- A report of findings will be prepared by the qualified biologist and submitted to the County for review and approval prior to initiation of construction within the no-disturbance zone during the nesting season. The report will either confirm absence of any active nests or will confirm that any young within a designated no-disturbance zone have fledged and construction can proceed.

BIO-7: RAPTOR NEST PROTECTION

Adequate measures shall be taken to avoid inadvertent take of raptor nests when in active use. This shall be accomplished by taking the following steps.

- If construction is proposed during the nesting season (February 1st to September 15th, inclusive), a survey for nesting raptors shall be conducted by a qualified biologist within seven (7) days prior to the onset of vegetation removal, building demolition, or construction, to identify any active nests (i.e., nests containing eggs and/or young) of raptor bird species. Surveys shall be performed for the project site, vehicle and equipment staging areas, and suitable habitat within one half mile of the project site that can be accessed by the project proponent to locate any active raptor (bird of prey) nests. If project related work does not commence within seven (7) days or if there is a lapse in construction activities totaling seven (7) days or more, additional surveys will be required.

- If no active nests are identified during the survey period, or if development is initiated during the non-breeding season construction may proceed with no restrictions.

- If active raptor nests are found, an adequate no-disturbance buffer shall be established around the nest location and construction activities shall be restricted within the buffer until a qualified biologist has confirmed that any young birds have fledged and are able to leave the construction area. Required setback distances for the no-disturbance zone shall be established by the qualified biologist and may vary depending on species, line-of-sight between the nest, and the construction activity, and the birds' sensitivity to disturbance. As necessary, the no-disturbance zone shall be fenced with temporary orange construction fencing, high visibility rope, or a similar visual barrier if construction is to be initiated on the remainder of the development site. The buffer shall be kept in place until after the breeding nesting season or a qualified biologist confirms the young have fledged, are foraging independently, and the nest is no longer active for the season.

- In the event that raptors begin nesting within the project site amid construction activities, an adequate no-disturbance buffer shall be established around the new nest location until a qualified biologist has confirmed that any young birds have fledged and are able to leave the construction area.

- All identified active raptor nests that may be subject to project related impacts shall be regularly monitored by a qualified biologist for any changes in behavior related to construction disturbance. If the qualified biologist observes that nesting raptors are disturbed by project related construction activities, all work activities shall cease until the qualified biologist identifies a revised no-disturbance zone.

- A report of findings shall be prepared by the qualified biologist and submitted to the County for review and approval prior to initiation of construction within the no-disturbance zone during the nesting season. The report shall either confirm absence of any active nests or shall confirm that any young within a designated no-disturbance zone and construction can proceed.

BIO-8: WESTERN SPADEFOOT AVOIDANCE

The California Fish and Game Commission received a petition on September 24, 2025, to list the western spadefoot as a candidate species under CESA and designated the species as a candidate species. Pursuant to CESA, take of candidate species is prohibited. While western spadefoot is a covered species under the SSHCP, the plan's CDFW 2081 Incidental Take Permit (ITP) does not include take coverage for the species. Pursuant to the SSHCP, the potential listing of western spadefoot under CESA would be considered a changed circumstance that will trigger review by the SSHCP Technical Advisory Committee and an eventual amendment that will likely result in a change to the SSHCP, and addition of western spadefoot to the SSHCP CDFW 2081 ITP.

In the interim period during which take coverage for western spadefoot is not available through participation in the SSHCP, to avoid take of western spadefoot, the project applicant shall implement the following:

1. Habitat Evaluation and Delineation. Prior to initiating Project activities, a Qualified Biologist shall conduct a winter larval survey within the project area footprint. If the evaluation concludes that larval forms of the Western Spadefoot are present within the project area footprint, Sacramento County shall be consulted in coordination with CDFW and USFWS.

2. The project applicant shall minimize, to the extent feasible, permanent or temporary, fixed, exterior lighting, including motion-triggered security lighting that casts light on western spadefoot habitat beyond the Project Area between sunset and sunrise. Nighttime construction lighting shall be shielded and oriented downward to minimize effects on any nearby western spadefoot habitat.

VI. CULTURAL RESOURCES

CUL-1: UNANTICIPATED DISCOVERY OF CULTURAL RESOURCES

In the event of an inadvertent discovery of cultural resources (excluding human remains) during construction, all work must halt within a 100-foot radius of the discovery. A qualified professional archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for indigenous and historic archaeology shall be retained at the Contractor's expense to evaluate the significance of the find. If an unanticipated discovery is determined to be a tribal cultural resource (TCR), the contractor shall defer to the standards and protocols to the consulting tribe.

1. Work cannot continue within the 100-foot radius of the discovery site until the archaeologist and/or tribal monitor conducts sufficient research and data collection to decide that the resource is either 1) not cultural in origin; or 2) not potentially eligible for listing on the National Register of Historic Places (NRHP) or California Register of Historical Resources (CRHR).

2. If a potentially eligible resource is encountered, then the archaeologist and/or tribal monitor, Planning and Environmental Review staff, and contractor shall arrange for the following: 1) total avoidance of the resource, if possible; 2) assessed for eligibility for listing in the NRHP/CRHR 3) test excavations or total data recovery as mitigation. The determination shall be formally documented in writing and submitted to the County Environmental Coordinator as verification that the provisions of CEQA for managing unanticipated discoveries have been met.

CUL-2: UNANTICIPATED DISCOVERY OF HUMAN REMAINS

Pursuant to Sections 5097.97 and 5097.98 of the State Public Resources Code, and Section 7050.5 of the State Health and Safety Code, if a human bone or bone of unknown origin is found during construction, all work is to stop, and the County Coroner, and Wilton Rancheria shall be immediately notified. If the remains are determined to be Native American, the coroner shall notify the Native American Heritage Commission within 24 hours, and the Native American Heritage Commission shall identify the person or persons it believes to be the most likely descendent from the deceased Native American. The most likely descendent may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposition of, with appropriate dignity, the human remains and any associated grave goods. Work may not proceed until the County has provided a reasonable path for work to resume.

VIII. GEOLOGY AND SOILS

GEO-1: INADVERTENT DISCOVERY OF PALEONTOLOGICAL RESOURCES

If paleontological resources are discovered during earthmoving activities, immediately cease work in the vicinity of the find and notify the Sacramento County Department of Planning and Environmental Review. Retain a qualified paleontologist to evaluate the resource and prepare a recovery plan based on Society of Vertebrate Paleontology Guidelines.[118] The recovery plan may include, but is not limited to, a field survey, construction monitoring, sampling and date recovery procedures, museum curation for any specimen recovered, and a report of findings. Recommendations in the recovery plan that are determined by the County to be necessary and feasible will be implemented before construction activities can resume at the site where the paleontological resources were discovered.

XIV. NOISE

NOI-1: CONSTRUCTION NOISE MANAGEMENT PLAN FOR PIPELINE ALIGNMENT OPTION 2B

Prior to the start of construction activities associated with pipeline alignment Option 2B, a Construction Noise Management Plan shall be created that includes the following:

- Prior to the initiation of construction activities occurring within 100 feet of residences within the Tricon Sunridge residential community along Fiorenza Lane and Andria Lane, the contractor shall install temporary sound barriers and/or blankets and also maintain the sound barriers and/or blankets during such construction activities. Temporary sound barriers and/or blankets shall meet the following specifications:
    - The temporary sound barriers and/or blankets shall be installed in between the residences along Fiorenza Lane and Andria Lane and the construction area.
    - The temporary barriers/blankets shall be a minimum of 15 feet in height to block the line of sight between the construction area and the sensitive receptors along this section of the project alignment. Temporary blankets shall be of sufficient height to

[118] Society of Vertebrate Paleontology. 2010. Standard procedures for the assessment and mitigation of adverse impacts to paleontological resources. Society of Vertebrate Paleontology, McLean, VA.

extend from the top of the temporary construction fence and drape on the ground or be sealed at the ground.

- Barriers shall be constructed with a solid material that has a density of at least 1 pound per square foot with no gaps from the ground to the top of the barrier. The barriers shall have an STC rating of 32 or higher.

- At least 10 days prior to the start of construction activities occurring near residences within the Tricon Sunridge residential community, a sign shall be posted at the construction site, or other conspicuous location, that includes a telephone number for project information, and a procedure in which a construction manager will respond to and investigate noise complaints and take corrective action, if necessary, in a timely manner.

- At least 21 days prior to the start of construction activities, residences within the Tricon Sunridge residential community shall be notified of the planned construction activities. The notification shall include a brief description of the project, the activities that would occur, the hours when construction would occur, and the construction period's overall duration. The notification shall include the telephone numbers of the City's and contractor's authorized representatives that are assigned to respond in the event of a noise complaint.

- If a construction noise complaint is registered and if a member of the City's Code Enforcement team is not available to make noise measurements, the Applicant, if and as directed by the City, shall retain a City-approved noise consultant to conduct noise measurements at the properties that registered the complaint. The noise measurements shall be conducted for a minimum of one hour. The consultant shall prepare a letter report for code enforcement summarizing the measurements, calculation data used in determining impacts, and potential measures to reduce noise levels to the maximum extent feasible.

- Prior to the start of and for the duration of construction, the contractor shall properly maintain and tune all construction equipment in accordance with the manufacturer's recommendations to minimize noise emissions.

- Prior to use of any construction equipment, the contractor shall fit all equipment with properly operating mufflers, air intake silencers, and engine shrouds no less effective than as originally equipped by the manufacturer.

- Material hauling and deliveries shall be coordinated by the construction contractor to reduce the potential of trucks waiting to unload for protracted periods of time.

- To the extent feasible, hydraulic equipment shall be used instead of pneumatic impact tools, and electric-powered equipment shall be used instead of diesel-powered equipment.

- Stationary noise sources (e.g., generators) shall be located as far from sensitive receptors as practicable, and they shall be muffled and enclosed within temporary sheds, or insulation barriers with a minimum STC rating of 32.

- The use of bells, whistles, alarms, and horns shall be restricted to safety warning purposes only.

- Signs shall be posted at the job site entrance(s), within the on-site construction zones, and along queueing lanes (if any) to reinforce the prohibition of unnecessary engine idling. All other equipment shall be turned off if not in use for more than five minutes. The construction manager shall be responsible for enforcing this.

XIX. TRIBAL CULTURAL RESOURCES

TCR-1: COMPENSATED CONSTRUCTION MONITORING BY OFFICIAL TRIBAL MONITOR

The project applicant is required to retain an official tribal monitor from the Wilton Rancheria to observe all ground disturbance activities to occur during the construction phase in accordance with the approved treatment plan:

1. **Communication Protocols for Monitoring:** The applicant shall develop a set of communication protocols, to the satisfaction of the County and consulting tribe to identify all points of contact and to ensure that Wilton Rancheria is notified when the applicant will proceed with authorized construction activities. Points of contact will be established for the applicant, construction supervisor, monitoring tribes, and County Archaeologist, and the contact numbers and email addresses must be documented and shared among all parties. These shall be included in the Tribal Monitoring and Discovery Treatment Plan. Points of contact are responsible for identifying backup representatives in the event they are unable to perform due to an absence or other reasons.

2. **Tribal Monitoring:** All construction-related ground-disturbing activities shall be monitored by a qualified tribal representative from Wilton Rancheria on this project to ensure that the procedures outlined in the Tribal Monitoring and Discovery Treatment Plan are addressed expeditiously and in accordance with the plan. The requirements for a monitor should be inclusive of all day and night construction activity that has the potential to result in ground disturbance. “Ground-disturbing activity” is defined herein as any activities that have the potential to disturb soil beyond that which was reasonably visible to tribal representatives and archaeologists during the pre-project pedestrian survey. This includes grading; trenching; excavation for below-ground utility installation or foundation work; and any other below-the-ground activities. Monitoring is not required for backfilling of previously excavated areas, placement of equipment into excavated areas, reseeding, or revegetation, re-grading or contouring of soil that was previously monitored, or for any aboveground project activity or construction that does not include ground disturbance, but monitors are allowed to observe upon request.

MITIGATION MEASURE COMPLIANCE

Comply with the Mitigation Monitoring and Reporting Program (MMRP) for the Kiefer Landfill Gas Utilization Project as follows:

It shall be the responsibility of the project applicant to reimburse the County for all expenses incurred in the implementation of the Mitigation Monitoring and Reporting Program (MMRP), including any necessary enforcement actions. The applicant shall pay an initial deposit of **$8,200.00**, which includes administrative costs of **$1,167.00**. Over the course of the project, the Office of Planning and Environmental Review will regularly conduct cost accounting and submit invoices to the applicant when the County monitoring costs exceed the initial deposit.

Until the MMRP has been recorded and the administrative portion of the MMRP fee has been paid, no final parcel map or final subdivision map for the subject property shall be approved. Until the balance of the MMRP fee has been paid, no encroachment, grading, building, sewer connection, water connection or occupancy permit from Sacramento County shall be approved.

LIST OF PREPARERS

LEAD AGENCY

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Associate Planner:	Alex Pretzer
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TECHNICAL CONSULTANTS

Rincon Consultants	Air Quality and Greenhouse Gas Study for the Pipeline and Compressor Stations Noise Study (for the Pipeline and Compressor Stations) Cultural Resources Technical Report
SCS Engineers	Air Quality and Greenhouse Gas Emissions Data for the RNG Plant
Vollmar Natural Lands Consulting	Aquatic Resource Delineation Report Biological Resources Evaluation Rare Plant Survey Report Special-Status Wildlife Habitat Assessment

REFERENCES/CITATIONS

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APPENDICES

The following appendices are provided under separate cover:

Appendix A: Air Quality and Greenhouse Gas Technical Studies, Data, and Modeling Outputs

Appendix B: Biological Resource Evaluation

Appendix C: Aquatic Resource Delineation Report

Appendix D: Special Status Wildlife Habitat Assessment

Appendix E: Rare Plant Survey Report

Appendix F: Cultural Resources Technical Report

Appendix G: Noise Study

Appendix H: Native American Heritage Commission and Tribal Contacts

Todd Smith, Planning Director Planning and Environmental Review

Troy Givans, Director
Department of Community Development

County of Sacramento

Planning and Environmental Review Memorandum

October 13, 2026

To: Grading Administrator

From: Julie Newton
Environmental Coordinator

Subject: Environmental Document Package for the Kiefer Landfill Gas Utilization Project (PLER2024-00137)

Planning and Environmental Review (PER) prepared an Initial Study/Mitigated Negative Declaration (IS/MND) for the project and circulated the IS/MND for a 30-day public review period commencing on June 12, 2026, and concluding on July 11, 2026 (State Clearinghouse No. 2026060539). The public review period was then extended to July 27, 2026. Seven comment letters were received during the public review period from both public agencies and interested parties. Although not required under CEQA, written responses were prepared addressing the comments received on the IS/MND.

The IS/MND and the errata and response to comments enclosed with this memo constitute the final environmental document. The IS/MND remains applicable and adequate for the subject project.

COUNTY OF SACRAMENTO
PLANNING AND ENVIRONMENTAL REVIEW
ERRATA and RESPONSE to COMMENTS

The Draft IS/MND was distributed pursuant to CEQA and its implementing guidelines. The Draft IS/MND was circulated from June 12, 2026, to July 11, 2026, for a 30-day public review period. This public review period was extended to July 27, 2026. The purpose of the public review period was to provide interested public agencies, organizations, and individuals the opportunity to comment on the discussion and conclusions in the IS/MND regarding potential environmental impacts of the proposed project. The IS/MND and Notice of Intent (NOI) to Adopt a Mitigated Negative Declaration were distributed to the California Governor's Office of Land Use and Climate Innovation, State Clearinghouse. The NOI was distributed to approximately seven (7) agencies, Native American tribal contacts, and community stakeholders, as well as 233 owners and occupants of properties adjacent to the project site. The NOI informed them of where the IS/MND could be reviewed and how to comment. A copy of the IS/MND was posted on the Sacramento County Planning and Environmental Review website at https://planning.saccounty.gov/, and contact information was provided where the public could request a copy of the document.

ERRATA TO THE DRAFT IS/MND

The following clarifications and modifications are intended to update the IS/MND in response to the comments received during the public review period. These changes are incorporated into the IS/MND, to be presented to the Grading Administrator for adoption and project approval. None of these changes to the IS/MND represent a substantial change to the proposed project that would alter the conclusions reached in the IS/MND. Revisions made to the IS/MND have not resulted in the identification of new significant impacts requiring mitigation measures, nor has the severity of a previously identified impact increased. Pursuant to CEQA Guidelines Section 15073.5, none of the CEQA criteria for recirculation have been met, and recirculation of the MND is not warranted.

The following revisions to the IS/MND are listed below by section, page number, and paragraph number, as applicable. Text which has been removed is shown with a ~~strikethrough~~ line, while text that has been added is shown as <u>underlined</u>. Please refer to the Response to Comments section for referenced comment letters and corresponding comments.

<u>Page IS-</u>	<u>Clarification/Modification</u>
6	*In response to Comment 6-1, the following text has been added to page IS-6, Option 1 – Distribution Connection Route (Base-case) after the 1st paragraph, to note that the optional compressor station site located east of Sunrise Boulevard between Herodian Drive and Douglas Road is no longer being considered by the applicant:* <u>Note, the optional compressor station site located east of Sunrise Boulevard, between Herodian Drive and Douglas Road, is no longer being considered by the applicant as part of the proposed project. However, the analysis of the optional compressor station site has been retained for informational purposes and reflects greater impacts than would occur under the proposed project. Accordingly, the proposed project would be expected to result in fewer potential impacts than those analyzed herein.</u>
8	*In response to Comment 5-2, the following text has been added to page IS-8, Pipeline, after the 2nd paragraph:* <u>Gas, electric, water, sewer, and communication facilities are located along the project alignment and may require adjustment or relocation. Specifically, there are several SMUD overhead lines with fiber optic communication cables, in addition to underground facilities crossing along or through the project alignment. Utility relocation coordination will be an on-going effort as the project progresses and conflicts are identified and resolved with utility companies. Utility relocation will not result in an increase to service nor are prolonged service interruptions anticipated.</u>
8-10	*In response to Comment 4-13 and 4-14, the following text on pages IS-8 through IS-10, Operation, is revised as follows:*

Upon completion of construction, the RNG plant would undergo a commissioning period during which plant equipment, control systems, and gas treatment processes would be tested, verified, calibrated, and adjusted as necessary to achieve design performance specifications. Commissioning is anticipated to occur over approximately 4 months. During this period, process waste gas generated by the gas upgrading system would be combusted in the thermal oxidizer and any off-specification RNG would be combusted in the two new enclosed off-specification flares. Emissions associated with commissioning activities would be limited to permitted combustion sources, including the thermal oxidizer and enclosed off-specification flares. The RNG plant is designed as a closed-loop gas treatment system and does not include routine venting of landfill gas or process gas to the atmosphere. The facility would include pressure relief and overpressure protection devices as required by applicable engineering codes and safety regulations; however, these devices are intended solely for emergency equipment protection and would not be part of routine plant operations. Following successful commissioning, RNG gas, which meet PG&E quality specifications, would be introduced into the PG&E natural gas pipeline system for beneficial use.

The proposed RNG plant would be the primary use of the landfill gas at project completion with the option of operating up to two of the existing engines at the existing plants which would be converted from running on landfill gas to running on natural gas. The existing engines converted to operate on natural gas would be used to provide electricity to support operation of the RNG plant. The RNG plant, landfill gas collection and control system (GCCS), landfill flares, electrical generation equipment, and associated utility infrastructure constitute critical landfill infrastructure that supports continued compliance with landfill gas collection, control, monitoring, and environmental protection requirements. During operations, the RNG plant may periodically undergo planned outages for preventive maintenance (anticipated approximately twice annually) as well as occasional unplanned outages for equipment repair or system troubleshooting. During such events, landfill gas would continue to be collected and managed through the existing Landfill ~~Gas Collection and Control System (~~GCCS~~)~~. Landfill gas that cannot be processed by the RNG plant would be diverted to the existing permitted landfill flares (Flares No. 1 and No. 2) for combustion. Flare No. 1 and Flare No. 2 are intended to operate only during planned or unplanned short-term outages of the RNG plant and are not intended for continuous operation during normal project conditions. During normal operation, the RNG plant is designed to process the available landfill gas, with the flares serving as backup gas control devices. Because the frequency and duration of planned and unplanned outages cannot be predicted, specific annual operating percentages cannot be established. Therefore, the air quality analysis conservatively assumes operation of Flare No. 1 and Flare No. 2 for up to 20 percent of the year. The project's Potential to Emit (PTE) analysis conservatively assumes operation of the landfill flares approximately 20 percent of the time, which encompasses anticipated startup, shutdown, maintenance, transition, and contingency operating conditions.

During the peak operation day, it is anticipated that seven employees would be employed at the RNG plant. The carbon media change out for the sulfur treatment would occur approximately once a year with an additional 10

employees on site to facilitate the change-out. Major maintenance and service for the RNG plant is anticipated to occur with up to two planned outages per year; however, other maintenance activities would take place, as needed, during planned and unplanned outages.

Transitions between RNG plant operations and landfill flare operations would be conducted in accordance with established operating procedures. Supervisory Control and Data Acquisition (SCADA) systems would provide continuous monitoring of gas flows, pressures, equipment status, and alarm conditions. During planned or unplanned RNG plant outages, landfill personnel would place the landfill flares in service and adjust gas routing valves as necessary to direct landfill gas to the permitted flare system. During these transitions, continuous vacuum within the landfill gas collection system would be maintained and landfill gas would remain under active collection and control, preventing uncontrolled landfill gas releases during both routine and non-routine operating conditions. Flare No. 1 and Flare No. 2, together with their associated blower system, are capable of maintaining the required landfill gas collection system operating conditions, including adequate vacuum and negative pressure, during RNG plant outages. This is consistent with the current landfill operating configuration, under which the flare system provides gas control during shutdowns of the existing landfill gas-to-electricity facility. The proposed project would not modify the flare system configuration or reduce its operational capacity. As documented in Scenario 4 of the January 22, 2026 memorandum, the flare system is capable of operating continuously, if necessary, while maintaining compliance with landfill gas collection and control requirements. An unplanned power outage affecting the RNG plant would not affect operation of Flare No. 1 and Flare No. 2 because the RNG plant is owned and operated by Kiefer Landfill Generating III, LLC, while the flare system is owned and operated independently by the County of Sacramento Department of Waste Management and Recycling. During planned or unplanned RNG plant outages, landfill gas would be redirected to the existing flare system using established landfill operating procedures to maintain continuous gas collection and control. Because the flare system is an existing component of the landfill gas collection system, no new operational impacts to the gas collection system are anticipated during these transitions.

Operational monitoring, alarm systems, and established operating procedures would be used during startup, shutdown, maintenance, commissioning, and upset conditions to ensure continued compliance with applicable landfill gas control requirements, air district permit conditions, and air quality regulations. Under both routine and non-routine operating scenarios, landfill gas would either be processed through the RNG plant or combusted in permitted control devices, thereby maintaining continuous landfill gas control and minimizing emissions. The operational emissions analysis presented in this MND includes emissions from applicable operational sources that would remain onsite following project implementation, including the converted engines, internal combustion engine, existing flares (operated under the conservative 20-percent annual assumption), street sweepers, and other applicable operational equipment associated with the landfill.

11-12 The following text in "Other Public Agencies Whose Approval is Required" is revised as follows:

SACRAMENTO COUNTY

- South Sacramento Habitat Conservation Plan Permit (includes U.S. Army Corps of Engineers Section Clean Water Act 404~~;~~ and Central Valley Regional Water Quality Control Board Clean Water Act Section 401~~; and California Department of Fish and Wildlife Section 1602 Lake and Streambed Alteration Program~~ permits)
- Grading Permit
- Department of Transportation: Approval of Traffic Control Plans

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE

- Section 1602 Lake and Streambed Alteration Program Permit

12 *In response to Comment 2-2, the following text in "Other Public Agencies Whose Approval is Required," is revised as follows:*

CENTRAL VALLEY FLOOD PROTECTION BOARD

- Encroachment Permit

38 *In response to Comment 4-2, the following text on page IS-38, Air Quality, is revised as follows:*

The following mitigation measures would be implemented during construction of the project to reduce potential impacts related to air quality and at the request of the SMAQMD.

AQ-1: REDUCE CONSTRUCTION-GENERATED FUGITIVE DUST AND EXHAUST

Construction contractors must implement the measures listed below to reduce construction-generated fugitive dust. Control of fugitive dust is required per SMAQMD Rule 403 and enforced by SMAQMD staff. The list of required measures was informed by SMAQMD's basic ~~and enhanced~~ construction emission control practices.

39 *In response to Comment 4-2, Mitigation Measure AQ-2 in Section IV, Air Quality, has been added to reduce off-road equipment exhaust-related emissions during construction:*

AQ-2: REDUCE OFF-ROAD EQUIPMENT EXHAUST-RELATED EMISSIONS DURING CONSTRUCTION

For construction activities within the project area, including the compressor station site and renewable natural gas pipeline, construction contractor(s) shall

ensure that off-road diesel-fueled equipment with engines larger than 50 horsepower shall meet or exceed CARB Tier 4 Final emissions standards.

An exemption from these requirements may be granted by the County if the construction contractor(s) submits documents to the County demonstrating that equipment with the required tier is not reasonably available. Before an exemption may be considered by the County, construction contractor(s) shall be required to demonstrate that two construction fleet owners/operators in Sacramento County were contacted and that those owners/operators confirmed Tier 4 final equipment could not be located within Sacramento County.

57 *In response to Comment 3-8, the following discussion has been added in Section V, Biological Resources, along with Mitigation Measure BIO-8, to address the recently approved CESA listing of Western Spadefoot as a candidate species:*

On August 14, 2026, the California Fish and Game Commission approved the listing of the Western Spadefoot to a candidate species under CESA. Initial surveys for the project have been completed and potential habitat for Western Spadefoot was identified. Additional winter surveys are anticipated to be completed during the breeding season prior to start of construction of any portion of the project. Implementation of Mitigation Measure BIO-8 would reduce potential impacts to Western Spadefoot to a less than significant level.

59 *The following text in "Environmental Mitigation Measures" in Section V, Biological Resources, is revised as follows:*

BIO-1: PROJECT COVERAGE UNDER SSHCP

The project proponent shall obtain coverage for the project under the SSHCP with a signed SSHCP authorization form. This shall include submittal of all required application materials per SSHCP Section 10.4.2 and payment of all applicable fees consistent with current SSHCP requirements to mitigate for impacts to species and habitat prior to construction. All applicable fees shall be paid prior to ~~the issuance of a grading permit~~ ground disturbing activities for the project. If a grading permit is not required, fee payment agreement shall be fully executed prior to issuance of the project's building permit. As part of the SSHCP authorization, impacts to land cover types would be evaluated. Impacts to Vernal Pool Fairy Shrimp, Midvalley Fairy Shrimp, and Vernal Pool Tadpole Shrimp are covered under the mitigation for impacts to Vernal Pools. Implementation of the Project will be required to comply with all applicable AMMs from the SSHCP to avoid and/or minimize impacts on habitat and special-status species that have a moderate or high potential to be located on or near the project site, including Swainson's Hawk, Tricolored Blackbird, Burrowing Owl (with the exception of AMM WBO-5), Western Spadefoot Toad, and Western Pond Turtle.

60-61 *In response to Comment 3-5, Mitigation Measure BIO-3 in Section V, Biological Resources, is revised as follows:*

Initial ground-disturbing work (e.g., grading, vegetation removal, staging) shall take place between August 15 and March 15, if feasible, to avoid impacts on nesting Crotch's bumble bees.

Regardless of the feasibility of the above limited operating period, a qualified biologist familiar with bumble bees of California and experienced using survey methods for bumble bees shall conduct a ~~habitat assessment and focused survey~~ Protocol Survey for Crotch's bumble bee before the start of any ground-disturbing activities. Surveys shall be performed when Crotch's bumble bee is most likely to be identified, typically from ~~April through August~~ March 1 through October 31 (i.e., the colony active period) when floral resources and ideal weather conditions are present, and shall follow the methods in Survey Considerations for CESA Candidate Bumble Bee Species.32 Surveys shall be conducted during the colony active period closest to the start of planned construction activities. Survey results shall be submitted to the project applicant and Sacramento County no less than 7 days before construction begins.

- Crotch's Bumble Bee Protocol Survey. If Project activities are proposed to occur during the active season for CBB, Project Proponent shall develop a Pre-Construction Survey Plan for CBB and submit it to Sacramento County for acceptance, developed in coordination with CDFW (see https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150&inline). A total of three surveys shall be conducted prior to any ground-disturbing project activities or vegetation removal that will take place during the active season for CBB (March 1 through October 31), or until all flowering vegetation is largely desiccated, to determine if any active nests are within the project area. Each survey shall be spaced two to four weeks apart, unless otherwise authorized in writing by Sacramento County in coordination with CDFW, with the last survey taking place within 72 hours prior to construction activity. A Qualified Biologist shall perform meandering transects through the planned construction footprint, plus a 50-foot buffer where accessible, between 9:00 am and 1:00 pm where feasible and at least one hour after sunrise and at least two hours before sunset, to visually survey the area for CBB activity. The duration of the survey will be the minimum amount of time necessary to adequately survey the area, typically at least one hour of surveying per three acres of potential habitat, excluding capture, chilling, photo, identification, and release time. For each sampling event, the Qualified Biologist shall survey suitable habitat using non-lethal photo voucher and netting methods, developed in coordination with CDFW (see https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150&inline). If a suspected or confirmed CBB is identified during any of these surveys, the Qualified Biologist shall notify Sacramento County within 48 hours.

  If only foraging CBB or CBB nests are observed, a no-disturbance buffer of at least 50 feet from plants CBB have been identified as foraging from shall be established and the project proponent shall consult with Sacramento County and CDFW to demonstrate compliance with CESA.

- ~~The project applicant shall submit a survey report to CDFW within 1 month of survey completion and shall notify CDFW and Sacramento County within 24 hours if Crotch's bumble bees are detected.~~

- ~~If Crotch's bumble bees are detected during the focused survey, appropriate avoidance measures shall be implemented. Avoidance measures shall include, but not be limited to, the following:~~

- ~~Protective buffers shall be implemented around active nesting colonies until these sites are no longer active. A qualified biologist, in coordination with CDFW, shall determine the appropriate buffer size to protect nesting colonies; however, the buffer shall be a minimum of 50 feet.~~

- If impacts on Crotch's bumble bee cannot be avoided, project applicant shall obtain an ITP from CDFW and shall implement all avoidance measures included in the ITP.

- If Crotch's bumble bee is added to the SSHCP as a covered species at a later date, any AMMs associated with this species shall supersede these measures. If Crotch's bumble bee is added to the SSHCP CDFW ITP at a later date, the project applicant shall obtain incidental take coverage for this species through participation in the SSHCP.

62-64 *In response to Comment 3-6, Mitigation Measure BIO-5 in Section V, Biological Resources, is revised as follows:*

On October 10, 2024, the California Fish and Game Commission accepted a petition to list western burrowing owl under CESA and designated the species as a candidate species. Pursuant to CESA, take of candidate species is prohibited. While western burrowing owl is a covered species under the SSHCP, the plan's CDFW 2081 Incidental Take Permit (ITP) does not include take coverage for the species. Pursuant to the SSHCP, the potential listing of western burrowing owl under CESA would be considered a changed circumstance that will trigger review by the SSHCP Technical Advisory Committee and an eventual amendment that will likely result in a change to the SSHCP, and addition of western burrowing owl to the SSHCP CDFW 2081 ITP.

In the interim period during which take coverage for western burrowing owl is not available through participation in the SSHCP, to avoid take of burrowing owl, the project applicant shall implement the following:

~~1. Burrowing Owl Surveys. Project proponent shall conduct a burrowing owl survey over all suitable habitat present within Project area. Burrowing owl surveys shall be conducted by a qualified biologist in accordance with the protocol described in the Staff Report on Burrowing Owl Mitigation (CDFW, March 7, 2012). If possible, surveys should be conducted during both the breeding (February 1 – August 31) and non-breeding seasons (September 1 – January 31) immediately preceding the planned start of construction activities to ascertain the seasonal residency status of any owls occupying the site. The presence of burrowing owl or their sign anywhere on the site or within a 500-foot accessible radius around the project site shall be recorded and mapped. Surveys shall disclose all burrows and occurrence of sign of burrowing owl on the project site and within the 500-foot buffer. Results of the survey shall be submitted to the County.~~

1. **Burrowing Owl Surveys.** Prior to beginning ground-disturbing project activities, a Qualified Biologist shall conduct at least four surveys using the methods described in most recent guidelines from CDFW's *Staff Report on Burrowing Owl Mitigation*, *Appendix D* (2012). Surveys shall be conducted

during the breeding season (February 1 to August 31) and include no fewer than four survey visits: at least one site visit between February 15 and April 15 and a minimum of three survey visits, at least three weeks apart, between April 15 and July 15, with at least one visit after June 15. Surveys shall also be conducted during the non-breeding season (September 1 to January 31) before the start of construction activities to determine seasonal residency. Nonbreeding season surveys shall consist of at least four visits, spread evenly, throughout the nonbreeding season. The presence of BUOW individuals, burrow complexes, or their sign (e.g., molted feathers, cast pellets, prey remains, eggshell fragments, owl whitewash, nest burrow decoration materials, etc.) anywhere onsite or within a 1,650-foot accessible radius around the project Area shall be recorded and mapped. The Qualified Biologist shall submit the results of the survey to Sacramento County prior to beginning project activities. If changes in BUOW presence are detected (e.g., BUOW have moved onsite or changed burrow use), the Qualified Biologist shall contact Sacramento County by phone or email within 24 hours of the observation to consult on appropriate measures to avoid impacts of the project to BUOW and the Qualified Biologist shall establish no-disturbance buffers. The Qualified Biologist could modify the nest buffer with written approval from Sacramento County in coordination with CDFW.

2. **Burrowing Owl Take Avoidance.** During the breeding season (February 1 to August 31), surveys shall document whether burrowing owl are nesting in or within ~~500~~ 1,650 feet of the project area. During the non-breeding season (September 1 to January 31), surveys shall document whether burrowing owl are using habitat in or directly adjacent to any area to be disturbed. Survey results shall only be valid for the season (breeding or non-breeding) during which the survey was conducted. If a lapse in project-related work of fifteen (15) calendar days or longer occurs, another focused survey and consultation with the County and CDFW shall be required before project work can be reinitiated. If a burrowing owl or evidence of presence at or near a burrow entrance is found to occur within ~~500~~ 1,650 feet of the project site, the following measures shall be implemented:

   - If burrowing owl are found during the non-breeding season (approximately September 1 to January 31), the ~~project applicant~~ qualified biologist shall establish a ~~minimum 160-foot (50-meter)~~ no-disturbance buffer zone around active burrows. The buffer zone shall be flagged or otherwise clearly marked. Measures such as visual screens may be used to further reduce the buffer with CDFW approval and provided a qualified biologist confirms that such measures do not cause agitated behavior.

   - If burrowing owl are found during the breeding season (approximately February 1 to August 31), the project applicant shall:

     - Avoid all nest sites that could be disturbed by project construction during the remainder of the breeding season or while the nest is occupied by adults or young (occupation includes individuals or family groups foraging on or near the site following fledging).

- Establish a minimum ~~500~~ 1,650-foot non-disturbance buffer zone around nests, unless otherwise approved by the County in writing, in consultation with CDFW. The buffer zone shall be flagged or otherwise clearly marked. Should construction activities cause the nesting bird to vocalize, make defensive flights at intruders, or otherwise display agitated behavior, then the exclusionary buffer will be increased such that activities are far enough from the nest so that the bird(s) no longer display this agitated behavior. Construction shall only occur within the 500-foot buffer zone during the breeding season if a qualified biologist monitors the nest and determines that the activities do not disturb nesting behavior, or the birds have not begun egg-laying and incubation, or that the juveniles from the occupied burrows have fledged and moved off site. Any modifications to this buffer shall be approved by the County, in consultation with CDFW prior to its implementation. The buffer reduction request shall include relevant information and/or propose new measures to justify the buffer reduction. The buffer area must be clearly marked to prevent project-related activities from occurring within the buffer zone.

3. **Eviction of Burrowing Owls.** If after all applicable avoidance and minimization measures are implemented and project proponent needs to evict burrowing owl, an ITP shall be obtained for the activity and a burrowing owl eviction plan shall be developed by a qualified biologist for the County's review and approval, in consultation with CDFW. This plan, including its proposed mitigation, shall be consistent with the most recent available guidelines (e.g., 2012 Staff Report on Burrowing Owl Mitigation[1]). Burrow eviction shall only be conducted during the non-breeding season for burrows located in the project footprint, and in limited instances within a buffer zone around the project site, as determined by the County in consultation with CDFW after all avoidance and minimization measures have been exhausted.

64-65 *In response to Comment 3-7, Mitigation Measure BIO-6 in Section V, Biological Resources, is revised as follows:*

Adequate measures shall be taken to avoid inadvertent take of migratory bird nests when in active use. This shall be accomplished by taking the following steps:

- If construction is proposed during the nesting season (February 1 to September 15, inclusive), a survey for nesting birds shall be conducted by a qualified biologist within seven days prior to the onset of ground disturbing activities to identify any active nests (i.e., nests containing eggs and/or young) of migratory and/or non-raptor bird species. Surveys will be performed for the project site, vehicle and equipment staging areas, and suitable habitat within 500 feet for all migratory and/or non-raptor nesting birds of the project site to locate any active migratory bird nests. If project related work does not

[1] California Department of Fish and Wildlife. (2012). Staff Report on Burrowing Owl Mitigation. March 7. Available at: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83843&inline=true

commence within seven days, or if there is a lapse in construction activities totaling seven days or more, additional surveys will be required.

- If no active nests are identified during the survey period, or if development is initiated during the non-breeding season, construction may proceed with no restrictions.

- If active nests are found, an adequate no-disturbance buffer shall be established around the nest location and construction activities shall be restricted within the buffer until a qualified biologist has confirmed that any young birds have fledged and are able to leave the construction area. Required setback distances for the no-disturbance buffer will be established by the qualified biologist and may vary depending on the species, line-of-sight between the nest, and the construction activity, and the birds' sensitivity to disturbance. As necessary, the no-disturbance zone will be fenced with temporary orange construction fencing, high visibility rope, or a similar visual barrier if construction is to be initiated on the remainder of the development site. The buffer shall be kept in place until after the breeding nesting season or until a qualified biologist confirms the young have fledges, are foraging independently, and the nest is no longer active for the season.

- Any birds that begin nesting within the project site and survey buffers during construction activities will be assumed to be habituated to construction-related or similar noise and disturbance levels and no-disturbance zones shall not be established around active nests in these cases; however, should birds nesting within the project site and survey buffers during construction activities begin to show disturbance associated with construction activities, no-disturbance buffers shall be established as determined by the qualified wildlife biologist.

- A report of findings will be prepared by the qualified biologist and submitted to the County for review and approval prior to initiation of construction within the no-disturbance zone during the nesting season. The report will either confirm absence of any active nests or will confirm that any young within a designated no-disturbance zone have fledged and construction can proceed.

66 *In response to Comment 3-8, Mitigation Measure BIO-8: Western Spadefoot has been added as the California Fish and Game Commission approved the listing of Western Spadefoot to a candidate species under CESA:*

BIO-8: WESTERN SPADEFOOT AVOIDANCE

The California Fish and Game Commission received a petition on September 24, 2025, to list the western spadefoot as a candidate species under CESA and designated the species as a candidate species. Pursuant to CESA, take of candidate species is prohibited. While western spadefoot is a covered species under the SSHCP, the plan's CDFW 2081 Incidental Take Permit (ITP) does not include take coverage for the species. Pursuant to the SSHCP, the potential listing of western spadefoot under CESA would be considered a changed circumstance that will trigger review by the SSHCP Technical Advisory Committee and an eventual amendment that will likely result in a change to the SSHCP, and addition of western spadefoot to the SSHCP CDFW 2081 ITP.

In the interim period during which take coverage for western spadefoot is not available through participation in the SSHCP, to avoid take of western spadefoot, the project applicant shall implement the following:

1. Habitat Evaluation and Delineation. Prior to initiating Project activities, a Qualified Biologist shall conduct a winter larval survey within the project area footprint. If the evaluation concludes that larval forms of the Western Spadefoot are present within the project area footprint, Sacramento County shall be consulted in coordination with CDFW and USFWS.

2. The project applicant shall minimize, to the extent feasible, permanent or temporary, fixed, exterior lighting, including motion-triggered security lighting that casts light on western spadefoot habitat beyond the Project Area between sunset and sunrise. Nighttime construction lighting shall be shielded and oriented downward to minimize effects on any nearby western spadefoot habitat.

148 *The following text in "Impact Discussion XXII.a, Mandatory Findings of Significance" is revised as follows:*

Less Than Significant With Mitigation. As discussed in Section V. (Biological Resources), potential impacts were identified to riparian and aquatic habitats, sensitive plant and wildlife species, and nesting migratory birds. The proposed project would be required to implement Mitigation Measure BIO-1, Project Coverage under SSHCP, and all applicable AMMs from the SSHCP to ensure that the project complies with the SSHCP to support conservation of biological resources. The project would also implement Mitigation Measures BIO-2 through BIO-5 and BIO-8 to protect special-species including rare plants, Crotch's bumble bee, monarch butterflies, ~~and~~ burrowing owls, and western spadefoot toad. Implementation of Mitigation Measures BIO-6 and BIO-7 would protect nesting bird, including raptor, populations to ensure they remain undisturbed during project activities. With adherence to the listed mitigation measures, the project would not have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or substantially reduce the number or restrict the range of a rare or endangered plant or animal. As discussed in Section VI. (Cultural Resources), the project would not have the potential to eliminate important examples of the major periods of California history or prehistory. However, in the event of an unanticipated discovery of archaeological resources or human remains, implementation of Mitigation Measures CUL-1 and CUL-2 would ensure impacts to cultural resources would be less than significant.

151 *The following text in the 2nd paragraph of "Impact Discussion XXII.c, Mandatory Findings of Significance" is revised as follows:*

As discussed in Section I (Aesthetics), although the project is primarily in a nonurbanized area, construction could cause short-term visual impacts visible to nearby neighborhoods. The proposed RNG plant may also introduce lighting consistent with existing sources, resulting in less-than-significant impacts. As discussed in Section IV (Air Quality), the project would result in emissions during

construction of the project. However, Mitigation Measure AQ-1 would be implemented and would reduce impacts to less than significant. Additionally, Mitigation Measure AQ-2 has been included at the request of SMAQMD to reduce off-road equipment exhaust-related emissions during construction. As discussed in Section V (Biological Resources), the project would result in biological impacts during pipeline construction for the project. However, Mitigation Measures BIO-1 through BIO-~~7~~8 would be implemented and would reduce impacts to less than significant.

152-160 *In response to comments requiring revisions to the mitigation measures identified above, the Environmental Mitigation Measures sections for IV. Air Quality and V. Biological Resources are revised as follows:*

IV. AIR QUALITY

AQ-1: REDUCE CONSTRUCTION-GENERATED FUGITIVE DUST AND EXHAUST

Construction contractors must implement the measures listed below to reduce construction-generated fugitive dust. Control of fugitive dust is required per SMAQMD Rule 403 and enforced by SMAQMD staff. The list of required measures was informed by SMAQMD's basic ~~and enhanced~~ construction emission control practices.

AQ-2: REDUCE OFF-ROAD EQUIPMENT EXHAUST-RELATED EMISSIONS DURING CONSTRUCTION

For construction activities within the project area, including the compressor station site and renewable natural gas pipeline, construction contractor(s) shall ensure that off-road diesel-fueled equipment with engines larger than 50 horsepower shall meet or exceed CARB Tier 4 Final emissions standards.

An exemption from these requirements may be granted by the County if the construction contractor(s) submits documents to the County demonstrating that equipment with the required tier is not reasonably available. Before an exemption may be considered by the County, construction contractor(s) shall be required to demonstrate that two construction fleet owners/operators in Sacramento County were contacted and that those owners/operators confirmed Tier 4 final equipment could not be located within Sacramento County.

V. BIOLOGICAL RESOURCES

BIO-1: PROJECT COVERAGE UNDER SSHCP

The project proponent shall obtain coverage for the project under the SSHCP with a signed SSHCP authorization form. This shall include submittal of all required application materials per SSHCP Section 10.4.2 and payment of all applicable fees consistent with current SSHCP requirements to mitigate for impacts to species and habitat prior to construction. All applicable fees shall be paid prior to ~~the issuance of a grading permit~~ ground disturbing activities for the project. If a grading permit is not required, fee payment agreement shall be fully

executed prior to issuance of the project's building permit. As part of the SSHCP authorization, impacts to land cover types would be evaluated. Impacts to Vernal Pool Fairy Shrimp, Midvalley Fairy Shrimp, and Vernal Pool Tadpole Shrimp are covered under the mitigation for impacts to Vernal Pools. Implementation of the Project will be required to comply with all applicable AMMs from the SSHCP to avoid and/or minimize impacts on habitat and special-status species that have a moderate or high potential to be located on or near the project site, including Swainson's Hawk, Tricolored Blackbird, Burrowing Owl (with the exception of AMM WBO-5), Western Spadefoot Toad, and Western Pond Turtle.

BIO-3: CROTCH'S BUMBLE BEE AVOIDANCE

Initial ground-disturbing work (e.g., grading, vegetation removal, staging) shall take place between August 15 and March 15, if feasible, to avoid impacts on nesting Crotch's bumble bees.

Regardless of the feasibility of the above limited operating period, a qualified biologist familiar with bumble bees of California and experienced using survey methods for bumble bees shall conduct a ~~habitat assessment and focused survey~~ Protocol Survey for Crotch's bumble bee before the start of any ground-disturbing activities. Surveys shall be performed when Crotch's bumble bee is most likely to be identified, typically from ~~April through August~~ March 1 through October 31 (i.e., the colony active period) when floral resources and ideal weather conditions are present, and shall follow the methods in Survey Considerations for CESA Candidate Bumble Bee Species.[2] Surveys shall be conducted during the colony active period closest to the start of planned construction activities. Survey results shall be submitted to the project applicant and Sacramento County no less than 7 days before construction begins.

- Crotch's Bumble Bee Protocol Survey. If Project activities are proposed to occur during the active season for CBB, Project Proponent shall develop a Pre-Construction Survey Plan for CBB and submit it to Sacramento County for acceptance, developed in coordination with CDFW (see https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150&inline). A total of three surveys shall be conducted prior to any ground-disturbing project activities or vegetation removal that will take place during the active season for CBB (March 1 through October 31), or until all flowering vegetation is largely desiccated, to determine if any active nests are within the project area. Each survey shall be spaced two to four weeks apart, unless otherwise authorized in writing by Sacramento County in coordination with CDFW, with the last survey taking place within 72 hours prior to construction activity. A Qualified Biologist shall perform meandering transects through the planned construction footprint, plus a 50-foot buffer where accessible, between 9:00 am and 1:00 pm where feasible and at least one hour after sunrise and at least two hours before sunset, to visually survey the area for CBB activity. The duration of the survey will be the minimum amount of time necessary to adequately survey the area, typically at least one hour of surveying per three

[2] California Department of Fish and Wildlife. (2023). Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species. June 6. Available at: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150

acres of potential habitat, excluding capture, chilling, photo, identification, and release time. For each sampling event, the Qualified Biologist shall survey suitable habitat using non-lethal photo voucher and netting methods, developed in coordination with CDFW (see https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150&inline). If a suspected or confirmed CBB is identified during any of these surveys, the Qualified Biologist shall notify Sacramento County within 48 hours.

If only foraging CBB or CBB nests are observed, a no-disturbance buffer of at least 50 feet from plants CBB have been identified as foraging from shall be established and the project proponent shall consult with Sacramento County and CDFW to demonstrate compliance with CESA.

- ~~The project applicant shall submit a survey report to CDFW within 1 month of survey completion and shall notify CDFW and Sacramento County within 24 hours if Crotch's bumble bees are detected.~~

- ~~If Crotch's bumble bees are detected during the focused survey, appropriate avoidance measures shall be implemented. Avoidance measures shall include, but not be limited to, the following:~~

    - ~~Protective buffers shall be implemented around active nesting colonies until these sites are no longer active. A qualified biologist, in coordination with CDFW, shall determine the appropriate buffer size to protect nesting colonies; however, the buffer shall be a minimum of 50 feet.~~

    - If impacts on Crotch's bumble bee cannot be avoided, project applicant shall obtain an ITP from CDFW and shall implement all avoidance measures included in the ITP.

    - If Crotch's bumble bee is added to the SSHCP as a covered species at a later date, any AMMs associated with this species shall supersede these measures. If Crotch's bumble bee is added to the SSHCP CDFW ITP at a later date, the project applicant shall obtain incidental take coverage for this species through participation in the SSHCP.

BIO-5: BURROWING OWL

On October 10, 2024, the California Fish and Game Commission accepted a petition to list western burrowing owl under CESA and designated the species as a candidate species. Pursuant to CESA, take of candidate species is prohibited. While western burrowing owl is a covered species under the SSHCP, the plan's CDFW 2081 Incidental Take Permit (ITP) does not include take coverage for the species. Pursuant to the SSHCP, the potential listing of western burrowing owl under CESA would be considered a changed circumstance that will trigger review by the SSHCP Technical Advisory Committee and an eventual amendment that will likely result in a change to the SSHCP, and addition of western burrowing owl to the SSHCP CDFW 2081 ITP.

In the interim period during which take coverage for western burrowing owl is not available through participation in the SSHCP, to avoid take of burrowing owl, the project applicant shall implement the following:

~~1. Burrowing Owl Surveys. Project proponent shall conduct a burrowing owl survey over all suitable habitat present within Project area. Burrowing owl surveys shall be conducted by a qualified biologist in accordance with the protocol described in the Staff Report on Burrowing Owl Mitigation (CDFW, March 7, 2012). If possible, surveys should be conducted during both the breeding (February 1 – August 31) and non-breeding seasons (September 1 – January 31) immediately preceding the planned start of construction activities to ascertain the seasonal residency status of any owls occupying the site. The presence of burrowing owl or their sign anywhere on the site or within a 500-foot accessible radius around the project site shall be recorded and mapped. Surveys shall disclose all burrows and occurrence of sign of burrowing owl on the project site and within the 500-foot buffer. Results of the survey shall be submitted to the County.~~

1. **Burrowing Owl Surveys.** Prior to beginning ground-disturbing project activities, a Qualified Biologist shall conduct at least four surveys using the methods described in most recent guidelines from CDFW's *Staff Report on Burrowing Owl Mitigation*, *Appendix D* (2012). Surveys shall be conducted during the breeding season (February 1 to August 31) and include no fewer than four survey visits: at least one site visit between February 15 and April 15 and a minimum of three survey visits, at least three weeks apart, between April 15 and July 15, with at least one visit after June 15. Surveys shall also be conducted during the non-breeding season (September 1 to January 31) before the start of construction activities to determine seasonal residency. Nonbreeding season surveys shall consist of at least four visits, spread evenly, throughout the nonbreeding season. The presence of BUOW individuals, burrow complexes, or their sign (e.g., molted feathers, cast pellets, prey remains, eggshell fragments, owl whitewash, nest burrow decoration materials, etc.) anywhere onsite or within a 1,650-foot accessible radius around the project Area shall be recorded and mapped. The Qualified Biologist shall submit the results of the survey to Sacramento County prior to beginning project activities. If changes in BUOW presence are detected (e.g., BUOW have moved onsite or changed burrow use), the Qualified Biologist shall contact Sacramento County by phone or email within 24 hours of the observation to consult on appropriate measures to avoid impacts of the project to BUOW and the Qualified Biologist shall establish no-disturbance buffers. The Qualified Biologist could modify the nest buffer with written approval from Sacramento County in coordination with CDFW.

2. **Burrowing Owl Take Avoidance.** During the breeding season (February 1 to August 31), surveys shall document whether burrowing owl are nesting in or within ~~500~~ 1,,650 feet of the project area. During the non-breeding season (September 1 to January 31), surveys shall document whether burrowing owl are using habitat in or directly adjacent to any area to be disturbed. Survey results shall only be valid for the season (breeding or

non-breeding) during which the survey was conducted. If a lapse in project-related work of fifteen (15) calendar days or longer occurs, another focused survey and consultation with the County and CDFW shall be required before project work can be reinitiated. If a burrowing owl or evidence of presence at or near a burrow entrance is found to occur within ~~500~~ 1,650 feet of the project site, the following measures shall be implemented:

- If burrowing owl are found during the non-breeding season (approximately September 1 to January 31), the ~~project applicant~~ qualified biologist shall establish a ~~minimum 160-foot (50-meter)~~ no-disturbance buffer zone around active burrows. The buffer zone shall be flagged or otherwise clearly marked. Measures such as visual screens may be used to further reduce the buffer with CDFW approval and provided a qualified biologist confirms that such measures do not cause agitated behavior.

- If burrowing owl are found during the breeding season (approximately February 1 to August 31), the project applicant shall:

  - Avoid all nest sites that could be disturbed by project construction during the remainder of the breeding season or while the nest is occupied by adults or young (occupation includes individuals or family groups foraging on or near the site following fledging).

  - Establish a minimum ~~500~~ 1,650-foot non-disturbance buffer zone around nests, unless otherwise approved by the County in writing, in consultation with CDFW. The buffer zone shall be flagged or otherwise clearly marked. Should construction activities cause the nesting bird to vocalize, make defensive flights at intruders, or otherwise display agitated behavior, then the exclusionary buffer will be increased such that activities are far enough from the nest so that the bird(s) no longer display this agitated behavior. Construction shall only occur within the 500-foot buffer zone during the breeding season if a qualified biologist monitors the nest and determines that the activities do not disturb nesting behavior, or the birds have not begun egg-laying and incubation, or that the juveniles from the occupied burrows have fledged and moved off site. Any modifications to this buffer shall be approved by the County, in consultation with CDFW prior to its implementation. The buffer reduction request shall include relevant information and/or propose new measures to justify the buffer reduction. The buffer area must be clearly marked to prevent project-related activities from occurring within the buffer zone.

3. **Eviction of Burrowing Owls.** If after all applicable avoidance and minimization measures are implemented and Project proponent needs to evict burrowing owl, an ITP shall be obtained for the activity and a burrowing owl eviction plan shall be developed by a qualified biologist for the County's review and approval, in consultation with CDFW. This plan,

including its proposed mitigation, shall be consistent with the most recent available guidelines (e.g., 2012 Staff Report on Burrowing Owl Mitigation[3]). Burrow eviction shall only be conducted during the non-breeding season for burrows located in the project footprint, and in limited instances within a buffer zone around the project site, as determined by the County in consultation with CDFW after all avoidance and minimization measures have been exhausted.

BIO-6: NESTING BIRD PROTECTION

PRECONSTRUCTION SURVEYS FOR MIGRATORY AND NON-RAPTOR NESTING BIRDS

Adequate measures shall be taken to avoid inadvertent take of migratory bird nests when in active use. This shall be accomplished by taking the following steps:

- If construction is proposed during the nesting season (February 1 to September 15, inclusive), a survey for nesting birds shall be conducted by a qualified biologist within seven days prior to the onset of ground disturbing activities to identify any active nests (i.e., nests containing eggs and/or young) of migratory and/or non-raptor bird species. Surveys will be performed for the project site, vehicle and equipment staging areas, and suitable habitat within ¼-mile for raptors and 500 feet for all other nesting birds of the project site to locate any active migratory bird nests. If project related work does not commence within seven days, or if there is a lapse in construction activities totaling seven days or more, additional surveys will be required.

- If no active nests are identified during the survey period, or if development is initiated during the non-breeding season, construction may proceed with no restrictions.

- If active nests are found, an adequate no-disturbance buffer shall be established around the nest location and construction activities shall be restricted within the buffer until a qualified biologist has confirmed that any young birds have fledged and are able to leave the construction area. Required setback distances for the no-disturbance buffer will be established by the qualified biologist and may vary depending on the species, line-of-sight between the nest, and the construction activity, and the birds' sensitivity to disturbance. As necessary, the no-disturbance zone will be fenced with temporary orange construction fencing, high visibility rope, or a similar visual barrier if construction is to be initiated on the remainder of the development site. The buffer shall be kept in place until after the breeding nesting season or until a qualified biologist confirms the young have fledges, are foraging independently, and the nest is no longer active for the season.

[3] California Department of Fish and Wildlife. (2012). Staff Report on Burrowing Owl Mitigation. March 7. Available at: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83843&inline=true

- Any birds that begin nesting within the project site and survey buffers during construction activities will be assumed to be habituated to construction-related or similar noise and disturbance levels and no-disturbance zones shall not be established around active nests in these cases; however, should birds nesting within the project site and survey buffers during construction activities begin to show disturbance associated with construction activities, no-disturbance buffers shall be established as determined by the qualified wildlife biologist.

- A report of findings will be prepared by the qualified biologist and submitted to the County for review and approval prior to initiation of construction within the no-disturbance zone during the nesting season. The report will either confirm absence of any active nests or will confirm that any young within a designated no-disturbance zone have fledged and construction can proceed.

BIO-8: WESTERN SPADEFOOT AVOIDANCE

The California Fish and Game Commission received a petition on September 24, 2025, to list the western spadefoot as a candidate species under CESA and designated the species as a candidate species. Pursuant to CESA, take of candidate species is prohibited. While western spadefoot is a covered species under the SSHCP, the plan's CDFW 2081 Incidental Take Permit (ITP) does not include take coverage for the species. Pursuant to the SSHCP, the potential listing of western spadefoot under CESA would be considered a changed circumstance that will trigger review by the SSHCP Technical Advisory Committee and an eventual amendment that will likely result in a change to the SSHCP, and addition of western spadefoot to the SSHCP CDFW 2081 ITP.

In the interim period during which take coverage for western spadefoot is not available through participation in the SSHCP, to avoid take of western spadefoot, the project applicant shall implement the following:

1. Habitat Evaluation and Delineation. Prior to initiating Project activities, a Qualified Biologist shall conduct a winter larval survey within the project area footprint. If the evaluation concludes that larval forms of the Western Spadefoot are present within the project area footprint, Sacramento County shall be consulted in coordination with CDFW and USFWS.

2. The project applicant shall minimize, to the extent feasible, permanent or temporary, fixed, exterior lighting, including motion-triggered security lighting that casts light on western spadefoot habitat beyond the Project Area between sunset and sunrise. Nighttime construction lighting shall be shielded and oriented downward to minimize effects on any nearby western spadefoot habitat.

Appendix A *In response to Comment 4-4, the following three tables depicting the Summary of 2021-2025 Historical Actual Emissions and the Proposed Potential to Emit Summary for Scenarios 2 and 3 have been added to Appendix A to clarify how the project's air quality emissions were calculated.*

Table 1
Summary of 2021-2025 Historical Actual Emissions
Kiefer Landfill
Sloughhouse, California

Emission Source	Regulated Air Pollutant	2021 Actual		2022 Actual		2023 Actual		2024 Actual		2025 Actual		2-Year Average	
		lb/yr	ton/yr	lb/yr	ton/yr	lb/yr	ton/yr	lb/yr	ton/yr	lb/yr	ton/yr	lb/yr	ton/yr
Engine No. 1	Nitrogen Oxides (NOx)	23,010	11.50	32,057	16.03	28,664	14.33	21,517	10.76	15,606	7.80	30,361	15.18
	Carbon Monoxide (CO)	119,116	59.56	179,374	89.69	171,121	85.56	139,080	69.54	92,793	46.40	175,247	87.62
	Reactive Organic Compounds (ROC)	6,683	3.34	9,413	4.71	7,873	3.94	4,503	2.25	3,273	1.64	8,643	4.32
	Particulate Matter (PM)	3,039	1.52	3,322	1.66	2,047	1.02	3,554	1.78	880	0.44	2,685	1.34
	Sulfur Oxides (SOx)	3,382	1.69	3,293	1.65	2,855	1.43	2,410	1.20	1,478	0.74	3,074	1.54
Engine No. 2	Nitrogen Oxides (NOx)	26,092	13.05	27,885	13.94	24,476	12.24	17,681	8.84	8,466	4.23	26,180	13.09
	Carbon Monoxide (CO)	139,169	69.58	128,397	64.20	142,495	71.25	113,172	56.59	54,186	27.09	135,446	67.72
	Reactive Organic Compounds (ROC)	6,673	3.34	9,413	4.71	7,245	3.62	2,626	1.31	1,257	0.63	8,329	4.16
	Particulate Matter (PM)	2,887	1.44	3,322	1.66	2,562	1.28	1,404	0.70	314	0.16	2,942	1.47
	Sulfur Oxides (SOx)	3,696	1.85	3,293	1.65	2,975	1.49	2,083	1.04	997	0.50	3,134	1.57
Engine No. 3	Nitrogen Oxides (NOx)	24,114	12.06	28,738	14.37	26,545	13.27	16,044	8.02	16,610	8.31	27,642	13.82
	Carbon Monoxide (CO)	118,893	59.45	136,283	68.14	169,200	84.60	103,158	51.58	106,794	53.40	152,742	76.37
	Reactive Organic Compounds (ROC)	5,358	2.68	9,986	4.99	8,579	4.29	3,928	1.96	4,066	2.03	9,282	4.64
	Particulate Matter (PM)	1	0.00	1,609	0.80	2,563	1.28	1,593	0.80	863	0.43	2,086	1.04
	Sulfur Oxides (SOx)	3,454	1.73	2,996	1.50	2,806	1.40	1,779	0.89	1,841	0.92	2,901	1.45
Engine No. 4	Nitrogen Oxides (NOx)	19,233	9.62	31,342	15.67	30,587	15.29	27,901	13.95	23,209	11.60	30,965	15.48
	Carbon Monoxide (CO)	97,260	48.63	181,277	90.64	176,910	88.45	161,374	80.69	127,311	63.66	179,093	89.55
	Reactive Organic Compounds (ROC)	5,991	3.00	10,746	5.37	10,487	5.24	9,566	4.78	5,004	2.50	10,616	5.31
	Particulate Matter (PM)	2,680	1.34	2,776	1.39	2,709	1.35	2,471	1.24	1,523	0.76	2,743	1.37
	Sulfur Oxides (SOx)	2,263	1.13	2,866	1.43	2,797	1.40	2,551	1.28	895	0.45	2,831	1.42

Table 1
Summary of 2021-2025 Historical Actual Emissions
Kiefer Landfill
Sloughhouse, California

Emission Source	Regulated Air Pollutant	2021 Actual		2022 Actual		2023 Actual		2024 Actual		2025 Actual		2-Year Average	
		lb/yr	ton/yr	lb/yr	ton/yr	lb/yr	ton/yr	lb/yr	ton/yr	lb/yr	ton/yr	lb/yr	ton/yr
Engine No. 5	Nitrogen Oxides (NOx)	24,678	12.34	32,610	16.31	30,515	15.26	32,610	16.31	29,344	14.67	31,562	15.78
	Carbon Monoxide (CO)	124,205	62.10	178,536	89.27	167,065	83.53	161,374	80.69	214,920	107.46	172,800	86.40
	Reactive Organic Compounds (ROC)	6,002	3.00	12,151	6.08	11,370	5.69	9,566	4.78	12,678	6.34	11,761	5.88
	Particulate Matter (PM)	2,560	1.28	3,928	1.96	3,676	1.84	2,471	1.24	12,678	6.34	3,802	1.90
	Sulfur Oxides (SOx)	3,167	1.58	2,826	1.41	2,644	1.32	2,551	1.28	2,019	1.01	2,735	1.37
Flare No. 1	Nitrogen Oxides (NOx)	126	0.06	89	0.04	89	0.04	1,654	0.83	4,172	2.09	89	0.04
	Carbon Monoxide (CO)	23	0.01	0	0.00	0	0.00	0	0.00	5,915	2.96	0	0.00
	Reactive Organic Compounds (ROC)	30	0.01	3	0.002	3	0.002	28	0.01	17,850	8.93	3	0.002
	Particulate Matter (PM)	19	0.01	39	0.02	39	0.02	454	0.23	18	0.01	39	0.02
	Sulfur Oxides (SOx)	34	0.02	36	0.02	36	0.02	442	0.22	1,285	0.64	36	0.02
Flare No. 2	Nitrogen Oxides (NOx)	1,373	0.69	3,692	1.85	3,692	1.85	5,923	2.96	13,837	6.92	3,692	1.85
	Carbon Monoxide (CO)	680	0.34	3,039	1.52	3,039	1.52	2,830	1.42	13,217	6.61	3,039	1.52
	Reactive Organic Compounds (ROC)	144	0.07	182	0.09	182	0.09	858	0.43	21,376	10.69	182	0.09
	Particulate Matter (PM)	215	0.11	620	0.31	620	0.31	2,259	1.13	1,106	0.55	620	0.31
	Sulfur Oxides (SOx)	360	0.18	1,094	0.55	1,094	0.55	1,611	0.77	3,752	1.88	1,094	0.55
Total From All	Nitrogen Oxides (NOx)	118,626	59	156,413	78	144,569	72	123,330	62	111,244	56	150,491	75.25
Emission Points	Carbon Monoxide (CO)	599,345	300	806,905	403	829,830	415	680,989	340	615,136	308	818,368	409.18
	Reactive Organic Compounds (ROC)	30,882	15	51,894	26	45,739	23	31,075	16	65,504	33	48,817	24.41
	Particulate Matter (PM)	11,402	6	15,617	8	14,217	7	14,206	7	17,382	9	14,917	7.46
	Sulfur Oxides (SOx)	16,354	8	16,403	8	15,206	8	13,426	7	12,267	6	15,804	7.90

Note: Actual emissions based on Annual Emission Inventory Reports submitted to SMAQMD per CARB requirements.

Table 2
Scenario 2
Historical Actual and Proposed Potential to Emit Summary (RNG Plant Plus Up to Two Converted KLG Engines on Natural Gas)
Kiefer Landfill RNG
Sloughhouse, California

	Criteria Pollutant Emissions																	
	NOx			CO			PM-10			PM-2.5			SOx			VOCs		
Equipment	lb/hr	lbs/day	tons/yr	lb/hr	lbs/day	tons/yr	lb/hr	lbs/day	tons/yr	lb/hr	lbs/day	tons/yr	lb/hr	lbs/day	tons/yr	lb/hr	lbs/day	tons/yr
Current Permitted																		
Existing Landfill Gas Engines (KLG 1)	11.19	268.50	87.50	71.34	1,712.10	445.70	3.16	75.90	27.10	3.16	75.90	27.10	8.11	194.70	90.70	4.76	114.00	70.10
Existing Landfill Gas Engines (KLG 2)	7.46	179.00		47.56	1,141.40		2.11	50.60		2.11	50.60		5.41	129.80		3.17	76.00	
LFG Flare No. 1	9.00	216.00		30.00	720.00		2.20	52.90		2.20	52.90		12.72	305.30		10.56	253.40	
LFG Flare No. 2	6.00	144.00		18.00	432.00		1.76	42.30		1.76	42.30		4.80	115.20		3.29	78.90	
I.C. Engine (Driving Vacuum System and Brushes on Street Sweeper)	0.07	1.60	0.07	0.15	3.50	0.15	0.002	0.100	0.002	0.002	0.100	0.002	0.001	0.002	0.002	0.03	0.70	0.03
I.C. Engine (Driving Vacuum System and Brushes on Street Sweeper)	0.07	1.60	0.07	0.81	19.40	0.84	0.002	0.100	0.002	0.002	0.100	0.002	0.001	0.002	0.002	0.03	0.70	0.03
I.C. Engine Standby (Emergency Electric Generator)	3.64	87.30	0.36	3.15	75.70	0.32	0.18	4.30	0.020	0.180	4.300	0.020	0.006	0.100	0.001	1.38	33.20	0.14
Gasoline Dispensing Facility	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	0.05	0.51	0.09
TOTAL EMISSIONS	**37.42**	**898.00**	**88.00**	**171.01**	**4,104.10**	**447.01**	**9.42**	**226.20**	**27.12**	**9.42**	**226.20**	**27.12**	**31.05**	**745.10**	**90.70**	**23.27**	**557.41**	**70.39**
Current Actual (Engines Only)																		
Existing Landfill Gas Engines (KLG 1)	9.61	230.64	42.09	52.90	1,269.68	231.72	0.88	21.13	3.86	0.88	21.13	3.86	1.04	24.96	4.55	3.00	71.93	13.13
Existing Landfill Gas Engines (KLG 2)	7.14	171.31	31.26	40.17	964.09	175.95	0.75	17.93	3.27	0.75	17.93	3.27	0.64	15.25	2.78	2.55	61.31	11.19
LFG Flare No. 1	9.00	216.00	8.49	30.00	720.00	23.77	2.20	52.90	6.47	2.20	52.90	6.47	12.72	305.30	37.17	10.56	253.40	34.01
LFG Flare No. 2	6.00	144.00	5.66	18.00	432.00	14.26	1.76	42.30	5.17	1.76	42.30	5.17	4.80	115.20	14.03	3.29	78.90	10.59
I.C. Engine (Driving Vacuum System and Brushes on Street Sweeper)	0.07	1.60	0.07	0.15	3.50	0.15	0.002	0.100	0.002	0.002	0.100	0.002	0.001	0.002	0.002	0.03	0.70	0.03
I.C. Engine (Driving Vacuum System and Brushes on Street Sweeper)	0.07	1.60	0.07	0.81	19.40	0.84	0.002	0.100	0.002	0.002	0.100	0.002	0.001	0.002	0.002	0.03	0.70	0.03
I.C. Engine Standby (Emergency Electric Generator)	3.64	87.30	0.36	3.15	75.70	0.32	0.18	4.30	0.02	0.18	4.30	0.02	0.01	0.10	0.00	1.38	33.20	0.14
Gasoline Dispensing Facility	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	0.05	0.51	0.09
TOTAL EMISSIONS	**35.53**	**852.44**	**88.00**	**145.18**	**3,484.38**	**447.01**	**5.77**	**138.76**	**18.79**	**5.77**	**138.76**	**18.79**	**19.20**	**460.81**	**58.54**	**20.89**	**500.65**	**69.21**
Future Potential																		
Converted Natural Gas Engines (x2) (KLG)	0.43	10.36	1.89	1.23	29.59	5.40	1.13	27.06	4.94	1.13	27.06	4.94	0.09	2.06	0.38	0.62	14.79	2.70
LFG Flare No. 1 and/or No. 2 (1,000 scfm)	1.80	43.20	7.88	6.00	144.00	26.28	0.44	10.58	1.93	0.44	10.58	1.93	2.54	61.06	11.14	2.11	50.69	9.25
I.C. Engine (Driving Vacuum System and Brushes on Street Sweeper)	0.07	1.60	0.07	0.15	3.50	0.15	0.00	0.10	0.002	0.002	0.10	0.002	0.001	0.002	0.002	0.03	0.70	0.03
I.C. Engine (Driving Vacuum System and Brushes on Street Sweeper)	0.07	1.60	0.07	0.81	19.40	0.84	0.00	0.10	0.002	0.002	0.10	0.002	0.001	0.002	0.002	0.03	0.70	0.03
I.C. Engine Standby (Emergency Electric Generator)	3.64	87.30	0.36	3.15	75.70	0.32	0.18	4.30	0.02	0.18	4.30	0.02	0.01	0.10	0.001	1.38	33.20	0.14
Gasoline Dispensing Facility	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	0.05	0.51	0.09
Proposed Off-Specification Gas Process Flares (x2)	15.60	374.40	23.40	52.00	1,248.00	78.00	2.37	56.94	3.56	2.37	56.94	3.56	1.04	24.97	1.56	1.40	33.65	2.10
Proposed Thermal Oxidizer (includes supplemental fuel)	2.78	66.67	12.17	9.26	222.24	40.56	0.88	21.09	3.85	0.88	21.09	3.85	2.86	68.68	12.53	2.33	55.92	10.20
Proposed Natural Gas Emergency Generator Engine	0.21	4.92	0.02	0.82	19.68	0.08	0.03	0.81	3.37E-03	0.03	0.81	3.37E-03	2.00E-03	0.05	2.00E-04	0.21	4.92	0.02
TOTAL EMISSIONS	**24.58**	**590.05**	**45.86**	**73.42**	**1,762.11**	**151.63**	**5.04**	**120.98**	**14.30**	**5.04**	**120.98**	**14.30**	**6.54**	**156.91**	**25.62**	**8.16**	**195.08**	**24.57**

Emission Changes (tons per year)

Historical Actual to Potential to Emit (Actuals for Engines Only)	**-42.14**	**-295.38**	**-4.49**	**-4.49**	**-32.92**	**-44.64**
Potential to Emit to Potential to Emit	**-42.14**	**-295.38**	**-12.82**	**-12.82**	**-65.08**	**-45.82**

Table 3
Scenario 3
Historical Actual and Proposed Potential to Emit Summary (All LFG to RNG Facility)
Kiefer Landfill RNG
Sloughhouse, California

	Criteria Pollutant Emissions																	
	NOx			CO			PM-10			PM-2.5			SOx			VOCs		
Equipment	lb/hr	lbs/day	tons/yr	lb/hr	lbs/day	tons/yr	lb/hr	lbs/day	tons/yr	lb/hr	lbs/day	tons/yr	lb/hr	lbs/day	tons/yr	lb/hr	lbs/day	tons/yr
Current																		
Existing Landfill Gas Engines (KLG 1)	11.19	268.50	87.60	71.34	1,712.10	445.70	3.16	75.90	27.10	3.16	75.90	27.10	8.11	194.70	90.70	4.76	114.00	70.10
Existing Landfill Gas Engines (KLG 2)	7.46	179.00		47.56	1,141.40		2.11	50.60		2.11	50.60		5.41	129.80		3.17	76.00	
LFG Flare No. 1	9.00	216.00		30.00	720.00		2.20	52.90		2.20	52.90		12.72	305.30		10.56	253.40	
LFG Flare No. 2	6.00	144.00		18.00	432.00		1.76	42.30		1.76	42.30		4.80	115.20		3.29	78.90	
I.C. Engine (Driving Vacuum System and Brushes on Street Sweeper)	0.07	1.60	0.07	0.15	3.50	0.15	0.002	0.100	0.002	0.002	0.100	0.002	0.001	0.002	0.002	0.03	0.70	0.03
I.C. Engine (Driving Vacuum System and Brushes on Street Sweeper)	0.07	1.60	0.07	0.81	19.40	0.84	0.002	0.100	0.002	0.002	0.100	0.002	0.001	0.002	0.002	0.03	0.70	0.03
I.C. Engine Standby (Emergency Electric Generator)	3.64	87.30	0.36	3.15	75.70	0.32	0.18	4.30	0.020	0.180	4.300	0.020	0.006	0.100	0.001	1.38	33.20	0.14
Gasoline Dispensing Facility	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	0.05	0.51	0.09
TOTAL EMISSIONS	**37.42**	**898.00**	**88.00**	**171.01**	**4,104.10**	**447.01**	**9.42**	**226.20**	**27.12**	**9.42**	**226.20**	**27.12**	**31.05**	**745.10**	**90.70**	**23.27**	**557.41**	**70.39**
Current Actual (Engines Only)																		
Existing Landfill Gas Engines (KLG 1)	9.61	230.64	42.09	52.90	1,269.68	231.72	0.88	21.13	3.86	0.88	21.13	3.86	1.04	24.96	4.55	3.00	71.93	13.13
Existing Landfill Gas Engines (KLG 2)	7.14	171.31	31.26	40.17	964.09	175.95	0.75	17.93	3.27	0.75	17.93	3.27	0.64	15.25	2.78	2.55	61.31	11.19
LFG Flare No. 1	9.00	216.00	8.49	30.00	720.00	23.77	2.20	52.90	6.47	2.20	52.90	6.47	12.72	305.30	37.17	10.56	253.40	34.01
LFG Flare No. 2	6.00	144.00	5.66	18.00	432.00	14.26	1.76	42.30	5.17	1.76	42.30	5.17	4.80	115.20	14.03	3.29	78.90	10.59
I.C. Engine (Driving Vacuum System and Brushes on Street Sweeper)	0.07	1.60	0.07	0.15	3.50	0.15	0.00	0.10	0.00	0.00	0.10	0.00	0.00	0.00	0.00	0.03	0.70	0.03
I.C. Engine (Driving Vacuum System and Brushes on Street Sweeper)	0.07	1.60	0.07	0.81	19.40	0.84	0.00	0.10	0.00	0.00	0.10	0.00	0.00	0.00	0.00	0.03	0.70	0.03
I.C. Engine Standby (Emergency Electric Generator)	3.64	87.30	0.36	3.15	75.70	0.32	0.18	4.30	0.02	0.18	4.30	0.02	0.01	0.10	0.00	1.38	33.20	0.14
Gasoline Dispensing Facility	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	0.05	0.51	0.09
TOTAL EMISSIONS	**35.53**	**852.44**	**88.00**	**145.18**	**3,484.38**	**447.01**	**5.77**	**138.76**	**18.79**	**5.77**	**138.76**	**18.79**	**19.20**	**460.81**	**58.54**	**20.89**	**500.65**	**69.21**
Future Potential																		
LFG Flare No. 1 and/or No. 2 (1,000 scfm)	1.80	43.20	7.88	6.00	144.00	26.28	0.44	10.58	1.93	0.44	10.58	1.93	2.54	61.06	11.14	2.11	50.69	9.25
I.C. Engine (Driving Vacuum System and Brushes on Street Sweeper)	0.07	1.60	0.07	0.15	3.50	0.15	0.002	0.10	0.002	0.002	0.10	0.002	0.001	0.002	0.002	0.03	0.70	0.03
I.C. Engine (Driving Vacuum System and Brushes on Street Sweeper)	0.07	1.60	0.07	0.81	19.40	0.84	0.002	0.10	0.002	0.002	0.10	0.002	0.001	0.002	0.002	0.03	0.70	0.03
I.C. Engine Standby (Emergency Electric Generator)	3.64	87.30	0.36	3.15	75.70	0.32	0.18	4.30	0.02	0.18	4.30	0.02	0.01	0.10	0.001	1.38	33.20	0.14
Gasoline Dispensing Facility	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	0.05	0.51	0.09
Proposed Off-Specification Gas Process Flares (x2)	15.60	374.40	23.40	52.00	1,248.00	78.00	2.37	56.94	3.56	2.37	56.94	3.56	1.04	24.97	1.56	1.40	33.65	2.10
Proposed Thermal Oxidizer (includes supplemental fuel)	2.78	66.67	12.17	9.26	222.24	40.56	0.88	21.09	3.85	0.88	21.09	3.85	2.86	68.68	12.53	2.33	55.92	10.20
Proposed Natural Gas Emergency Generator Engine	0.21	4.92	0.02	0.82	19.68	0.08	0.03	0.81	3.37E-03	0.03	0.81	3.37E-03	0.002	0.048	2.00E-04	0.21	4.92	0.02
TOTAL EMISSIONS	**24.15**	**579.69**	**43.97**	**72.19**	**1,732.52**	**146.23**	**3.91**	**93.92**	**9.36**	**3.91**	**93.92**	**9.36**	**6.46**	**154.85**	**25.24**	**7.54**	**180.28**	**21.87**
Emission Changes (tons per year)																		
Historical Actual to Potential to Emit (Actuals for Engines Only)			**-44.03**			**-300.78**			**-9.43**			**-9.43**			**-33.30**			**-47.34**
Potential to Emit to Potential to Emit			**-44.03**			**-300.78**			**-17.76**			**-17.76**			**-65.46**			**-48.52**

Appendix A *In response to Comment 4-7, the following Energy Conversion to Greenhouse Gas Emissions Calculation Sheet has been added to Appendix A to clarify how the project's energy greenhouse gas emissions were calculated.*

Energy Conversion to Greenhouse Gas Emissions

Scenario	Natural Gas Use		Electricity Use	
	(MMcf/yr)	(Therms)	(kWh/yr)	(MWh/yr)
Existing Generation	-	-	-	93,578
Existing Consumption	-	-	-	9,216
Net Total Energy	-	-	-	**-84,362**
MTCO2e	-	-	-	***-13,623***
MTCO2e Total	-	-	-	
RNG Plant Generation	1,800	18,684,000	-	37,431
RNG Plant Consumption	880	9,134,400	-	87,600
Net Total Energy	**-920**	**-9,549,600**	-	**50,169**
MTCO2e	-	***-50,613***	-	***8,101***
MTCO2e Total	***-42,512***			

Notes:

Energy generation and consumption provided by project Applicant.

MTCO2e electricity calculated based on Sacramento Municipal Utility District Power Content Label, 356 lbs of CO_2e emitted per MWh, available at: https://www.smud.org/SMUDPCL

MTCO2e natural gas calculated based on 0.0053 metric tons CO2e/therm from US EPA, Greenhouse Gas Equivalencies Calculator - Calculations and References, available at: https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator-calculations-and-references

Conversions

1 MMcf =	1,000,000	cf
1 cf =	1,038	BTU
1 therm =	100,000	BTU
1 lb =	0.000453592	metric tons

RESPONSE TO COMMENTS

During the public review period, a total of seven comment letters were received on the Draft IS/MND. The written comment letters received on the Draft IS/MND are listed in Table 1 below. In Table 1 the comments and associated responses are grouped in agencies and interested parties lists and are arranged chronologically by the date on which the comment letter was received. Each letter has been assigned a number code, and individual comments in each letter have also been coded to facilitate the responses. For example, the letter from the Central Valley Flood Protection Board is identified as Comment Letter 2, with the individual comments within the letter identified as 2-1, 2-2, and so on. Copies of each comment letter are provided prior to the response to each letter. Comments that raise issues not directly related to the substance of the environmental analysis in the Draft IS/MND are noted but, in accordance with CEQA, did not receive a detailed response.

Table 1: List of Written Comment Letters Received in Response to the Draft IS/MND

Letter #	Agency/Interested Party	Date	Page #(s) of Response
State and Local Agencies			
1	California Department of Transportation (Caltrans) District 3	June 15, 2026	25
2	Central Valley Flood Protection Board (CVFPB)	June 15, 2026	29
3	California Department of Fish and Wildlife (CDFW)	July 10, 2026	44-46
4	Sacramento Metropolitan Air Quality Management District (SMAQMD)	July 13, 2026*	53-56
5	Sacramento Municipal Utility District (SMUD)	July 15, 2026*	60
Interested Parties			
6	Avdis & Cucchi, LLP on behalf of Anatolia Marketplace, LLC	July 13, 2026*	75
7	Adams Broadwell Joseph & Cardozo on behalf of Citizens for Responsible Industry	July 27, 2026*	106-112

*Comment received after initial public review period

COMMENT LETTER NO. 1: CALIFORNIA DEPARTMENT OF TRANSPORTATION DISTRICT 3

From: Spence, Robynn L@DOT <robynn.spence@dot.ca.gov> **On Behalf Of** D3 Local Development@DOT
Sent: Monday, June 15, 2026 3:03 PM
To: Newton. Julie <newtonj@saccounty.gov>
Cc: Smith, David@DOT <David.J.Smith@dot.ca.gov>
Subject: Caltrans District 3 LDR Response: Kiefer Landfill Gas Utilization Project/SCH#202606539

Good afternoon Julie,

Thank you for including the California Department of Transportation in the review process for the Kiefer Landfill Gas Utilization Project/SCH#202606539. We wanted to reach out and let you know that we have no comments at this time.

Please provide our office with copies of any further actions regarding this proposal. We would appreciate the opportunity to review and comment on any changes related to this development. 1-1

Should you have questions please contact me, Local Development Review and System Planning Coordinator, by phone (530) 812-6874 or via email at D3.local.development@dot.ca.gov.

Thank you.

Respectfully,
Robynn Spence
Local Development Review and Complete Streets
Division of Planning, Local Assistance, and Sustainability
California Department of Transportation, District 3
(530) 812-6874
Schedule: M-F, 7am-3:30pm
In Office: M & W | Telework: Tu, Th, & F

LETTER NO. 1: CALTRANS DISTRICT 3

RESPONSE 1-1

The commenter notes that Caltrans reviewed the Draft IS/MND for the project and has no comments at this time. No further response to this comment is required.

COMMENT LETTER NO. 2 – CENTRAL VALLEY FLOOD PROTECTION BOARD

Docusign Envelope ID: 95026B63-79F2-8DCA-8383-C096CC8A0BC2

STATE OF CALIFORNIA – CALIFORNIA NATURAL RESOURCES AGENCY GAVIN NEWSOM, GOVERNOR

CENTRAL VALLEY FLOOD PROTECTION BOARD
3310 El Camino Ave., Ste. 170
SACRAMENTO, CA 95821
(916) 574-0609

June 15, 2026

Julie Newton
Environmental Coordinator
Sacramento County, Planning and Environmental Division
827 7th Street, Room 225
Sacramento, California 95814
CEQA@saccounty.gov

Subject: Comments for the Draft Mitigated Negative Declaration, Kiefer Landfill Gas Utilization Project, SCH# 2026060539, Sacramento County

Dear Julie Newton,

The Central Valley Flood Protection Board (Board) appreciates the opportunity to comment on the Draft Mitigated Negative Declaration for the proposed Kiefer Landfill Gas Utilization Project (proposed project).

The proposed project includes installing a pipeline below Morrison Creek using horizontal directional drilling. Morrison Creek is a regulated stream that is within the Board's permitting authority. Therefore, a Board permit may be required. Board permit information, including information on how to schedule a pre-application meeting with Board staff, is available on the Permitting at the Central Valley Flood Protection Board website. 2-1

Please include the Central Valley Flood Protection Board permit regulatory setting under heading **Other Public Agencies Whose Approval is Required** (page IS-10), if it determined that a Board permit is required for the proposed project. 2-2

California Code of Regulations, Title 23, Waters, Division 1 (Title 23) provides standards that govern the design and construction of projects that affect the flood control works and floodways. Board staff recommends that you review Title 23 Standards, including Sections 112 (Streams Regulated and Nonpermissible Work Periods), 123 (Pipelines, Conduits, and Utility Lines), and 124 (Abandoned Pipelines and Conduits). Any modification to the flood control works or floodways, and any deviation or variation from the standards will require approval from the Board. 2-3

Responsibility of the Board
The Board is the State's regulatory agency responsible for enforcing appropriate standards for the construction, maintenance, and operation of the flood control system that protects life, property, and habitat in California's Central Valley. 2-4

Docusign Envelope ID: 95026B63-79F2-8DCA-8383-C096CC8A0BC2

The Board operates under authorities as described in California Water Code (Water Code), which requires the Board to oversee future modifications or additions to facilities of the State Plan of Flood Control (SPFC). 2-4 Cont d

Board Permit

Per Title 23, Section 6, approval by the Board is required for all proposed work or uses, including the alteration of levees within any area for which there is an Adopted Plan of Flood Control within the Board's jurisdiction. In addition, Board approval is required for all proposed encroachments within a floodway, on adjacent levees, and within any Regulated Stream identified in Title 23, Table 8.1. Specifically, Board jurisdiction includes the levee section, the waterward area between project levees, a minimum 10-foot-wide strip adjacent to the landward levee toe, the area within 30 feet from the top of bank(s) of Regulated Streams, and inside the Board's Designated Floodways. Activities outside of these limits which could adversely affect Federal-State flood control facilities, as determined by the Board, are also under the Board's jurisdiction. Permits may also be required for existing unpermitted encroachments or where it is necessary to establish the conditions normally imposed by permitting, including where responsibility for the encroachment has not been clearly established or ownership or uses have been changed. 2-5

Flood Impacts Analysis

Pursuant to Title 23, Section 15, the Board may deny a Board permit if the proposed project could:

- Jeopardize directly or indirectly the physical integrity of levees or other works,
- Obstruct, divert, redirect, or raise the surface level of design floods or flows, or the lesser flows for which protection is provided,
- Cause significant adverse changes in water velocity or flow regimen,
- Impair the inspection of floodways or project works,
- Interfere with the maintenance of floodways or project works,
- Interfere with the ability to engage in flood fighting, patrolling, or other flood emergency activities,
- Increase the damaging effects of flood flows,
- Be injurious to, or interfere with, the successful execution, functioning, or operation of any adopted plan of flood control, or
- Adversely affect the State Plan of Flood Control, as defined in the California Water Code

2-6

The Board, as a Responsible Agency under the California Environmental Quality Act (CEQA), will review and consider the environmental effects of the proposed project identified in the Draft Mitigated Negative Declaration, and will reach its own conclusions on whether and how to approve the project involved (14 CCR 15096, subd. (a)). This includes direct impacts to facilities under construction, as well as indirect impacts from the proposed project to surrounding facilities. Accordingly, the comments herein are intended to assist in the development of a robust CEQA document capable of supporting the Board's permitting process.

Closing

The potential risks to public safety, including increased flood risks, need to be considered when developing proposed projects that seek to modify flood control works or the hydrology of the 2-7

Docusign Envelope ID: 95026B63-79F2-8DCA-8383-C096CC8A0BC2

water ways. Board staff is available to discuss any questions you have regarding the above comments. Please contact Jordan Robbins at (916) 524-3454, or via email at Jordan.Robbins@cvflood.ca.gov if you have any questions. 2-7 Cont'd

Sincerely,

Jamie Silva

Jamie Silva
Environmental Program Manager

cc: Office of Land Use and Climate Innovation
State.Clearinghouse@lci.ca.gov

Steve Lamb
Steve.Lamb@cvflood.ca.gov

LETTER NO. 2: CENTRAL VALLEY FLOOD PROTECTION BOARD

RESPONSE 2-1

The comment includes introductory remarks and notes that horizontal directional drilling below Morrison Creek is proposed as part of the project. The comment expresses that a permit from the Central Valley Flood Protection Board (Board) may be required for this activity. The potential need for a permit is noted. No further response to this comment is required.

RESPONSE 2-2

The commenter requests that the Central Valley Flood Protection Board permit be included under the "Other Public Agencies Whose Approval is Required" section, if it is determined that an Encroachment permit is required. The commenter is referred to the *Errata to the Draft IS/MND*, which includes the addition of the Central Valley Flood Protection Encroachment permit to this section.

RESPONSE 2-3

The commenter refers to California Code of Regulations and states that any modifications to the flood control works or floodways will require Board approval. The proposed project would be designed and constructed in accordance with the California Code of Regulations. Additionally, as mentioned in Response 2-2 above, the "Other Public Agencies Whose Approval is Required" section has been updated to reflect the Encroachment permit.

RESPONSE 2-4

The commenter states that the Board is responsible for enforcing appropriate flood control system and operates under the Water Code. This comment is noted. No further response to this comment is required.

RESPONSE 2-5

The commenter states that approval is required for all proposed work or uses including levee alteration and proposed encroachments. As mentioned in Response 2-2 above, the "Other Public Agencies Whose Approval is Required" section has been updated to reflect the Encroachment permit.

RESPONSE 2-6

This comment identifies reasons that the Board may deny a permit. The comment also states the role of the Board as a Responsible Agency, the CEQA document's role in supporting the Board's permitting process, the Board's intention to reach its own conclusions, and the intent of the Board's comments to assist in the development of a robust CEQA document capable of supporting the Board's permitting process. Comments are noted. No further response to this comment is required.

RESPONSE 2-7

This comment includes closing remarks. No further response to this comment is required.

COMMENT LETTER NO. 3 – CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE

From: Shun, Michael@Wildlife <Michael.Shun@Wildlife.ca.gov>
Sent: Friday, 10 July, 2026 13:21
To: Newton. Julie <newtonj@saccounty.gov>; PER-CEQA <CEQA@saccounty.gov>
Cc: Wildlife R2 CEQA <R2CEQA@wildlife.ca.gov>; Tran, Harvey@Wildlife <Harvey.Tran@Wildlife.ca.gov>; Wood, Dylan@Wildlife <Dylan.Wood@wildlife.ca.gov>
Subject: Kiefer Landfill Gas Utilization Project (SCH No. 2026060539)

Dear Julie Newton:

The California Department of Fish and Wildlife (CDFW) received and reviewed the Notice of Intent to Adopt an MND from Sacramento County for the Kiefer Landfill Gas Utilization Project (Project) pursuant the California Environmental Quality Act (CEQA) statute and guidelines.[1]

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish, wildlife, native plants, and their habitat. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may need to exercise its own regulatory authority under the Fish and Game Code.

CDFW ROLE

3-1

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (Fish & G. Code, § 1802.) Similarly for purposes of CEQA, CDFW provides, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW may also act as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration

regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the project proponent may seek related take authorization as provided by the Fish and Game Code.

3-1 Cont'd

PROJECT DESCRIPTION SUMMARY

The Project is located at 12701 Kiefer Boulevard, Sloughhouse, CA 95683, approximately 0.6 miles southeast of the intersection of Grant Line Road and Kiefer Boulevard; Assessor Parcel Numbers (APNs) 126-0090-020-0000, 126-0090-021-0000, 126-090-021-
0000, 126-0090-020-0000, 067-0030-078-0000, 067-0030-079-0000, and 067-2370-018-0000.

The Project consists of the construction of a renewable natural gas (RNG) plant with a capacity of 8,000 standard cubic feet per minute (scfm) at Kiefer Landfill and a pipeline connecting the plant to existing Pacific Gas & Electric (PG&E) natural gas pipelines in Sacramento County. The RNG plant would process landfill gas to meet air quality standards and produce pipeline-quality natural gas (i.e., primarily methane) by removing moisture and impurities. The proposed project would also construct a new pipeline to transfer the pipeline-quality RNG from the plant to existing PG&E pipeline infrastructure, with two route options under evaluation.

3-2

Pipeline Routes would be located within the public rights-of-way and/or private easements and run northwest from Kiefer Landfill along Kiefer Boulevard either to the intersection of Kiefer Boulevard/Rancho Cordova Parkway or to the intersection of Kiefer Boulevard/Sunrise Boulevard, then north along Sunrise Boulevard where it would terminate in the vicinity of the intersection of Sunrise Boulevard/Douglas Road. Either a compressor station would be constructed near the intersection of Douglas Road and Sunrise Boulevard to connect existing PG&E distribution and transmission pipelines or a metering and regulating (M&R) station may be constructed in the vicinity of the PG&E interconnect on Douglas Boulevard depending on the pipeline route.

The Project description should include the whole action as defined in the CEQA Guidelines section 15070 and should include appropriate detailed exhibits disclosing the Project area including temporary impacted areas such as equipment staging areas, spoils areas, adjacent infrastructure development, and access and haul roads if applicable.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist Sacramento County in adequately identifying and, where appropriate, mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the document. Based on the Project's avoidance of significant impacts on

3-3

biological resources with implementation of mitigation measures, CDFW concludes that a Mitigated Negative Declaration is appropriate for the Project.

CDFW is primarily concerned with the project impacts to stream systems including both the aquatic resource itself and associated riparian vegetation, Crotch's bumble bee (*Bombus crotchii*) (CBB), burrowing owl (*Athene cunicularia*) (BUOW), nesting birds, Western Spadefoot (WES), and restoring temporarily disturbed areas with pollinator friendly plants. 3-3 Cont'd

Comment 1: Lake and Streambed Alteration

Issue: The MND should identify all perennial, intermittent, and ephemeral rivers, streams, lakes, other hydrologically connected aquatic features, and any associated biological resources/habitats present within the entire Project footprint (including utilities, access and staging areas). The MND should analyze all potential temporary, permanent, direct, indirect and/or cumulative impacts to the above-mentioned features and associated biological resources/habitats that may occur because of the Project including but not limited to Horizontal Directional Drilling (HDD), removal of riparian vegetation, or temporarily diverting water for project buildout. Additionally, the MND should expand on each project activity that may substantially alter or impact Blodgett Reservoir, Laguna Creek, Morrison Creek, or the unnamed tributaries to Deer, Laguna, Morrison Creeks and include those project activities in the Lake and Streambed Alteration (LSA) Agreement notification.

Recommendation or Recommended Mitigation Measure: If it is determined the Project will result in significant impacts to these resources the MND shall propose appropriate avoidance, minimization and/or mitigation measures to reduce impacts to a less-than-significant level and notify CDFW to obtain a Streambed Alteration Agreement if any Project related activities may be subject to Section 1062 of the Fish and Game Code. 3-4

Section 1602 of the Fish and Game Code requires an entity to notify CDFW prior to commencing any activity that may do one or more of the following:

1. Substantially divert or obstruct the natural flow of any river, stream or lake;
2. Substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or
3. Deposit debris, waste or other materials where it may pass into any river, stream or lake.

Please note that "any river, stream or lake" includes those that are episodic (i.e., those that are dry for periods of time) as well as those that are perennial (i.e., those that flow year-round). This includes ephemeral streams and watercourses with a subsurface flow. It may also apply to work undertaken within the flood plain of a body of water.

If upon review of an entity's notification, CDFW determines that the Project activities may substantially adversely affect an existing fish or wildlife resource, a LSA

Agreement will be issued which will include reasonable measures necessary to protect the resource. CDFW's issuance of an LSA Agreement is a "project" subject to CEQA (see Pub. Resources Code 21065). To facilitate issuance of an LSA Agreement, if one is necessary, the MND should fully identify the potential impacts to the lake, stream, or riparian resources, and provide adequate avoidance, mitigation, and monitoring and reporting commitments. Early consultation with CDFW is recommended, since modification of the Project may avoid or reduce impacts to fish and wildlife resources. All LSA Notification types must be submitted online through CDFW's Review/EPIMS Permit Information Management System (EPIMS). For more information about EPIMS, please visit https://wildlife.ca.gov/Conservation/Environmental-Review/EPIMS. More information about LSA Notifications, paper forms and fees may be found at https://www.wildlife.ca.gov/Conservation/Environmental-Review/LSA.

Please note that other agencies may use specific methods and definitions to determine impacts to areas subject to their authorities. These methods and definitions often do not include all the information needed for CDFW to determine the extent of fish and wildlife resources affected by activities subject to Notification under Fish and Game Code section 1602. Therefore, CDFW does not recommend relying solely on methods developed specifically for delineating areas subject to other agencies' jurisdiction (such as United States Army Corps of Engineers) when mapping lakes, streams, wetlands, floodplains, riparian areas, etc. in preparation for submitting a Notification of an LSA.

3-4 Cont'd

CDFW relies on the lead agency MND analysis when acting as a responsible agency issuing an LSA Agreement. CDFW recommends lead agencies coordinate with us as early as possible, since potential modification of the proposed Project may avoid or reduce impacts to fish and wildlife resources and expedite the Project approval process.

The following information will be required for the processing of an LSA Notification and CDFW recommends incorporating this information into any forthcoming CEQA document(s) to avoid subsequent documentation and Project delays:

1. Mapping and quantification of lakes, streams, and associated fish and wildlife habitat (e.g., riparian habitat, freshwater wetlands, etc.) that will be temporarily and/or permanently impacted by the Project, including impacts from access and staging areas. Please include an estimate of impact to each habitat type.

Discussion of specific avoidance, minimization, and mitigation measures to reduce Project impacts to fish and wildlife resources to a less-than-significant level. Please refer to section 15370 of the CEQA Guidelines.

COMMENT 2: Crotch's bumble bee, Mitigation Measure BIO-3: Crotch's Bumble Bee Avoidance, page number IS-58

Issue: CBB are designated as a state candidate species under CESA, and the Project site is located within CBB's historic range. Recent survey results have shown them to be present throughout San Joaquin, Sacramento, and Calaveras Counties. CBB was historically common in the Central Valley of California but now appears to

3-5

be absent from most of it, especially in the center of its historic range (Hatfield et al. 2014). The primary threat to CBB populations in California continues to be habitat loss, especially the loss of suitable foraging habitat. Agricultural intensification, livestock grazing, urban development, as well as other habitat modifications, can jeopardize the habitat needs of bumble bees and lead to the fragmentation of habitat into pieces that are too small or too distant to support diverse bumble bee communities (Goulson et al. 2008). Additionally, herbicides are often used with invasive weed management and can be more cost effective than other management methods. However, the use of herbicides to control weeds can indirectly harm pollinators through the removal of flowers that once provided them with pollen and nectar resources (Williams 1986, Shepherd et al. 2003, Pleasants & Oberhauser 2013).

In June 2019, the California Fish and Game Commission granted CBB candidate species protection under CESA. The candidacy designation temporarily affords CBB broad CESA protections (including prohibitions against "take" without permit authorization) throughout the entirety of California while CDFW conducts a species status review to confirm whether (and where) listing is warranted and to recommend management and recovery actions. Construction and operation and maintenance activities including but not limited to ground disturbance, noise, fugitive dust, human presence, herbicide application, and/or night lighting could result in significant impacts to nesting or foraging CBB during project activities. Projects with potential impacts to CBB are encouraged to avoid take or to obtain an ITP from CDFW.

Recommendation or Recommended Mitigation Measure: CDFW recommends the following CBB mitigation measure (MM) be revised to the following (additions are noted in **bold** while deletions are noted in ~~strikethough~~):

3-5 Cont'd

Regardless of the feasibility of the above limited operating period, a qualified biologist familiar with bumble bees of California and experienced using survey methods for bumble bees shall conduct a ~~habitat assessment and focused survey~~ **Protocol Survey** for Crotch's bumble bee before the start of any ground-disturbing activities. Surveys shall be performed when Crotch's bumble bee is most likely to be identified, typically from ~~April through August~~ **March 1 through October 31** (i.e., the colony active period) when floral resources and ideal weather conditions are present, and shall follow the methods in Survey Considerations for CESA Candidate Bumble Bee Species. Surveys shall be conducted during the colony active period closest to the start of planned construction activities. Survey results shall be submitted to the project applicant and Sacramento County no less than 7 days before construction begins.

- **Crotch's Bumble Bee Protocol Survey. If Project activities are proposed to occur during the active season for CBB, Project Proponent shall develop a Pre-Construction Survey Plan for CBB and submit it to Sacramento County for acceptance, developed in coordination with CDFW (see https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150&inline). A total of three surveys shall be conducted prior to any ground-disturbing Project activities or vegetation removal that will take place during the**

active season for CBB (March 1 through October 31), or until all flowering vegetation is largely desiccated, to determine if any active nests are within the Project Area. Each survey shall be spaced two to four weeks apart, unless otherwise authorized in writing by Sacramento County in coordination with CDFW, with the last survey taking place within 72 hours prior to construction activity. A Qualified Biologist shall perform meandering transects through the planned construction footprint, plus a 50-foot buffer where accessible, between 9:00 am and 1:00 pm where feasible and at least one hour after sunrise and at least two hours before sunset, to visually survey the area for CBB activity. The duration of the survey will be the minimum amount of time necessary to adequately survey the area, typically at least one hour of surveying per three acres of potential habitat, excluding capture, chilling, photo, identification, and release time. For each sampling event, the Qualified Biologist shall survey suitable habitat using non-lethal photo voucher and netting methods, developed in coordination with CDFW (see https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150&inline). If a suspected or confirmed CBB is identified during any of these surveys, the Qualified Biologist shall notify Sacramento County within 48 hours.

3-5 Cont'd

If only foraging CBB or CBB nests are observed, a no-disturbance buffer of at least 50 feet shall be established and the project proponent shall consult with Sacramento County and CDFW to demonstrate compliance with CESA.

- ~~The project applicant shall submit a survey report to CDFW within 1 month of survey completion and shall notify CDFW and Sacramento County within 24 hours if Crotch's bumble bees are detected.~~

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- ~~If Crotch's bumble bees are detected during the focused survey, appropriate avoidance measures shall be implemented. Avoidance measures shall include, but not be limited to, the following:~~

    - ~~Protective buffers shall be implemented around active nesting colonies until these sites are no longer active. A qualified biologist, in coordination with CDFW, shall determine the appropriate buffer size to protect nesting colonies; however, the buffer shall be a minimum of 50 feet.~~

COMMENT 3: Burrowing Owl, Mitigation Measure BIO-5: Burrowing Owl, page number IS-59

3-6

Issue: BUOW are designated as a state candidate species under CESA and the Project site is located within 1-mile of a known BUOW occurrence on CNDDB. BUOW

have suffered significant habitat loss due to large-scale development, including wind and solar energy infrastructure development, and from the killing and removal of mammals during significant grading activities whose underground burrows the owls use for nesting.

In October 2024, the California Fish and Game Commission granted BUOW candidate species protection under CESA. The candidacy designation temporarily affords BUOW broad CESA protections (including prohibitions against "take" without permit authorization) throughout the entirety of California while CDFW conducts a species status review to confirm whether (and where) listing is warranted and to recommend management and recovery actions. BUOW has additional protection under the Migratory Bird Treaty Act and Section 3503.5 of the Fish and Game Code; therefore, impacts may be considered potentially significant unless adequate mitigation is incorporated. Projects with potential impacts to BUOW are encouraged to avoid take or to obtain an ITP from CDFW.

Recommendation or Recommended Mitigation Measure: CDFW recommends the following BUOW MM be revised to the following (additions are noted in **bold** while deletions are noted in ~~strikethough~~):

~~Burrowing Owl Surveys. Project proponent shall conduct a burrowing owl survey over all~~
~~suitable habitat present within Project area. Burrowing owl surveys shall be conducted by a qualified biologist in accordance with the protocol described in the Staff Report on Burrowing Owl Mitigation (CDFW, March 7, 2012). If possible, Surveys should be conducted during both the breeding (February 1 – August 31) and non-breeding seasons (September 1 – January 31) immediately preceding the planned start of construction activities to ascertain the seasonal residency status of any owls occupying the site. The presence of burrowing owl or their sign anywhere on the site or within a 500-foot 1650-foot accessible radius around the project site shall be recorded and mapped. Surveys shall disclose all burrows and occurrence of sign of burrowing owl on the project site and within the 500-foot 1650-foot buffer. Results of the survey shall be submitted to the County.~~

3-6 Cont'd

Burrowing Owl Surveys. Prior to beginning ground-disturbing Project activities, a Qualified Biologist shall conduct at least four surveys using the methods described in most recent guidelines from CDFW's *Staff Report on Burrowing Owl Mitigation*, *Appendix D* (2012). Surveys shall be conducted during the breeding season (February 1 to August 31) and include no fewer than four survey visits: at least one site visit between February 15 and April 15 and a minimum of three survey visits, at least three weeks apart, between April 15 and July 15, with at least one visit after June 15. Surveys shall also be conducted during the non-breeding season (September 1 to January 31) before the start of construction activities to determine seasonal residency. Non-breeding season surveys shall consist of at least four visits, spread evenly, throughout the nonbreeding season. The presence of BUOW individuals, burrow complexes, or their sign (e.g., molted feathers, cast pellets, prey remains, eggshell fragments, owl whitewash, nest burrow decoration materials,

etc.) anywhere onsite or within a 1650-foot accessible radius around the Project Area shall be recorded and mapped. The Qualified Biologist shall submit the results of the survey to Sacramento County prior to beginning Project activities. If changes in BUOW presence are detected (e.g., BUOW have moved onsite or changed burrow use), the Qualified Biologist shall contact Sacramento County by phone or email within 24 hours of the observation to consult on appropriate measures to avoid impacts of the Project to BUOW and the Qualified Biologist shall establish no-disturbance buffers. The Qualified Biologist could modify the nest buffer with written approval from Sacramento County in coordination with CDFW.

Burrowing Owl Take Avoidance. During the breeding season (February 1 to August 31), surveys shall document whether burrowing owl are nesting in or within ~~500 feet~~ **1650 feet** of the project area. During the non-breeding season (September 1 to January 31), surveys shall document whether burrowing owl are using habitat in or directly adjacent to any area to be disturbed. Survey results shall only be valid for the season (breeding or nonbreeding) during which the survey was conducted. If a lapse in project-related work of fifteen (15) calendar days or longer occurs, another focused survey and consultation with the County and CDFW shall be required before project work can be reinitiated. If a burrowing owl or evidence of presence at or near a burrow entrance is found to occur within ~~500 feet~~ **1650 feet** of the project site, the following measures shall be implemented:

3-6 Cont'd

- If burrowing owl are found during the non-breeding season (approximately September 1 to January 31), the ~~project applicant~~ **qualified biologist** shall establish a ~~minimum 160-foot (50-meter)~~ **no-disturbance** buffer zone around active burrows. The buffer zone shall be flagged or otherwise clearly marked. Measures such as visual screens may be used to further reduce the buffer with CDFW approval and provided a qualified biologist confirms that such measures do not cause agitated behavior.

- If burrowing owl are found during the breeding season (approximately) February 1 to August 31), the project applicant shall:

    - Avoid all nest sites that could be disturbed by project construction during the remainder of the breeding season or while the nest is occupied by adults or young (occupation includes individuals or family groups foraging on or near the site following fledging).

    - Establish a minimum ~~500-foot~~ **1650-foot** non-disturbance buffer zone around nests, unless otherwise approved by the County in writing, in consultation with CDFW. The buffer zone shall be flagged or otherwise clearly marked. Should construction activities cause the nesting bird to vocalize, make defensive flights at intruders, or otherwise display agitated behavior, then the exclusionary buffer will be increased such that activities

are far enough from the nest so that the bird(s) no longer display this agitated behavior. Construction shall only occur within the buffer zone during the breeding season if a qualified biologist monitors the nest and determines that the activities do not disturb nesting behavior, or the birds have not begun egg-laying and incubation, or that the juveniles from the occupied burrows have fledged and moved off site. Any modifications to this buffer shall be approved by the County, in consultation with CDFW prior to its implementation. The buffer reduction request shall include relevant information and/or propose new measures to justify the buffer reduction. The buffer area must be clearly marked to prevent project-related activities from occurring within the buffer zone.

3-6 Cont'd

COMMENT 4: Nesting Birds, MM BIO-6: Nesting Bird Protection, page number IS-61

Issue: The MND states that the Project will survey for nesting birds during active periods. However, due to the large size of the project footprint, MM BIO-6 may not adequately protect nesting birds throughout the entire Project footprint during their active season.

Recommendation or Recommended Mitigation Measure: CDFW recommends the following nesting bird protection MM be revised to the following (additions are noted in bold while deletions are noted in ~~strikethough~~):

- If construction is proposed during the nesting season (February 1 to September 15, inclusive), a survey for nesting birds shall be conducted by a qualified biologist within seven days prior to the onset of ground disturbing activities to identify any active nests (i.e., nests containing eggs and/or young) of migratory and/or non-raptor bird species. Surveys will be performed for the project site, vehicle and equipment staging areas, and suitable habitat within **¼-mile for raptors and 500 feet for all other nesting birds** of the project site to locate any active migratory bird nests. If project related work does not commence within seven days, or if there is a lapse in construction activities totaling seven days or more, additional surveys will be required.

- If no active nests are identified during the survey period, or if development is initiated during the non-breeding season, construction may proceed with no restrictions.

- If active nests are found, an adequate no-disturbance buffer shall be established around the nest location and construction activities shall be restricted within the buffer until a qualified biologist has confirmed that any young birds have fledged and are able to leave the construction area. Required

3-7

setback distances for the no-disturbance buffer will be established by the qualified biologist and may vary depending on the species, line-of sight between the nest, and the construction activity, and the birds' sensitivity to disturbance. As necessary, the no-disturbance zone will be fenced with temporary orange construction fencing, high visibility rope, or a similar visual barrier if construction is to be initiated on the remainder of the development site. The buffer shall be kept in place until after the breeding nesting season or until a qualified biologist confirms the young have fledges, are foraging independently, and the nest is no longer active for the season.

3-7 Cont'd

- Should birds nesting within the project site and survey buffers during construction activities begin to show disturbance associated with construction activities, no-disturbance buffers shall be established as determined by the qualified wildlife biologist.

- A report of findings will be prepared by the qualified biologist and submitted to the County for review and approval prior to initiation of construction within the no-disturbance zone during the nesting season. The report will either confirm absence of any active nests or will confirm that any young within a designated no-disturbance zone have fledged and construction can proceed.

COMMENT 5: Western Spadefoot Toad

Issue: The California Fish and Game Commission received a petition on September 24, 2025, to list WES as a candidate species under CESA and the Project site is located within 1-mile of a known WES occurrence on CNDDB. If the determination to designate WES is made by the Fish and Game Commission, WES would be given a candidacy designation, which affords temporary broad CESA protections (including prohibitions against "take") throughout the entirety of California while CDFW conducts a species status review to confirm whether (and where) listing is warranted and to recommend management and recovery actions. WES are most often associated with grasslands, but must be connected to suitable breeding habitat, which includes seasonal water bodies like vernal pools and intermittent streams, though they have also been found to breed in reservoirs, irrigation ditches, stock ponds, and even road ruts (Morey, 2005; Stebbins, 2003). Because of their biphasic life cycle, WESs require aquatic breeding habitat connected to terrestrial over-summering habitat. Anthropogenic habitat loss and degradation are some of the biggest threats to amphibian populations worldwide, currently impacting 88% of threatened amphibian species (Baillie et al., 2004; Cushman, 2006; Sodhi et al., 2008; Willson & Dorcas, 2003). Human activities such as urban and agricultural development, deforestation, and draining of wetlands are primary mechanisms of habitat loss (Gallant et al., 2007; Grant et al., 2016).

3-8

Recommendation or Recommended Mitigation Measure: CDFW recommends that the MND includes the following WES measures prior to initiation of construction

activities:

- Habitat Evaluation and Delineation. Prior to initiating Project activities, a Qualified Biologist shall conduct a habitat evaluation to determine the likelihood (low, moderate, or high) of WES occurring within the proposed Project Area footprint. Habitat evaluations shall consider historic and existing land uses of the Project Area, proximity to known or potential breeding sites, existing quality of upland habitat, barrier(s) to WES movement between suitable upland and/or aquatic habitat and the proposed Project Area, and other conditions pertinent to WES occupation, as well as project-specific mitigation measures.

  If the evaluation concludes that WES have a moderate to high likelihood of occurring within the Project Area, Sacramento County shall be consulted in coordination with CDFW and USFWS. CDFW recommends that the consultation consider the size and configuration of the Project Area, and whether a pre-construction drift fence, audio detection, and/or larval surveys are advisable to ensure that a proper assessment of impacts to WES is conducted. Because WES use aquatic and upland habitats during their life cycle, they may be present in either or both habitats on a given property. For sites with suitable breeding habitat, two consecutive seasons of negative larval surveys is recommended to support a negative finding. For sites with no suitable aquatic breeding habitat within 0.5 miles of the work site, but where suitable upland habitat exists, two consecutive seasons of negative upland drift fence studies are recommended to support a negative finding.

- Artificial Lighting - Night. Permittee shall minimize, to the extent feasible, permanent or temporary, fixed, exterior lighting, including motion-triggered security lighting that casts light on WES habitat beyond the Project Area between sunset and sunrise. Nighttime construction lighting shall be shielded and oriented downward to minimize effects on any nearby WES habitat.

3-8 Cont'd

COMMENT 6: Pollinators

Issue: The MND should include measures to increase use by pollinators such as dual use farming. The Project should be designed to optimize a balance between electrical generation and agricultural production (Jossi 2018) or native plants. Native plantings or dual use farming techniques provide additional foraging resources for pollinator species including but not limited to CBB and for other native species by increasing the amount of nectar resources on a local level. Incorporating locally native plantings or dual use farming techniques help to increase pollinator populations and would help to reduce project impacts to a less than significant level.

3-9

Recommendation or Recommended Mitigation Measure: CDFW recommends the Project be planted with deep-rooted native flowers and grasses that capture and filter storm water, build topsoil, and provide abundant and healthy food for bees and other insects that provide critical services to our food and agricultural systems as described

on the Fresh Energy website at https://fresh-energy.org/beeslovesolar/. 3-9 Cont'd

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special-status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). The CNNDB field survey form can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Submitting-Data. The completed form can be submitted online or mailed electronically to CNDDB at the following email address: CNDDB@wildlife.ca.gov. 3-10

FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.) 3-11

CONCLUSION

Pursuant to Public Resources Code § 21092 and § 21092.2, CDFW requests written notification of proposed actions and pending decisions regarding the proposed project. Written notifications shall be directed to: California Department of Fish and Wildlife North Central Region, 1701 Nimbus Road, Rancho Cordova, CA 95670 or emailed to R2CEQA@wildlife.ca.gov.

CDFW appreciates the opportunity to comment on the MND for the Kiefer Landfill Gas Utilization Project to assist Sacramento County in identifying and mitigating Project impacts on biological resources. CDFW personnel are available for consultation regarding biological resources and strategies to minimize and/or mitigate impacts. Questions regarding this letter or further coordination should be directed to Michael Shun, Senior Environmental Scientist (Specialist) at (916) 767-8444 or michael.shun@wildlife.ca.gov. 3-12

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3-13 Cont'd

Thank you,

Michael Shun
Senior Environmental Scientist (Specialist)
California Department of Fish and Wildlife
Cell: (916) 767-8444

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[1] CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

LETTER NO. 3: CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE

RESPONSE 3-1

The comment includes introductory remarks and describes the California Department of Fish and Wildlife's (CDFW's) role as a Trustee Agency under CEQA. This comment also states that CDFW may act as a Responsible Agency under CEQA if it is determined that the agency needs to exercise its regulatory authority provided by the Fish and Game Code. No further response to this comment is required.

RESPONSE 3-2

The commenter summarizes the project description and location. The commenter also states that the project description should include the whole action, including temporary impacted areas such as equipment staging areas, spoils areas, adjacent infrastructure development, and access and haul routes if applicable. The project description in the IS/MND encompasses the whole of the action proposed, including all offsite areas needed to support the project and/or project construction. The commenter is referred to Plate IS-3 Proposed RNG Plant Site Plan, on page IS-15 of the IS/MND which includes staging areas for the project.

RESPONSE 3-3

The commenter states that after preliminary review, an MND is appropriate for the project. The commenter states that CDFW is concerned with project impacts to stream systems, Crotch's bumble bee, burrowing owl, nesting birds, Western Spadefoot, and restoring temporarily disturbed areas with pollinator friendly plants. The commenter is referred to Response to Comment Nos. 3-4 through 3-9, below.

RESPONSE 3-4

The commenter states that the Draft IS/MND should identify all perennial, intermittent, and ephemeral water features, hydrologically connected aquatic resources, and associated habitats within the project footprint. The commenter recommends analyzing cumulative impacts to these resources, including those from horizontal directional drilling, riparian vegetation removal, and temporary water diversions during construction. If significant impacts are identified, the commenter recommends implementing appropriate measures and notifying CDFW to determine whether a Streambed Alteration Agreement under Fish and Game Code Section 1602 is required. The commenter notes that if project activities may affect fish or wildlife resources, CDFW would issue a Lake or Streambed Alteration (LSA) Agreement with measures to avoid or minimize impacts. The commenter also recommends early consultation with CDFW to identify opportunities to avoid or reduce impacts to fish and wildlife resources. The commenter is referred to *Errata to the Draft IS/MND*, which modifies the "Other Public Agencies Whose Approval is Required" section, to include the Section 1602 Lake and Streambed Alteration Permit from CDFW. Additionally, the commenter is referred to Section V Biological Resources, on page IS-58 of the IS/MND which states the project would comply with the LSA Agreement.

RESPONSE 3-5

The commenter states that Crotch's bumble bee (CBB), a candidate species protected under the California Endangered Species Act (CESA), may be impacted by construction, operation, and maintenance activities. The commenter recommends reviews to Mitigation Measure BIO-3, which was included in the Draft IS/MND to address potential impacts to CBB. The commenter is referred to *Errata to the Draft IS/MND*, which includes the modifications to this mitigation measure.

RESPONSE 3-6

The commenter states that burrowing owl (BUOW), a candidate species protected under CESA, may be impacted by construction, operation, and maintenance activities. The commenter recommends revisions to Mitigation Measure BIO-5, which was included in the Draft IS/MND to address potential impacts to BUOW. The commenter is referred to *Errata to the Draft IS/MND*, which includes the modifications to this mitigation measure.

RESPONSE 3-7

The commenter states that nesting birds may be impacted by the project due to the large size of the project footprint. The commenter recommends modifications to MM BIO-6, which was included in the IS/MND to address potential impacts to nesting birds. The commenter is referred to *Errata to the Draft IS/MND*, which includes the modifications to this mitigation measure.

RESPONSE 3-8

The commenter states that the Western Spadefoot (WES) has been found to occur within one mile of the project site. The commenter recommends that the Draft IS/MND includes a WES measure prior to initiation of construction activities. The commenter is referred to *Errata to the Draft IS/MND*, which includes the addition of Mitigation Measure BIO-8.

RESPONSE 3-9

The commenter recommends including measures to enhance pollinator habitat, such as native plantings and deep-rooted native flowers. Since there are no significant impacts related to pollinator habitat, the recommended mitigation measure is not included.

RESPONSE 3-10

The commenter states that, under California Public Resources Code Section 21003(e), CEQA requires that information developed in environmental documents be incorporated into a database which may be used to make supplemental environmental determinations and, as such, requests that the County ensure that any data for special-status species detected during project surveys be properly submitted. The NOI and the Draft IS/MND are available on the State Clearinghouse CEQAnet database at: https://ceqanet.lci.ca.gov/2026060539. As such, the information developed in the IS/MND has been incorporated into a database and made publicly available so that they may be used to make subsequent or supplemental environmental determinations, as appropriate. Therefore, the IS/MND is compliant with Section 21003(e) of the California Public Resources Code.

RESPONSE 3-11

The commenter states that payment of CDFW environmental document filing fees will be required. As the CEQA Lead Agency, Sacramento County would pay all applicable fees at the time of filing the Notice of Determination.

RESPONSE 3-12

This comment includes closing remarks. No further response to this comment is required.

RESPONSE 3-13

The commenter lists references for their comments. No further response to this comment is required.

COMMENT LETTER NO. 4 – SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

SACRAMENTO METROPOLITAN
AIR QUALITY
MANAGEMENT DISTRICT

July 13, 2026

Sacramento County Planning and Environmental Review
Attn: Julie Newton
827 7th street
Sacramento, CA 95814
Email: newtonj@saccounty.gov

RE: Comments on Mitigated Negative Declaration for Kiefer Landfill Gas Utilization Project

Dear Julie,

Thank you for allowing the Sac Metro Air District (District) the opportunity to review the Kiefer Landfill Gas Utilization Project Mitigated Negative Declaration (MND) released on June 12, 2026 for public comment. Kiefer Landfill is proposing to construct a renewable natural gas (RNG) plant at Kiefer Landfill and a pipeline connecting the plant to an existing PG&E natural gas pipelines in Sacramento County. Two route options are under consideration: Option 1 would consist of a 12-inch diameter pipeline, approximately an 2.2 miles in length which would exit the landfill and run northwest along Kiefer Boulevard, connecting to existing PG&E distribution pipeline near the intersection of Kiefer Boulevard and Rancho Cordova Parkway; and Option 2 would consist of a 6-inch pipeline, approximately 5.5 to 6.6 miles in length that would exit the landfill, run northwest along Kiefer Boulevard, then run north at Sunrise Boulevard, connecting to the existing PG&E transmission pipeline along Douglas Road. The RNG plant would process landfill gas to meet air quality standards and produce pipeline-quality natural gas. 4-1

Sac Metro Air District previously submitted comments on May 22, 2026 on Kiefer Landfill Gas Utilization Project Initial Study and the Air Quality Greenhouse Gas Technical Studies, Data, and Modeling Outputs (Appendix A).These comments were made by the CEQA and Land Use Team and Engineering and Compliance Division and reflected project site improvements and other considerations to benefit air quality and public health.

The MND was reviewed to determine whether comments made in the May 22 letter had been adequately addressed. Please see below for our original comments, along with a determination highlighted in yellow, after each comment that specifies whether the comment was addressed in the MND.

CEQA and Land Use Comments

Mitigation Measure (MM) (AQ-1) (Page IS 16 and 17)
MM AQ-1 states that the list of required measures was informed by SMAQMD's basic and enhanced construction emission control practices, although the list of required measures appear to be just from the Basic Emissions Control Practices (MM AQ-1). 4-2

777 12th Street, Ste. 300 • Sacramento, CA 95814
Tel: 279-207-1122 • Toll Free: 800-880-9025
AirQuality.org

Recommendation: Please clearly state that MM AQ-1 will implement the Basic Emission Control Practices. A separate Mitigation Measure should be added (AQ-2) to reflect implementation of the Enhance Exhaust control practices. This mitigation measure can be found here and is recommended for on-site emissions from construction equipment over 50 horsepower.

4-2 Cont'd

DETERMINATION: This comment was not addressed.

Table IS-2 (Maximum Daily Construction Emissions)
It is not clear how the emissions in the Overlapping Scenarios were calculated. Please clarify how the Maximum Emissions (RNG Plan Option 1) and Maximum Emissions (RNG Plan Option 2) were calculated. The reference states that the information can be found in Appendix A but it is not clear what section in Appendix A and it cannot be verified if this information is consistent with Appendix A.

Recommendation: Please clarify how the emissions in the Overlapping Scenarios was calculated and make sure that information in the Initial Study is consistent with Appendix A and reference the page number of where information cited in the Initial Study can be found in Appendix A.

4-3

DETERMINATION: This comment was not addressed. It is not clear not clarify how overlapping scenarios were calculated. Although calculations are included at the end of Appendix A, it is not clear on if they address the overlapping scenario methodology.

Footnote 4 states that emissions conservatively assume the compressor station would be built under both the Distribution Connection Route (Option 1) and the Transmission Connection Route (Option 2) scenarios

Recommendation: Please clarify how the emissions from construction of the compressor were included in Table IS-2.

DETERMINATION: This comment was not addressed. No information on compressor station emissions was added.

Operation Emission Calculations (pages IS-14 and IS-15)
Table IS-3 in the Initial Study does not describe how the emissions were calculated for the "Existing Conditions." The reference (footnote 4) refers to Emissions based on Scenario 2 within RNG Plant Emissions Study but there was no reference to how the emissions were calculated. This is critical since the emissions assumed for existing conditions form the basis for the negative operational emissions assumed for the project.

4-4

Recommendation: Please clarify how the Existing Conditions emissions reductions used in Table IS-3 were calculated.

Also, because you are calculating Net Total Emissions, please discuss the potential regional ghg impacts from generating less electricity (i.e. will there be other NOx generated in the basin to offset that electricity for production). Please also consider in that discussion, if SMUD needs to produce more electricity how that will be impacted if they use solar and have a low carbon intensity factor.

DETERMINATION: This comment was not addressed. The MND does not clarify how existing conditions emissions reductions were calculated or discuss the regional greenhouse gas impacts from generating less electricity. 4-4 Cont'd

Mitigation Measure AQ-1 (page IS-16)
Recommendation: Please add Mitigation Measure AQ-2 – see above discussion. 4-5

DETERMINATION: This comment was not addressed.

Table IS-5 (Operational Greenhouse Gas Emissions)
Consistent with the comment made on Table IS-3, it is not clear how Operational GHG emissions were calculated.
Recommendation: Please clarify how the Existing Conditions emissions reductions used in Table IS-5 were calculated. 4-6

DETERMINATION: This comment was not addressed. The MND does not clarify how existing conditions were calculated.

Electricity Generation

Appendix A (Air Quality and Greenhouse Gas Study)
Please make sure there is consistency between Appendix A (CalEE Mod Runs and AQ and GHG Report) and the Initial Study (IS) for both the quantitative and qualitative evaluation. 4-7

DETERMINATION: This comment was not addressed.

Section 2.2 Regulatory Setting (pg. 4 , pdf pg 86 of 229)
Emissions estimates in Table IS-2 include Architectural Coatings but there is no reference to the District's Architectural Coating Rule.

Recommendation: Please add Rule 442 to list of Rules - Architectural Coating: Establishes VOC limits for architectural coatings (e.g., paints, stains, preservatives). 4-8

DETERMINATION: This comment was addressed.

Engineering and Compliance Division Comments

General Comment
The Initial Study describes substantial changes to landfill gas utilization and handling infrastructure, including RNG processing, modified flare use, thermal oxidizers, off-specification gas handling, and new compressor/M&R facilities. However, the document appears to provide limited discussion of existing landfill gas collection system conditions and operational challenges relevant to the environmental baseline, including landfill gas collection performance, flare performance, elevated wellhead temperatures, upset conditions, and overall GCCS operational status.

Recommendation: Consider adding discussion regarding existing landfill gas collection and control system (GCCS) operational conditions and how the proposed RNG system would interact with ongoing landfill gas management activities, including existing elevated landfill surface temperature conditions, 4-9

GCCS balancing, temperature management, and continued landfill gas control during routine and non-routine operations. The analysis should summarize existing GCCS operational conditions relevant to project operation, discuss current gas balancing, temperature management, and landfill gas control measures.

Additionally, there should be discussion on how the RNG system will interact with existing landfill gas management conditions and clarify how the project would maintain landfill gas control effectiveness during normal operations, outages, maintenance activities, commissioning, and upset conditions.

4-9 Cont'd

DETERMINATION: This comment was not addressed. The MND still provides limited discussion of the existing landfill gas collection and control system (GCCS) and how the proposed RNG system will interact with ongoing landfill gas management. Additional discussion of the existing operational conditions and how landfill gas control will be maintained during routine and non-routine operations would strengthen the environmental analysis.

GCCS Infrastructure and Monitoring Upgrades
The Initial Study describes extensive RNG processing and interconnection infrastructure but appears to provide limited discussion regarding whether modifications or upgrades to the landfill gas collection and control system (GCCS) itself may be necessary to support long-term RNG operations and evolving landfill methane regulatory requirements.

Recommendation: Consider adding discussion regarding whether upgrades to extraction wells, header piping, condensate systems, balancing controls, or other GCCS infrastructure are anticipated and whether the existing GCCS infrastructure is sufficient to support the proposed RNG operations. The analysis should also address whether enhanced methane leak detection, temperature, oxygen, pressure, or automated monitoring systems would be incorporated, and explain how the project would align with the CARB Landfill Methane Regulation monitoring and operational expectations.

4-10

DETERMINATION: This comment was not addressed. The document still provides limited discussion of the existing landfill gas collection and control system (GCCS) and how the proposed RNG system will interact with ongoing landfill gas management. Additional discussion of the existing operational conditions and how landfill gas control will be maintained during routine and non-routine operations would strengthen the environmental analysis.

Startup, Commissioning, and Non-Routine Operations
The Initial Study acknowledges that startup, commissioning, off-specification gas handling, flare use, thermal oxidizer operation, maintenance, and contingency operations may occur during project implementation. However, the document appears to provide limited discussion regarding emissions, venting, fugitive methane releases, and landfill gas management during non-routine operating conditions.

Recommendation: Consider adding discussion regarding anticipated operating conditions during startup, shutdown, commissioning, maintenance, and upset events, including expected flare usage and off-specification gas management during transition periods. The analysis should also address monitoring and operational controls during non-routine operations and explain how compliance with landfill gas control and air quality requirements would be maintained during temporary operational disruptions.

4-11

DETERMINATION: This comment was not addressed. The revised documents still provide limited discussion of startup, commissioning, maintenance, outage, and transition scenarios, including how landfill gas will be managed and controlled during these periods. 4-11 Cont'd

Community Odor and Fugitive Release Potential Near Compressor/M&R Facilities
Under Option 1, the project proposes a new compressor station near Douglas Road and Sunrise Boulevard, and under Option 2, an M&R station near the PG&E interconnect. While the Initial Study addresses operational emissions generally, it appears to provide limited discussion regarding potential venting, blowdowns, fugitive gas releases, emergency depressurization events, or nuisance odor impacts associated with compressor or M&R infrastructure to nearby residential and commercial receptors.

Recommendation: Consider adding discussion regarding whether routine or emergency venting or blowdown activities may occur, as well as potential fugitive gas release mechanisms associated with compressor and regulating equipment. The analysis should also address proposed leak detection, monitoring, and shutdown systems, and evaluate whether intermittent operational releases could contribute to existing community odor conditions in the surrounding area. 4-12

Reference correction
Recommendation: On page IS-2, the wrong subpart is referenced under Particulate Control and the associated footnote. The reference should be 40 CFR Part 62 Subpart OOO (Federal Plan Requirements for Municipal Solid Waste Landfills that commenced construction on or before July 17, 2014 and have not been modified or reconstructed since July 17, 2014).

DETERMINATION: This comment was addressed.

Operation of new LFG System
On page IS-5, it states that two of the existing LFG engines would be converted to natural gas. However, it does not state what the produced power will be used for.

Recommendation: Consider adding discussion that covers the use of the converted engines, and clarify what is considered "critical infrastructure." 4-13

DETERMINATION: This comment was not addressed. The MND should clarify their intended use, what is meant by "critical infrastructure," and whether emissions from those engines are included in the operational emissions analysis.

Maximum Daily Operational Emissions
Table IS-3 demonstrates a reduction of criteria pollutants when compared to existing landfill condition for Options 1 and 2. Confirm potential emissions for the RNG plant include the emissions for existing flares (Flare No. 1 and Flare No. 2 operating 20% of year- NextEra Memo dated 1/22/26), two converted natural gas engines, one ICE, and two street sweepers since those will remain onsite and operational (as needed). 4-14

Recommendation: Consider adding discussion regarding whether Flare No. 1 and Flare No. 2 operational limits are intended to accommodate only planned or unplanned short-term outages rather than continuous operation and clarify the meaning of "infrequently" referenced in IS-5, including any applicable operational thresholds or percentages.

The analysis should also address whether Flare No. 1 and Flare No. 2 can adequately maintain required landfill operating conditions, including sufficient vacuum and negative pressure, during an RNG plant outage, and specify how long the flares could operate while maintaining compliance with landfill operating conditions. In addition, the discussion should explain whether an unplanned power outage affecting the RNG plant would also impact Flare No. 1 and Flare No. 2, and if so, describe the measures landfill operators would implement to maintain gas control during such events.

4-14 Cont'd

The analysis should further describe the anticipated timeline for startup of the existing flares when the RNG plant is offline, identify potential impacts on the gas collection system during transition periods, and explain staff roles, responsibilities, and monitoring procedures during RNG plant outages and activation of the existing flares.

DETERMINATION: This comment was not addressed. It would also be helpful to clarify that the operational emissions inventory includes all remaining operational sources (including the converted engines, flares, and other applicable equipment) and to better explain the assumptions regarding flare operation during RNG plant outages.

Please contact me at rmuzzy@airquality.org if you have any questions regarding these comments.

Sincerely,

Rich Muzzy

Richard Muzzy
Supervisor, CEQA and Land Use

cc: Paul Philley, Sac Metro Air District Transportation, Program Manager
Angela Thompson, Sac Metro Engineering and Compliance Division, Program Manager
Steve Mosunic, Sac Metro Engineering and Compliance Division, Program Manager

LETTER NO. 4: SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

RESPONSE 4-1

The commenter provides introductory remarks, summarizes the project description and SMAQMD's previous comments on the Initial Study and Appendix A, and states that the review was conducted to determine whether those comments had been adequately addressed. No further response to this comment is required.

RESPONSE 4-2

The commenter states that MM AQ-1 lists SMAQMD's Basic Emission Control Practices rather than the additional Enhanced Construction Emission Control Practices. The commenter recommends revising MM AQ-1 to apply only to the Basic Emission Control Practices and adding a separate mitigation measure for the Enhanced Exhaust Control Practices. As shown in Table IS-2, construction emissions would not exceed SMAQMD's Significant Thresholds with implementation of MM AQ-1. The commenter is referred to *Errata to the Draft IS/MND*, which includes the modifications to this mitigation measure to clearly state Basic Emission Control Practices.

Regarding SMAQMD's suggested mitigation (MM AQ-2) for Enhanced Exhaust control practices, the SMAQMD *Guide to Air Quality Assessment in Sacramento County* states that Enhanced Construction Emission control practices, which includes Enhanced Exhaust control practices, are for "...projects that will generate maximum daily NOx emissions that exceed the Sac Metro Air District's threshold of significance." The commenter is referred to *Errata to the Draft IS/MND*, which includes the addition of this mitigation measure to reduce off-road equipment exhaust-related emissions during construction.

RESPONSE 4-3

The commenter requests clarification on how emissions were calculated for the Overlapping Scenarios and how emissions associated with compressor construction were incorporated into Table IS-2. The commenter is referred to Table Note 5 in Section IV, Air Quality, on page IS-33 of the IS/MND which includes clarification of the Overlapping Scenario calculations. Table Note 5 states that "The complete emissions table with overlapping scenarios is provided in Appendix A. CalEEMod Section 3, Construction Emissions Details, was used to show the maximum pounds per day per construction phase for each project component (i.e., RNG Plant, Option 1, and Option 2). The Construction Emissions – Overlapping Scenarios table depicts each project component, as well as the construction phase and start/end dates; refer to Appendix A. The table shows 16 overlapping scenarios and the associated maximum overlapping emissions." As noted, overlapping scenarios were developed using the construction phasing and start and end dates provided for each project component. The analysis evaluated 16 overlapping scenarios and identified the maximum associated emissions. Compressor construction was evaluated using the maximum emissions scenario and included under Option 2.

RESPONSE 4-4

The commenter states that Table IS-3 of the Initial Study does not describe how emissions were calculated for "Existing Conditions" and recommends clarification and the discussion of potential regional GHG impacts. The Existing Conditions emissions presented in Table IS-3 were developed using Historical Actual Emissions (HAE) consistent with SMAQMD guidance. HAE

was determined using the two-year period immediately preceding submission of the Authority to Construct (ATC) application, provided those years were representative of normal facility operations. Where necessary, operational data from two consecutive years within the previous five-year period that were representative of normal operations were evaluated and compared with annual emissions reported to SMAQMD through the Kiefer Landfill's required annual emissions inventory reports.

The existing conditions analysis focused on the landfill gas (LFG) engines because these are the primary emission sources that would be removed or modified as part of the proposed RNG project. Existing landfill flares are not being modified and would remain available for landfill gas control under the proposed project.

The current SMAQMD permit establishes combined annual emission limits for the landfill gas engines and flares rather than separate annual limits for each individual source. To estimate source-specific emissions, the combined permitted annual emissions were allocated among the engines and flares based on the ratio of each source's permitted daily emission limits. This allocation methodology was used to estimate individual source contributions and develop a representative existing conditions emissions inventory.

For most pollutants, HAE were applied to the landfill gas engines, while permitted emissions were retained for the flares because the flares would remain in service and are not being modified by the project. However, for nitrogen oxides (NOx) and carbon monoxide (CO), applying historical actual engine emissions together with apportioned flare emissions resulted in a combined total that exceeded the currently permitted facility-wide annual emission limits. To avoid overstating existing conditions emissions, the HAE for the engines were retained, and the remaining allowable emissions up to the facility-wide permitted limit were allocated to the flares.

The resulting existing conditions emissions inventory was then used as the baseline for comparison with the proposed project operating scenarios presented in Table IS-3. The operating conditions result in a net reduction of criteria pollutant emissions relative to existing conditions. The commenter is referred to the *Errata to the Draft IS/MND* where the tables for the Summary of 2021-2025 HAE and the HAE and Proposed Potential to Emit Summary for Scenarios 2 and 3 have been added to Appendix A to clarify how the project’s air quality emissions were calculated.

In regard to regional GHG impacts, it is not known how Sacramento Municipal Utility District (SMUD) would generate additional electricity at this time and future electricity would be required to comply with the renewable portfolio standard. However, SMUD’s current portfolio of energy sources includes hydropower, natural gas generators, renewable energy sources (e.g., wind, solar, and geothermal), biomass, and wholesale purchases. The project is intended to take up to 15 MW of landfill gas engine power generation offline. Without this source of power generation, there could be a need for additional power generation by SMUD through their other sources. Since the GHG emissions from landfill gas engine power generation is equal to or greater than essentially all of SMUD’s other sources on a per MW basis, any increase in electricity production to offset the reduced use of the landfill gas engines would result in a net reduction of GHG emissions.

RESPONSE 4-5

The commenter recommends that MM AQ-2 is included. The commenter is referred to Response to Comment No. 4-2 above and to the *Errata to the Draft IS/MND*, which includes the

addition of this mitigation measure to reduce off-road equipment exhaust-related emissions during construction.

RESPONSE 4-6

The commenter requests clarity on how the existing conditions emissions reductions used in IS-5 were calculated. The commenter is referred to Response to Comment No. 4-4 above.

RESPONSE 4-7

The commenter states that consistency should be ensured between Appendix A and the Initial Study for the quantitative and qualitative evaluation regarding electricity generation. The commenter is referred to Section VII, Energy, of the IS/MND and Section IX, Greenhouse Gas Emissions, of the IS/MND which addresses electricity generation of the proposed project. Specifically, as shown in Table IS-7 (page IS-77) and Appendix A (Operational Electricity and Natural Gas Calculation Sheet), the RNG plant would generate 37,431 MWh of electricity. The RNG plant's electricity generation has been accounted for in the greenhouse gas emissions shown in Table IS-9 (page IS-93). The Energy Conversion to Greenhouse Gas Emissions Calculation Sheet has been added to Appendix A to clarify how the project's energy greenhouse gas emissions were calculated.

RESPONSE 4-8

The commenter states that comments related to the District's Architectural Coating Rule were addressed. No further response to this comment is required.

RESPONSE 4-9

The commenter states that the Draft IS/MND provides limited discussion of the existing landfill gas collection and control system (GCCS) and how the proposed RNG system will interact with ongoing landfill gas management. The commenter requests additional discussion of the existing operational conditions and how control will be maintained during routine and non-routine operations. For the proposed RNG project, the landfill GCCS will continue to be maintained in a manner consistent with current operational and regulatory compliance requirements applicable to the existing landfill gas-to-energy (LFGTE) facilities. Operation of the RNG project is not anticipated to require substantive changes to GCCS operational conditions during routine operations or during planned and unplanned outages. As is typical for landfill GCCS operations, ongoing maintenance activities, repairs, balancing, and tuning will continue to be performed to ensure the GCCS remains compliant with applicable regulations and continues to produce quality landfill gas. Additionally, the commenter is referred to Operation, on page IS-8 through IS-10 of the IS/MND, which addresses how landfill gas control will be maintained during routine and non-routine operations.

RESPONSE 4-10

The commenter states that discussion should be considered on whether upgrades to GCCS infrastructure are anticipated to support the proposed RNG operations. The comment states that the analysis should address whether enhanced methane leak detection, temperature, oxygen, pressure, or automated monitoring systems would be incorporated and how the project would align with the CARB Landfill Methane Regulation monitoring and operational expectations. Existing extraction wells, header piping, condensate systems, balancing controls, and related GCCS infrastructure for the RNG plant will continue to be maintained consistent with current operational and regulatory compliance practices associated with existing LFGTE facilities. No

enhancements to the GCCS infrastructure are anticipated beyond those that already regularly/periodically occur in the course of routine maintenance, balancing, tuning, and enhancing of existing infrastructure undertaken to optimize system performance and maintain regulatory compliance.

RESPONSE 4-11

The commenter recommends discussing operational conditions during startup, shutdown, commissioning, maintenance, and upset events. The commenter also requests analysis of controls during non-routine operations and how compliance with landfill gas control and air quality requirements would be maintained during temporary disruptions. The commenter is referred to Operation, on page IS-8 through IS-10 of the IS/MND, which describes the project's proposed commissioning, operations, and maintenance processes.

RESPONSE 4-12

The commenter states that discussion regarding routine or emergency venting or blowdown activities and the reference on page IS-2 that was incorrect were addressed in the Draft IS/MND. No further response to this comment is required.

RESPONSE 4-13

The commenter states that discussion should be added that covers the use of the converted engines and clarifies what is considered "critical infrastructure." The existing engine(s) would be converted to run on natural gas and would be used to self-power the RNG facility. The commenter is referred to the *Errata to the Draft IS/MND*, which includes modifications to Operation, on pages IS-8 through IS-10 of the IS/MND, to further clarify critical infrastructure and the use of converted engines.

RESPONSE 4-14

The commenter states that discussion should be added regarding Flare No.1 and Flare No, 2 operational limits and whether they can adequately maintain required landfill operating conditions. The commenter also states that the analysis should describe the anticipated timeline for startup of the existing flares when the RNG plant is offline. The commenter is referred to the *Errata to the Draft IS/MND*, which includes the modifications to Operation, on pages IS-8 through IS-10 of the IS/MND, to further clarify operation of the landfill gas management system. In response to the commenter's request to clarify that the operational emissions inventory includes all remaining operational sources, the following sentence has been added to the Operation discussion on page IS-10 of the IS/MND: "The operational emissions analysis presented in this MND includes emissions from applicable operational sources that would remain onsite following project implementation, including the converted engines, internal combustion engine, existing flares (operated under the conservative 20-percent annual assumption), street sweepers, and other applicable operational equipment associated with the landfill."

COMMENT LETTER NO. 5 – SACRAMENTO MUNICIPAL UTILITY DISTRICT

Powering forward. Together.

SMUD

Sent Via E-Mail

July 15, 2026

Environmental Coordinator
Sacramento County
Planning and Environmental Review
827 7th Street, Room 225
Sacramento, CA 95814
ceqa@saccounty.net

Subject: **Kiefer Landfill Gas Utilization Project / MND / 2026060539**

Dear Ms. Newton:

The Sacramento Municipal Utility District (SMUD) appreciates the opportunity to provide comments on the Mitigated Negative Declaration (MND) for the Kiefer Landfill Gas Utilization Project (Project, SCH 2026060539).

As a Responsible Agency, SMUD's review of projects include supporting the goals of our 2030 Zero Carbon Plan. This plan is a flexible road map to eliminate greenhouse gas emissions from our electricity production by 2030, which is the most ambitious goal of any large utility in the United States, while maintaining reliable and affordable service. This ambitious goal puts the Sacramento region on the map as an example to follow and a region where innovative, climate-friendly businesses want to be. As a community-owned, not-for-profit utility, our customers and community are at the heart of all we do. By pursuing zero carbon, we're helping create a cleaner and healthier region for all. 5-1

It is our desire that the Project will acknowledge any impacts related to the following:

- Overhead and/or underground transmission and distribution line easements. Please view the following links on smud.org for more information regarding transmission encroachment:
  - https://www.smud.org/en/Business-Solutions-and-Rebates/Design-and-Construction-Services
  - https://www.smud.org/en/Corporate/Do-Business-with-SMUD/Land-Use/Transmission-Right-of-Way
- Utility line routing
- Electrical load needs/requirements
- Energy Efficiency
- Climate Change
- Cumulative impacts related to the need for increased electrical delivery
- The potential need to relocate and or remove any SMUD infrastructure that may be affected in or around the project area

5-2

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More specifically, SMUD would like to have the following details related to the electrical infrastructure incorporated into the project description:

- SMUD has existing underground facilities at the following locations:
  - On parcels 126-0090-020-0000 and 126-0090-021-0000
  - Along Kiefer Blvd. from the intersection of Rancho Cordova Pkwy to the intersection of Sunrise Blvd
  - Along Sunrise Blvd from the intersection of Kiefer Blvd to Douglas Rd
  - Across Sunrise Blvd at the intersection of Herodian Dr
  - On parcel 067-0030-079-0000
  - On the parcels surrounding the proposed "Alternate Compressor" location (on parcels 067-2370-001-0000, 067-2370-002-0000, 067-2370-022-0000, 067-2370-023-0000, 067-2370-020-0000, 067-2370-021-0000, and 067-2370-005-0000)
  - Along Douglas Rd, west of the Folsom South Canal to approximately 400 feet East of the intersection of Eagles Nest Rd
  - Along Douglas Rd, east of the intersection of Sunrise Blvd to the intersection of Rancho Cordova Pkwy

- SMUD has existing overhead facilities at the following locations:
  - On parcels 126-0090-020-0000 and 126-0090-021-0000
  - Bordering parcels 126-0090-020-0000 and 126-0090-021-0000 along Kiefer Blvd and Grant Line Rd
  - Along Kiefer Blvd from the point where it meets parcel 067-0100-015-0000 to the intersection of Rancho Cordova Pkwy
  - Across Kiefer Blvd approximately 900 feet East of the intersection of Sunrise Blvd
  - At the intersection of Kiefer Blvd and Sunrise Blvd
  - Along Sunrise Blvd from the intersection of Kiefer Blvd to Douglas Rd
  - On parcel 067-0030-079-0000 and bordering the parcel along Douglas Rd
  - On parcel 067-0030-078-0000 and bordering the parcel along Douglas Rd
  - Along Douglas Rd, west of the intersection of Sunrise Blvd to the Folsom South Canal
  - Across Douglas Rd approximately 400 feet East of the intersection of Eagles Nest Rd
  - Along Douglas Rd, east of the intersection of Sunrise Blvd to the intersection of Rancho Cordova Pkwy

- SMUD owns and operates two (2) existing 230 kilovolt (kV) electric transmission supply lines and fiber optic communication circuits along the new pipeline route. A pipeline crossing of the transmission lines is expected on Kiefer Blvd about 800 feet east of the Sunrise Blvd intersection. The following conditions apply to this transmission line crossing.
  - The Applicant shall identify SMUD's transmission line easement as a "Restricted Building and Use Area" on the subject map. The transmission line easement area shall be subject to SMUD's direction on suitable landscaping and tree placement within the easement area and such landscaping shall be subject to SMUD's vegetation management practices including but not limited to tree pruning, removal, a height restriction of fifteen feet tall at full maturity, and weed abatement.

5-2 Cont'd

- SMUD occupies a transmission line easement within the boundaries of the subject map and certain uses are not permitted or compatible with the safety, operation, or maintenance and construction of our transmission line facilities. If the Applicant proposes any use within the transmission line easement, the Applicant shall route its plans to SMUD for review. Additionally, the transmission line easement area shall be subject to SMUD's landscaping and tree placement guidelines within the easement area, including but not limited to species type and height restriction of fifteen feet tall at full maturity, and such landscaping shall be subject to SMUD's vegetation management practices including but not limited to tree pruning, removal, and weed abatement. For more information regarding transmission encroachment, please visit: https://www.smud.org/en/Corporate/Do-Business-with-SMUD/Land-Use/Transmission-Right-of-Way.
- Prior to the issuance of any grading or building permits, the Applicant or its designee shall obtain a joint-use agreement from SMUD consenting to proposed development within SMUD's transmission line easement. Please contact SMUD's Property Administrator for application procedures.

5-2 Cont'd

- **All existing facilities will need to remain.**
- **If any of SMUD's existing overhead and underground infrastructure needs to be relocated to accommodate the proposed project, please include in the project description and in the environmental impact analysis.**

SMUD would like to be involved with discussing the above areas of interest as well as discussing any other potential issues. We aim to be partners in the efficient and sustainable delivery of the proposed Project. Please ensure that the information included in this response is conveyed to the Project planners and the appropriate Project proponents.

Environmental leadership is a core value of SMUD, and we look forward to collaborating with you on this Project. Again, we appreciate the opportunity to provide input on this Project. If you have any questions regarding this letter, please do not hesitate to contact me at 916.732.5063, or by email at Kim.Crawford@smud.org.

5-3

Sincerely,

K. Crawford

Kim Crawford
Environmental Services Specialist
Sacramento Municipal Utility District
6201 S Street
Sacramento, CA 95817

cc: Entitlements

LETTER NO. 5: SACRAMENTO MUNICIPAL UTILITY DISTRICT

RESPONSE 5-1

The commenter includes introductory remarks regarding SMUD's role as a Responsible Agency. No response to this comment is required.

RESPONSE 5-2

The commenter requests that the project acknowledges impacts to overhead and/or underground transmission and distribution line easements, utility line routing, electrical load needs, energy efficiency, climate change, cumulative impacts. The commenter notes the potential need to relocate and/or remove SMUD infrastructure and requests details be incorporated into the project description regarding electrical infrastructure. The commenter is referred to *Errata to the Draft IS/MND*, which provides additional detail that infrastructure relocation coordination with appropriate service providers will be an on-going effort as the project progresses.

RESPONSE 5-3

The commenter includes closing remarks. No response to this comment is required.

COMMENT LETTER NO. 6 – AVDIS & CUCCHI, LLP ON BEHALF OF ANATOLIA MARKETPLACE, LLC

AVDIS & CUCCHI, LLP

July 13, 2026

Via Email: CEQA@saccounty.gov

Sacramento County Planning and Environmental Review Division
Attn: Julie Newton, Environmental Coordinator
827 7th Street, Room 225
Sacramento, CA 95814

Re: Comments on Mitigated Negative Declaration for Kiefer Landfill Gas Utilization Project
Control No. PLER2024-00137

Dear Ms. Newton:

This office submits these comments on behalf of Anatolia Marketplace LLC, the owner and developer of property located east of Sunrise Boulevard, between Herodian Drive and Douglas Road, within the Anatolia Marketplace commercial center in the City of Rancho Cordova. 6-1

Based on the project description in the Mitigated Negative Declaration ("MND") prepared for the Kiefer Landfill Gas Utilization Project, Anatolia Marketplace understands that its property is one of the two potential locations under consideration for the proposed compressor station and related pipeline infrastructure associated with the project. Specifically, the MND identifies Anatolia Marketplace as an "undeveloped General Commercial zoned parcel east of Sunrise Boulevard between Herodian Drive and Douglas Road, directly south of a Chevron Extra Mile gas station."

Anatolia Marketplace does not oppose renewable natural gas infrastructure generally. However, the MND's description and analysis of the eastern compressor/M&R station site are materially incomplete. The MND partially describes surrounding commercial and residential uses, but it does not disclose the eastern site's integration into Anatolia Marketplace as an approved and partially developed retail shopping center governed by an approved commercial site plan, internal circulation, reciprocal easements, CC&Rs, common-area arrangements, and planned future retail development.

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info@avdiscucchi.com | www.avdiscucchi.com

Anatolia Marketplace has previously been in direct communications with the applicant and/or project representatives regarding the potential use of the eastern site for the proposed compressor/M&R station and related pipeline infrastructure. Anatolia Marketplace is submitting excerpts of those communications with these comments. Those excerpts provide additional project-specific context regarding the site, facility design, operational venting, maintenance activities, easements, CC&R issues, temporary construction needs, and private approval requirements that is not adequately reflected in the MND.

Before adopting the MND, the County should revise the environmental document to provide an accurate project description, disclose the full environmental setting, identify all required approvals and real property interests, and analyze the project's potential land use, odor, hazards, air quality, noise, circulation, construction, sensitive receptor, and compatibility impacts.

I. The MND's Description of the Eastern Compressor/M&R Station Site Is Materially Incomplete.

6-1
Cont'd

The MND describes the eastern site as an undeveloped General Commercial parcel east of Sunrise Boulevard, between Herodian Drive and Douglas Road, directly south of a Chevron Extra Mile gas station. The MND further states that the alternate location is surrounded by commercial businesses with paved parking lots to the north and west, a residential community to the east, and open space or future commercial development to the south.

Anatolia Marketplace appreciates that the MND identifies some surrounding land uses. However, the description remains materially incomplete because it does not disclose that the eastern site is part of Anatolia Marketplace, an approved and partially developed retail shopping center. The approved commercial center plan is for a retail shopping center. The current CC&Rs likewise assume a full retail shopping center. In order to accommodate the proposed PG&E/NextEra facility, the approved site plan would need to be amended, and the property configuration would require at least a lot line adjustment, lot merger, or similar real property reconfiguration process.

The distinction matters. A compressor/M&R station located within an integrated retail shopping center presents materially different environmental and land use considerations than the same facility located on an isolated undeveloped commercial parcel. The MND should disclose the actual commercial center context so that decision-makers and the public can meaningfully evaluate the project's potential impacts.

CEQA requires an accurate, stable, and finite project description. (CEQA Guidelines section 15124; *County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185.) CEQA also requires the environmental document to disclose the physical environmental conditions in the vicinity of the project as they exist at the time environmental analysis begins. (CEQA Guidelines section 15125; *Save Our Peninsula Committee v. Monterey County Bd. of Supervisors* (2001) 87 Cal.App.4th 99.) The MND's limited description of the eastern site omits material information needed to understand the project's actual setting and potential environmental effects.

II. Prior Communications with the Applicant Show that the Eastern Site Would Need to Be Integrated into an Existing Retail Shopping Center Framework.

Anatolia Marketplace has been in prior communications with the applicant and/or project representatives regarding potential use of the eastern site.

Those communications provide important context that is not reflected in the MND. Among other things, the communications indicate that implementation of the eastern site would require or contemplate:

6-1 Cont'd

1. written Declarant approval;
2. Architectural Review Committee approval of compressor station plans;
3. a recorded amendment expressly permitting the renewable natural gas compressor facility;
4. estoppels from other parcel owners acknowledging the intended use;
5. pipeline easements across portions of the commercial center;
6. temporary construction rights or laydown areas; and
7. property reconfiguration to accommodate the proposed facility footprint.

Anatolia Marketplace does not contend that private CC&R issues are themselves CEQA impacts. Rather, these communications are relevant because they evidence the integrated physical and operational structure of the shopping center and the likely need for changes to site planning, access, easements, common areas, and future retail buildout. This information directly bears on the adequacy of the MND's project description, environmental setting, land use compatibility analysis, construction analysis, and transportation/circulation analysis.

The MND should be revised to disclose that the eastern site is not merely an undeveloped General Commercial parcel, but part of a larger retail shopping center subject to existing site planning, reciprocal easement, CC&Rs, common-area, and third-party approval structures.

III. The MND Should Analyze the Eastern Site as Part of an Approved Retail Shopping Center, Not Merely as a Vacant Commercial Parcel.

The approved Anatolia Marketplace plan is for a retail shopping center. Existing development west and northwest of the subject property already includes customer-serving commercial uses. The undeveloped portion of the site is intended for continued retail development. The current CC&Rs assume full retail shopping center buildout.

The MND should be revised to disclose and analyze the eastern site's actual setting, including:

1. the existing and planned retail shopping center uses within Anatolia Marketplace;
2. the Chevron Extra Mile immediately north of the potential site;
3. existing and planned drive aisles, parking areas, access routes, and internal circulation patterns;
4. existing and planned retail and restaurant pads;
5. the relationship between the compressor/M&R station site, surrounding tenants, customers, employees, vendors, pedestrians, and delivery vehicles;
6. existing CC&Rs, reciprocal easements, access rights, and development restrictions affecting the shopping center;
7. the site plan amendment necessary to accommodate the proposed PG&E/NextEra facility; and
8. the lot line adjustment, lot merger, or other property reconfiguration necessary to create or accommodate the proposed facility site.

6-1 Cont'd

Without this information, the MND does not allow meaningful evaluation of whether the proposed compressor/M&R station is compatible with the actual land use setting.

IV. The MND Does Not Adequately Analyze Operational Venting, Odor, Hazards, and Compatibility in Relation to Nearby Sensitive Receptors.

The MND identifies some residences and parks in the broader study area, including residential uses along portions of the pipeline alignment and parks within the project vicinity. Anatolia Marketplace does not contend that the MND entirely omits sensitive receptors from discussion. However, the MND does not adequately analyze the eastern station's operational venting, odor, emergency-release, and compatibility issues in relation to those receptors and the adjacent retail shopping center. An aerial image of the area shows the subject property as the undeveloped property in the middle of the Anatolia Marketplace area. To the east, southeast, and south are existing residential neighborhoods and a community park. These are relevant

receptors for purposes of evaluating noise, odor, air quality, hazards, emergency response, construction, and land use compatibility.

The MND should be revised to analyze the relationship between the eastern compressor/M&R station site and:

1. residences to the east;
2. residences to the southeast;
3. residences to the south;
4. the nearby community park;
5. existing and planned commercial uses within Anatolia Marketplace;
6. the Chevron Extra Mile; and
7. pedestrian, customer, and employee activity associated with the surrounding retail center.

This context is particularly important because the facility may involve compressors, mechanical and electrical equipment, noise enclosures, security walls or fencing, maintenance activities, odorized gas, and potential venting during maintenance or emergency conditions.

6-1 Cont'd

V. The MND Should Clarify Whether the Eastern Site Is an Existing Legal Parcel or Requires a Lot Line Adjustment, Lot Merger, or Similar Real Property Process.

The MND refers to the eastern site as a "parcel." However, based on Anatolia Marketplace's understanding of the property and its prior communications with the applicant/project representatives, the proposed compressor/M&R station location would require at least a **lot line adjustment, lot merger, or similar process** to accommodate the facility. The approved commercial center plan is for a retail shopping center, and a site plan amendment would be necessary to incorporate the PG&E/NextEra facility into that plan.

This uncertainty is significant under CEQA. The environmental document should disclose whether the compressor/M&R station would be located on:

1. an existing legal parcel;
2. a future parcel created by lot line adjustment, lot merger, parcel map, or other subdivision process;
3. a pad within the existing shopping center;
4. a fee acquisition area combined with one or more easements; or
5. some other real property configuration.

The County should not adopt the MND without identifying the actual development footprint, access routes, utility connections, easement areas, laydown areas, and real property approvals required for the eastern site. If those components remain undefined, the project description is incomplete and improperly defers analysis of potentially significant impacts.

VI. The MND Should Disclose and Analyze the Need to Amend the Approved Commercial Center Plan.

The approved commercial center plan is for a retail shopping center. The current site planning, circulation, access, parking, reciprocal rights, and CC&Rs are based on that retail shopping center concept.

Accommodating a compressor/M&R station and related PG&E/NextEra infrastructure would require amendment of the approved site plan. The MND should disclose and analyze that fact. It should not simply assume that a utility facility can be inserted into the commercial center without environmental consequences.

6-1 Cont'd

The site plan amendment may affect:

1. future retail building pads;
2. parking supply and layout;
3. drive aisles and internal circulation;
4. pedestrian routes;
5. emergency access;
6. utility corridors;
7. loading and service areas;
8. customer access and circulation;
9. relationships among parcels within the center;
10. consistency with the current CC&Rs; and
11. future buildout assumptions for Anatolia Marketplace.

These are not merely private business concerns. They are relevant to CEQA because they relate to the project's physical environmental setting, land use compatibility, transportation and circulation, hazards, noise, and construction impacts.

VII. The MND Should Disclose and Analyze the Current CC&R and Reciprocal Easement Context.

The current CC&Rs assume a full retail shopping center. Based on prior communications with the applicant/project representatives, Anatolia Marketplace understands that PG&E/NextEra

evaluated whether the CC&Rs were sufficient to allow the proposed facility and related pipeline infrastructure. The correspondence further indicate that implementation of the eastern site would require or contemplate written Declarant approval, ARC approval of the compressor station plans, a recorded amendment expressly permitting the renewable natural gas compressor facility, and estoppels from other parcel owners acknowledging the intended use.

Again, Anatolia Marketplace does not contend that private CC&Rs issues are themselves CEQA impacts. Rather, they are relevant because they show that the eastern site is part of an integrated shopping center structure and that implementing the proposed facility may require physical or operational changes to the approved site plan, access system, parking layout, utility corridors, common areas, and future retail buildout.

The MND should disclose whether implementation of the eastern compressor/M&R station site would require:

1. amendment of the CC&Rs;
2. amendment of reciprocal easement rights;
3. Declarant approval;
4. architectural review approval;
5. consent or estoppels from other owners or parcel users;
6. modification of common area rights;
7. changes to parking, access, or utility easements; or
8. other third-party approvals.

6-1
Cont'd

These issues bear on whether the project can physically and operationally be integrated into the existing commercial center and whether implementation would require secondary physical changes to the site plan, circulation system, parking fields, common areas, access rights, or future retail buildout.

VIII. The MND Should Disclose and Analyze the Full Scope of the Compressor/M&R Station and Associated Infrastructure.

The MND states that the compressor station would occupy up to approximately 25,000 square feet and include vehicle access, compressors and associated mechanical and electrical equipment, a noise-suppressing enclosure, and a block wall or fencing for noise abatement, visual screening, and security. That general description should be supplemented with site-specific information for the eastern location.

The MND should disclose and analyze the full scope of the proposed compressor/M&R station and related infrastructure at the eastern site, including:

1. the precise station footprint;
2. the height, length, location, and design of perimeter walls or fencing;
3. the location and size of all compressors, enclosures, electrical equipment, mechanical equipment, odor-control equipment, gas detection systems, and venting equipment;
4. maintenance access points and vehicle turning movements;
5. equipment replacement and emergency access requirements;
6. the location of aboveground and underground pipelines;
7. the relationship between the compressor/M&R station and existing or planned shopping center drive aisles, tenant access, parking areas, and loading areas; and
8. whether any improvements would conflict with previously approved commercial development plans.

This information is especially important because the eastern site is located within a planned retail shopping center and adjacent to existing neighborhoods and a community park.

6-1
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IX. The MND Should Analyze Potential Odor, Venting, Emergency Release, and Hazard Impacts Using the More Specific Information Provided by the Applicant/Project Representatives.

The MND does address odors, pressure relief valves, and maintenance depressurization at a general level. It states that pressure relief valves may discharge gas to a designated safe location, that periodic maintenance activities may require temporary depressurization of isolated piping segments or equipment, and that such activities are expected to occur infrequently and in accordance with PG&E procedures.

However, prior communications between Anatolia Marketplace and the applicant/project representatives include more specific information that is not adequately disclosed or analyzed in the MND. Those communications indicate that:

1. pressure relief valves may release odorized gas during emergency events;
2. routine maintenance with venting is expected to occur quarterly or bi-annually;
3. maintenance may last approximately one day;
4. gas venting may occur over approximately ten minutes;
5. filter venting may take approximately 20 to 60 seconds;
6. gas dispersion modeling had not been completed for typical maintenance venting; and

7. odor travel may depend on site-specific conditions, including wind, pressure cells, and inversion layers.

These operational characteristics are material to the CEQA analysis. The MND should disclose and analyze:

1. whether routine, periodic, intermittent, emergency, or upset-condition venting may occur;
2. the expected frequency, duration, volume, and composition of any releases;
3. whether released gas would be odorized;
4. whether odors could be perceptible to customers, employees, tenants, nearby residents, park users, or pedestrians;
5. whether gas dispersion modeling has been prepared;
6. whether site-specific wind, atmospheric, and inversion conditions have been considered;
7. whether emergency releases could occur and under what conditions;
8. whether releases could affect nearby retail, restaurant, fueling, park, or residential uses;
9. whether the facility would require emergency response protocols or special access restrictions; and
10. whether mitigation measures are required to reduce hazards, odor, air quality, or nuisance impacts to a less-than-significant level.

6-1 Cont'd

The MND's current analysis does not appear to provide sufficient detail to allow meaningful public review of these issues in the eastern site's actual retail/residential context. If substantial evidence supports a fair argument that the project may result in significant hazards, odor, air quality, or land use compatibility impacts, an EIR is required. (*See* CEQA Guidelines sections 15064 and 15070; *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68; *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296.)

X. The MND Should Analyze Land Use Compatibility with Existing and Planned Commercial Uses and Nearby Residential/Park Uses.

The MND concludes that the compressor and M&R sites would not introduce new land use incompatibilities. Anatolia Marketplace respectfully disagrees that the record currently supports that conclusion for the eastern site.

The eastern site is located within Anatolia Marketplace, a planned retail shopping center, and near existing residential neighborhoods and a community park. The MND should analyze

whether the compressor/M&R station and related infrastructure are compatible with that setting.

The MND should address, at minimum:

1. whether the facility would conflict with existing or planned retail, restaurant, service commercial, or fueling uses;
2. whether the facility would affect future retail development on the undeveloped portion of Anatolia Marketplace;
3. whether odor, noise, visual screening, security fencing, maintenance activity, or emergency protocols would affect adjacent tenants, customers, employees, vendors, park users, or residents;
4. whether the facility would affect outdoor dining, pedestrian access, customer comfort, or tenant operations;
5. whether the facility would affect the Chevron Extra Mile or associated fueling operations;
6. whether the facility would conflict with City of Rancho Cordova development standards for General Commercial uses;
7. whether the facility would affect nearby residential neighborhoods to the east, southeast, and south; and
8. whether the facility would require enforceable conditions of approval to address land use compatibility.

6-1
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The MND should not rely solely on the fact that the site is zoned General Commercial. Zoning consistency is not a substitute for CEQA analysis of environmental impacts in the actual physical setting.

XI. The MND Should Identify and Analyze Temporary Construction Laydown, Staging, Access, and Pipeline Work Affecting Anatolia Marketplace.

The MND states that a temporary construction laydown yard would be located adjacent to the compressor station site on commercial or previously disturbed land. It also states that secondary construction staging and laydown areas along the pipeline route may be needed. However, the MND does not provide sufficient detail regarding the size, duration, exact location, access route, or effect of laydown and staging on Anatolia Marketplace.

Prior communications between Anatolia Marketplace and the applicant/project representatives indicate that temporary construction space may be required in or adjacent to the shopping

center. The MND should disclose where any construction area would be located and whether it would affect existing or planned shopping center operations.

The MND should analyze:

1. the location and size of temporary laydown areas;
2. the duration of laydown and staging;
3. construction access routes;
4. pipeline trenching, boring, or connection points;
5. whether construction would affect the road east of Chevron or other internal drive aisles;
6. whether construction would affect parking, loading, delivery routes, tenant access, pedestrian safety, or emergency access;
7. whether construction would require temporary closures, detours, or traffic control within the shopping center;
8. whether pipeline routes would cross or conflict with existing utilities, underground fuel tanks, planned utility corridors, or future retail pads;
9. whether construction would affect existing or future businesses within the commercial center; and
10. whether mitigation measures are required to avoid impacts to circulation, access, parking, safety, or business operations.

6-1 Cont'd

The MND's generalized statements regarding construction are insufficient if the eastern site remains under consideration and if project implementation may materially affect the shopping center's internal circulation and operations.

XII. The MND Should Analyze Private Internal Circulation, Not Merely Public Roadway Traffic.

The MND analyzes transportation primarily at the public roadway, traffic control plan, and VMT level. It states that the alternate location would be accessed by internal unlabeled roadways connected to Douglas Road and that operational trips would be minimal.

That analysis does not address the private internal circulation system of Anatolia Marketplace. The issue is not merely whether the project would create a significant increase in regional VMT or public roadway traffic. The issue is whether construction and operation of a compressor/M&R station within a planned retail center would affect internal drive aisles, parking, Chevron access, delivery and service movements, emergency access, pedestrian activity, customer circulation, and future retail pad development.

The MND should therefore evaluate the project's impacts to private internal circulation within Anatolia Marketplace, including the temporary and permanent effects of access roads, pipeline easements, temporary laydown areas, construction vehicles, maintenance vehicles, fencing, walls, and utility infrastructure.

XIII. The MND Should Clarify All Required Discretionary Approvals and Responsible Agency Actions.

The MND should clearly identify all discretionary approvals and responsible agency actions required to implement the eastern site. Based on the current information available to Anatolia Marketplace, implementation may require approvals or actions related to:

1. Sacramento County grading or construction approvals;
2. City of Rancho Cordova land use approvals;
3. amendment of the approved Anatolia Marketplace site plan;
4. lot line adjustment, lot merger, parcel map, or similar real property reconfiguration;
5. building, encroachment, utility, or improvement permits;
6. Sacramento Metropolitan Air Quality Management District construction or operating permits;
7. utility crossing or pipeline easement approvals;
8. CC&R amendments and related private approvals; and
9. any additional approvals required to implement the eastern site.

6-1 Cont'd

The County should ensure that all responsible agencies have been consulted and that the environmental document provides sufficient information for those agencies to rely on the County's CEQA review.

XIV. The MND Should Be Revised, and an EIR Should Be Prepared if Substantial Evidence Supports a Fair Argument of Significant Impacts.

For the reasons stated above, the MND does not provide an adequate project description or environmental setting for the eastern compressor/M&R station site. It also does not adequately analyze the potential land use, hazards, odor, air quality, noise, sensitive receptor, circulation, construction, and compatibility impacts associated with locating a compressor/M&R station and related pipeline infrastructure within Anatolia Marketplace.
At minimum, the County should require the applicant to revise the MND to:

1. accurately identify the eastern site as part of Anatolia Marketplace, an approved and partially developed retail shopping center;
2. include a site plan showing the proposed compressor/M&R station, pipeline routes, easements, laydown areas, access routes, existing tenants, future commercial pads, drive aisles, parking areas, nearby residences, and nearby park uses;
3. identify whether the eastern site is an existing legal parcel or a future parcel/pad requiring lot line adjustment, lot merger, parcel map, or other real property reconfiguration;
4. identify all fee acquisition areas, pipeline easements, temporary construction easements, access easements, and third-party approvals;
5. disclose the required amendment to the approved commercial center site plan;
6. disclose the need for CC&R amendments, Declarant approval, ARC approval, parcel-owner estoppels, or other private approvals necessary to implement the project;
7. disclose and analyze routine, periodic, emergency, and upset-condition venting and odorized gas releases;
8. provide gas dispersion analysis or other substantial evidence supporting the conclusion that odor and safety impacts would be less than significant;
9. analyze compatibility with existing and planned commercial uses, nearby residential uses, and the nearby community park;
10. analyze construction, laydown, staging, access, parking, private internal circulation, emergency access, and tenant-operation impacts;
11. identify all required discretionary approvals and responsible agency actions; and
12. adopt enforceable mitigation measures or prepare an EIR if the fair argument standard is met.

6-1
Cont'd

If the County determines that substantial evidence supports a fair argument of significant impacts regarding odor, hazards, sensitive receptors, circulation, or land use compatibility, the County may not rely on an MND and must prepare an EIR.

XV. Reservation of Rights.

These comments are based on information available during the public review period. Anatolia Marketplace reserves the right to submit additional comments, evidence, objections, and testimony as further information becomes available, including but not limited to comments on any revised MND, staff report, responses to comments, technical studies, conditions of approval, responsible agency approvals, or subsequent project revisions.

Thank you for your consideration of these comments.

Very truly yours,

AVDIS & CUCCHI, LLP

Nicholas S. Avdis

Enclosures

LETTER NO. 6: AVDIS & CUCCHI, LLP ON BEHALF OF ANATOLIA MARKETPLACE

RESPONSE 6-1

The commenter alleges that the Draft IS/MND inadequately analyzes the eastern compressor station and requests additional analysis. This compressor station site is no longer being considered by the applicant as part of the proposed project and has been removed from the proposed project description. The analysis contained in the MND remains for informational purposes and reflects greater impacts than would occur under the proposed project. All comments from the commenter are related to the optional eastern compressor site which has been removed from consideration, and the proposed project would be expected to result in fewer potential impacts than those analyzed in the MND. Therefore, the issues raised regarding that site are no longer applicable. The commenter is referred to the *Errata to the Draft IS/MND*, which includes modifications to page IS-6 of the IS/MND.

COMMENT LETTER NO. 7 – ADAMS BROADWELL JOSEPH & CARDOZO ON BEHALF OF CITIZENS FOR RESPONSIBLE INDUSTRY

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July 27, 2026

Via US Mail and Email
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Re: Comments on the Mitigated Negative Declaration for the Kiefer Landfill Gas Utilization Project (SCH 2026060539; PLER2024-00137)

Dear Mr. Smith and Ms. Newton:

We are writing on behalf of Citizens for Responsible Industry ("Citizens") to provide comments on the Mitigated Negative Declaration ("MND") prepared by the County of Sacramento ("County") for the Kiefer Landfill Gas Utilization Project (PLER2024-00137; SCH 2026060539) ("Project") proposed by Kiefer Landfill Generating III, LLC ("Applicant").[1] 7-1

The Project proposes to construct a renewable natural gas plant with capacity to generate 8,000 standard cubic-feet-per-minute at the existing Kiefer Landfill located at 12701 Kiefer Boulevard, Sacramento County, California (Assessor Parcel Numbers ("APNs"): 126-0090-020-0000 and 126-0090-021-0000); and either a 2.2 mile or 5.6-6.6 mile long pipeline connecting the plant to existing Pacific Gas &

[1] County of Sacramento, Mitigated Negative Declaration for the Kiefer Landfill Gas Utilization Project (SCH 2026060539; PLER2024-00137) (hereinafter "MND") (June 12, 2026) p. IS-4. Available at https://planningdocuments.saccounty.gov/ViewProjectDetails.aspx?ControlNum=PLER2024-00137.

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Electric ("PG&E") natural gas infrastructure in Sacramento County and the City of Rancho Cordova (APNs: 126-0090-021-0000, 126-0090-020-0000, 067-0030-078-0000, 067-0030-079-0000, and 067-2370-018-0000.)[2] 7-1 Cont'd

Citizens' comments on air quality, public health, and greenhouse gas ("GHG') impacts were prepared with the assistance of air quality and hazards expert James Clark, Ph.D. of Clark and Associates. Comments on noise impacts were prepared with the assistance of noise expert Ani Toncheva of Wilson Ihrig. Dr. Clark's comments and curriculum vitae attached to this letter as Exhibit A.[3] Ms. Toncheva's comments and curriculum vitae are included as Exhibit B.[4] Their attached comments require separate responses under CEQA. We reserve the right to supplement these comments at a later date and at any future proceedings related to this Project.[5] 7-2

Based on Citizens' review of the MND and reference documents, the record demonstrates that the MND is substantially deficient and fails to fulfill its mandate under CEQA as an informational document in several ways. The MND relies on an unsupported environmental baseline against which to measure the Project's significant impacts. The MND relies on underestimated construction workforce numbers and offers conflicting measurements distances of construction activity to sensitive receptors, resulting in underestimated health risk, air quality and noise impacts to the community. The MND also lacks a quantitative analysis of the Project's health risk from exposure to construction and operational emissions, in violation of CEQA. 7-3

Comments by Citizens' experts provide substantial evidence supporting a fair argument that the Project will result in significant air quality, public health, greenhouse gas emissions, and noise impacts that are not mitigated to less than significant levels by the proposed mitigation measures. An EIR must be prepared to address these impacts. Finally, the County failed to provide Citizens with timely access to the documents referred to and relied upon in the MND in violation of CEQA.

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[2] *Ibid.*
[3] **Exhibit A:** Letter from Dr. James Clark to Adams Broadwell Joseph & Cardozo, Comments on the Mitigated Negative Declaration for the Kiefer Landfill Gas Utilization Project (July 23, 2026) ("**Clark Comments**").
[4] **Exhibit B:** Letter from Ani Toncheva to Adams Broadwell Joseph & Cardozo, Comments on the Mitigated Negative Declaration for the Kiefer Landfill Gas Utilization Project (July 23, 2026) ("**Toncheva Comments**").
[5] Gov. Code § 65009(b); PRC § 21177(a); *Bakersfield Citizens for Local Control v. Bakersfield* ("*Bakersfield*") (2004) 124 Cal. App. 4th 1184, 1199-1203; see *Galante Vineyards v. Monterey Water Dist.* (1997) 60 Cal. App. 4th 1109, 1121.
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CEQA requires that an EIR be prepared if there is substantial evidence supporting a fair argument that any aspect of a project, either individually or cumulatively, may cause a significant effect on the environment, regardless of whether the overall effect of the project is adverse or beneficial.[6] To comply with CEQA, the County must prepare an EIR to adequately analyze and mitigate the Project's potentially significant environmental impacts before County decision makers can move forward with considering Project approval.

7-3 Cont'd

I. STATEMENT OF INTEREST

Citizens is a coalition of individuals and labor organizations with members who may be adversely affected by the potential public and worker health and safety hazards and environmental and public service impacts of the Project. The coalition includes local residents, California Unions for Reliable Energy ("CURE") and its local affiliates, and the affiliates' members who live, recreate, work, and raise families in Sacramento County and in communities near the Project site. Citizens, its participating organizations, and their members stand to be directly affected by the Project's impacts.

Since its founding in 1997, CURE has been committed to building a strong economy and healthier environment and it works to construct, operate, and maintain conventional and renewable energy power plants and other industrial facilities throughout California. CURE supports the development of clean energy and technology industries where properly analyzed and carefully planned to minimize impacts on public health and the environment. Industrial projects should avoid adverse impacts to natural resources and public health, and should take all feasible steps to ensure that unavoidable impacts are mitigated to the greatest extent feasible. Only by maintaining the highest standards can new development truly be sustainable.

7-4

The individual members of Citizens, and the members of its affiliated labor organizations, would be directly affected by the Project and may also work constructing the Project itself. They would therefore be first in line to be exposed to any health and safety hazards that may be present on the Project site. They each have a personal stake in protecting the Project area from unnecessary, adverse environmental and public health and safety impacts.

[6] CEQA Guidelines § 15063(b)(1).
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Citizens support and encourages the sustainable development of California's energy and natural resources and has an interest in enforcing environmental laws that encourage sustainable development and a safe working environment. Environmentally detrimental projects can jeopardize future jobs by making it more difficult and more expensive for business and industry to expand in the region, and by making it less desirable for businesses to locate and people to live and recreate in the County. Continued degradation can, and has, caused construction moratoriums and other restrictions on growth that, in turn, reduces future employment opportunities. 7-4 Cont'd

Finally, the organizational members of Citizens are concerned with projects that can result in serious environmental harm without providing countervailing economic benefits. CEQA provides a balancing process whereby economic benefits are weighed against significant impacts to the environment. It is in this spirit we offer these comments.

II. THE COUNTY FAILED TO COMPLY WITH CEQA'S REQUIREMENT TO PROVIDE ACCESS TO ALL DOCUMENTS REFERENCED IN THE MND DURING THE PUBLIC COMMENT PERIOD

CEQA requires that "all documents referenced" – and the CEQA Guidelines require that "all documents incorporated by reference" – in a mitigated negative declaration shall be "readily accessible to the public during the lead agency's normal working hours" during the entire public comment period.[7] Further, a CEQA document may not rely on hidden studies or documents that are not provided to the public.[8] The County is in violation of these requirements because the County has failed to provide Citizens with access to the MND reference documents 7-5

CEQA section 21092(b)(1) and CEQA Guidelines section 15072(g)(4) require that "all documents referenced" and "all documents incorporated by reference" in a negative declaration shall be "readily accessible to the public during the lead agency's normal working hours" during the entire public comment period.[9] Citizens submitted a request for access to the documents referenced in the MND on July 1, 2026 ("MND Request"). On July 9, 2026, the County provided a preliminary response to Citizens' July 1 MND Request via email stating that the Planning

[7] Pub. Resources Code § 21092(b)(1); 14 C.C.R. § 15072(g)(4); see *Ultramar v. South Coast Air Quality Man. Dist.* (1993) 17 Cal.App.4th 689, 699.
[8] *Santiago City Water District v. City of Orange* (1981) 118 Cal.App.3rd 818, 831 ("Whatever is required to be considered in an EIR must be in that formal report; what any official might have known from other writings or oral presentations cannot supply what is lacking in the report.").
[9] Pub. Resources Code § 21092(b)(1); 14 CCR § 15072(g)(4).
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Department had received the requests and determined that there are disclosable records in its possession. The County's response stated that the Planning Department was in the process of gathering and reviewing the records and, due to the voluminous amount of records, would produce them on a rolling basis.

Citizens did not receive access to the requested records. On July 9, 2026, Citizens sent a request to extend the public comment and review period and to immediately provide Citizens with access to all MND reference documents relied upon in the MND, including any construction air quality analysis used to determine the Project's air quality and health risk impacts.[10] On July 10, 2026, the County sent a revised Notice of Intent to Adopt a Mitigated Negative Declaration for the Project amending the public comment and review period to end on July 27, 2026, and stating that "The review period has been extended two weeks to provide additional time for review of analysis."[11]

7-5 Cont'd

On July 20, 2026, the County released a batch of documents partially responsive to Citizens' MND Request. However, several missing MND reference documents remain, including critical reference documents like the Project's air quality input modeling files. As of July 20, the County stated that it is "still working to provide more documents."[12] As a result, Citizens has not been provided with access to all MND reference documents during the public comment period, in violation of CEQA.

The courts have held that the failure to provide even a few pages of a CEQA document for a portion of the CEQA review period invalidates the entire CEQA process, and that such a failure must be remedied by permitting additional public comment. It is also well settled that an MND may not rely on hidden studies or documents that are not provided to the public. By failing to make all documents referenced in the MND "readily available" during the current comment period, the County is violating the clear procedural mandates of CEQA, to the detriment of Citizens and other members of the public who wish to meaningfully review and comment on the MND. The County must provide Citizens with access to the

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[10] **Exhibit C:** ABJC, Request to Extend MND Public Comment Period / Untimely Response to CEQA Reference Request - Kiefer Landfill Gas Utilization Project (SCH 2026060539; PLER2024-00137) (July 9, 2026).
[11] **Exhibit D:** Revised Notice of Intent to Adopt a Mitigated Negative Declaration for the Kiefer Landfill Gas Utilization Project (July 10, 2026)
[12] **Exhibit E:** Email from Sacramento County Public Records re: [Document Released to Requester] Sacramento County public records request #26-4446 (July 20, 2026).
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outstanding MND reference documents, and should reopen the public review and comment period on the MND for at least 30 days from the date on which the County releases these documents for public review.[13] 7-5 Cont'd

III. THE COUNTY MUST PREPARE AN ENVIRONMENTAL IMPACT REPORT TO COMPLY WITH CEQA

CEQA requires that lead agencies analyze any project with potentially significant environmental impacts in an EIR.[14] "Its purpose is to inform the public and its responsible officials of the environmental consequences of their decisions before they are made. Thus, the EIR protects not only the environment, but also informed self-government."[15] The EIR has been described as "an environmental 'alarm bell' whose purpose it is to alert the public and its responsible officials to environmental changes before they have reached ecological points of no return."[16]

CEQA's purpose and goals must be met through the preparation of an EIR, except in certain limited circumstances.[17] CEQA contains a strong presumption in favor of requiring a lead agency to prepare an EIR. This presumption is reflected in the "fair argument" standard. Under that standard, a lead agency "shall" prepare an EIR whenever substantial evidence, in the whole record before the agency supports a fair argument that a project may have a significant effect on the environment.[18] 7-6

In contrast, a mitigated negative declaration may be prepared only when, after preparing an initial study, a lead agency determines that a project may have a significant effect on the environment, but:

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[13] This Project has a 30-day public comment period, pursuant to 14 CCR § 15105(b).
[14] *See* Pub. Resources Code, § 21000; CEQA Guidelines, § 15002.
[15] *Citizens of Goleta Valley v. Bd. of Supervisors* ("*Goleta Valley*") (1990) 52 Cal.3d 553, 564, internal citations omitted.
[16] *County of Inyo v. Yorty* (1973) 32 Cal.App.3d 795, 810.
[17] *See* Pub. Resources Code, § 21100
[18] Pub. Resources Code, §§ 21080, subd. (d), 21082.2, subd. (d); CEQA Guidelines, §§ 15002, subd. (k)(3), 15064, subds. (f)(1), (h)(1); *Laurel Heights Improvement Assn. v. Regents of the Univ. of Cal.* ("*Laurel Heights II*") (1993) 6 Cal.4th 1112, 1123; *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68, 75, 82; *Stanislaus Audubon Society, Inc. v. County of Stanislaus* (1995) 33 Cal.App.4th 144, 150-151; *Quail Botanical Gardens Found., Inc. v. City of Encinitas* ("*Quail Botanical*") (1994) 29 Cal.App.4th 1597, 1601- 1602.
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(1) revisions in the project plans or proposals made by, or agreed to by, the applicant before the proposed negative declaration and initial study are released for public review *would avoid the effects or mitigate the effects to a point where clearly no significant effect on the environment would occur*; and,
(2) there is *no substantial evidence* in light of the whole record before the public agency that the project, as revised, *may* have a significant effect on the environment.[19]

Courts have held that if "no EIR has been prepared for a nonexempt project, but substantial evidence in the record supports a fair argument that the project may result in significant adverse impacts, the proper remedy is to order preparation of an EIR."[20] The fair argument standard creates a "low threshold" favoring environmental review through an EIR, rather than through issuance of a negative declaration.[21] An agency's decision not to require an EIR can be upheld only when there is no credible evidence to the contrary.[22]

7-6 Cont'd

"Substantial evidence" required to support a fair argument is defined as "enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached."[23] According to the CEQA Guidelines, when determining whether an EIR is required, the lead agency is required to apply the principles set forth in Section 15064, subdivision (f):

> [I]n marginal cases where it is not clear whether there is substantial evidence that a project may have a significant effect on the environment, the lead agency shall be guided by the following principle: If there is disagreement among expert opinion supported by facts over the significance of an effect on the environment, the Lead Agency shall treat the effect as significant and shall prepare an EIR.[24]

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[19] Pub. Resources Code, § 21064.5 (emphasis added).
[20] *See, e.g., Communities for a Better Environment v. South Coast Air Quality Management Dist.* (2010) 48 Cal.4th 310, 319-320.
[21] *Citizens Action to Serve All Students v. Thornley* (1990) 222 Cal.App.3d 748, 754
[22] *Sierra Club v. County of Sonoma* (1992) 6 Cal.App.4th, 1307, 1318; *see also Friends of B Street v. City of Hayward* (1980) 106 Cal.App.3d 988, 1002 ("*Friends of B Street*") ("If there was substantial evidence that the proposed project might have a significant environmental impact, evidence to the contrary is not sufficient to support a decision to dispense with preparation of an EIR and adopt a negative declaration, because it could be 'fairly argued' that the project might have a significant environmental impact").
[23] CEQA Guidelines, § 15384, subd. (a).
[24] Pub. Resources Code, § 21064.5.
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Furthermore, CEQA documents, including EIRs and MNDs, must mitigate significant impacts through measures that are "fully enforceable through permit conditions, agreements, or other legally binding instruments."[25] Deferring formulation of mitigation measures to post-approval studies is generally impermissible.[26] Mitigation measures adopted after Project approval deny the public the opportunity to comment on the Project as modified to mitigate impacts.[27] If identification of specific mitigation measures is impractical until a later stage in the Project, specific performance criteria must be articulated and further approvals must be made contingent upon meeting these performance criteria.[28] Courts have held that simply requiring a project applicant to obtain a future report and then comply with the report's recommendations is insufficient to meet the standard for properly deferred mitigation.[29]

7-6
Cont'd

With respect to this Project, the MND fails to satisfy the basic purposes of CEQA. The MND fails to adequately disclose, investigate, and analyze the Project's potentially significant impacts, and fails to provide substantial evidence to conclude that impacts will be mitigated to a less than significant level. Because the MND lacks basic information regarding the Project's potentially significant impacts, the MND's conclusion that the Project will have a less than significant impact on the environment is unsupported.[30] Moreover, substantial evidence shows that the Project may result in potentially significant impacts that are not reduced to less than significant levels with the mitigation measures included in the MND. Therefore, a fair argument can be made that the Project may cause significant impacts requiring the preparation of an EIR.

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[25] CEQA Guidelines, § 15126.4, subd. (a)(2).
[26] *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 308-309; Pub. Resources Code, § 21061.
[27] *Gentry v. City of Murrieta* (1995) 36 Cal.App.4th 1359, 1393; *Quail Botanical, supra*, 29 Cal.App.4th at pg. 1604, fn. 5.
[28] *Id.*
[29] *Id.*
[30] Pub. Resources Code, § 21064.5.
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A. An EIR is Required for the Project Because There is Substantial Evidence Supporting a Fair Argument that the Project Has Significant, Unmitigated Air Quality Impacts

1. NOx Emissions

The MND concludes that nitrogen oxides ("NOx") emissions from Project construction are less than significant.[51] Pursuant to SMAQMD regulations, NOx emissions from a Project are significant if NOx emissions exceed 85 lbs/day during construction and 65 lbs/day during Project operation. The MND states that the Project's construction emissions could be approximately 84.12 lbs/day. Based on this calculation, the MND finds that Project construction will not result in significant air quality impacts. However, this conclusion is not supported by substantial evidence, and Dr. Clark's comments provide substantial evidence supporting a fair argument that the Project may have significant air quality impacts that the MND fails to address. 7-7

Dr. Clark identified significant errors in the Air Quality analysis leading to underestimated NOx emissions. First, according to the MND's Project Description, the on-site workforce would generally range between 100 and 150 daily workers during the height of Project construction.[52] However, Dr. Clark found that the air quality modeling completed for the Project omits all commute trips for the workforce on the RNG plant's building phase, resulting in an undercount of as many as 300 one way trips per day.[53] Additionally, the MND states that pipeline construction would generate an additional 50 trips per day during its peak.[54] However, the air quality modeling for the pipeline construction phase assumed a total 0.00 one-way vendor trips per day and 0.00 one-way hauling trips per day.[55]

By correcting the inputs in the air quality modeling to match the MND's Project Description, Dr. Clark found that NOx emissions are expected to be approximately 90 pounds per day, roughly six percent above the threshold.[56] This is

[51] MND, p. IS-32.
[52] MND, p. IS-7.
[53] Clark Comments, p. 5.
[54] MND, p. IS-8.
[55] Clark Comments, p. 6.
[56] Clark Comments, p. 7.
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a significant project-level impact that the MND fails to disclose or mitigate. According to the MND, an exceedance of the SMAQMD daily NOx threshold is also a cumulatively considerable contribution to the region's ozone nonattainment.[37]

Dr. Clark's comments also demonstrate that the MND's determination that the Project will not exceed SMAQMD NOx emissions thresholds is unsupported.[38] Dr. Clark's comments provide substantial evidence that the Project will result in significant and unmitigated NOx emissions.[39] The County must prepare an EIR for the Project which includes an accurate analysis of the Project's NOx emissions, and mitigate NOx emissions to the greatest extent feasible, before the Project can proceed. 7-7 Cont'd

In order to reduce the Project's significant air quality impacts, Dr. Clark explains that a Tier 4 Final fleet requirement for Project construction equipment, or alternatively, a requirement to implement SMAQMD's enhanced exhaust control practices, are feasible mitigation measures that should be considered by the County. The efficacy of these mitigation measures must be analyzed in an EIR.

2. Fugitive VOC and Methane Emissions

The MND explains that the Project emission byproducts include VOCs and methane. However, the MND fails to disclose or mitigate potentially significant fugitive emissions that would be released during Project operation.

Dr. Clark's review of the MND demonstrated that the MND's operational inventory contains no component fugitives of any kind: no valve, flange, connector, or seal leaks for the plant, no station fugitives, no pig launcher or receiver losses, and no blowdown or maintenance venting, although the Initial Study acknowledges pipeline gas clearance procedures and periodic depressurization,[40] and the PTE Memo concedes its regulated GHG figure excludes fugitives.[41] 7-8

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[37] MND, pp. IS-29 and IS-32; Pipeline Emissions Study § 2.4 (SMAQMD thresholds "represent maximum emissions levels for new development required to support attainment of the NAAQS and CAAQS").
[38] Clark Comments, p. 8.
[39] *Id.*
[40] IS/MND at IS-37; Clark Comments, p. 18.
[41] Clark Comments, p. 18, citing IAppendix A, PTE Memo at 7 ("this facility's regulated GHGs (excluding fugitive emissions)").
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Dr. Clark explains that component-count emission factors for gas processing and transmission are routine, and their omission from the MND's air modeling results in underestimated ROG emissions in a severe ozone nonattainment area[42] and fugitive methane emissions (a GHG) from a Project whose central claim is methane reduction.[43] Dr. Clark further explains that fugitive emissions require a leak detection and repair ("LDAR") mitigation program, which is entirely missing from the MND.[44] EPA guidance defines the elements of an effective LDAR program and recommends leak detection with automatic operator notification for RNG facilities;[45] an enforceable measure specifying periodic optical gas imaging or EPA Method 21 monitoring, leak thresholds, repair deadlines, and annual reporting is feasible mitigation that remains unadopted. 7-8 Cont'd

The County must prepare an EIR which quantifies and discloses the Project's fugitive ROG and methane emissions, and which implements an LDAR program to detect and reduce fugitive emissions to less than significant levels.

B. The County Failed to Analyze the Health Risk Impacts from Exposure to the Project's Air Emissions

CEQA requires analysis of human health impacts. CEQA Guidelines Section 15065(a)(4) provides that the County is required to find a project will have a significant impact on the environment and prepare an EIR if the environmental effects of a project will cause a substantial adverse effect on human beings.[46] The Supreme Court has also explained that CEQA requires the lead agency to disclose the health consequences that result from exposure to a project's air emissions.[47] Courts have held that an environmental review document must disclose a project's potential health risks to a degree of specificity that would allow the public to make the correlation between the project's impacts and adverse effects to human health.[48] 7-9

In *Bakersfield Citizens for Local Control v. City of Bakersfield*, the court found that the EIR's description of health risks were insufficient and that after reading them, "the public would have no idea of the health consequences that result

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[42] IS/MND at IS-28.
[43] Clark Comments, p. 18.
[44] *Id.*
[45] U.S. EPA, Leak Detection and Repair: A Best Practices Guide (Oct. 2007); U.S. EPA, Renewable Natural Gas: Facility Operation Best Practices to Create a More Climate-Friendly Project (Aug. 2022).
[46] PRC § 21083(b)(3), (d).
[47] *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 516, 523.
[48] *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184.
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when more pollutants are added to a nonattainment basin."[49] Likewise, in *Sierra Club*, the California Supreme Court held that the EIR's discussion of health impacts associated with exposure to the named pollutants was too general and the failure of the EIR to indicate the concentrations at which each pollutant would trigger the identified symptoms rendered the report inadequate.[50] Some connection between air quality impacts and their direct, adverse effects on human health must be made. As the Court explained, "a sufficient discussion of significant impacts requires not merely a determination of whether an impact is significant, but some effort to explain the nature and magnitude of the impact."[51] CEQA mandates discussion, supported by substantial evidence, of the nature and magnitude of impacts of air pollution on public health.[52]

7-9
Cont'd

For development projects like this one, the Office of Environmental Health Hazard Assessment's ("OEHHA") risk assessment guidelines recommend a formal health risk analysis ("HRA") for short-term construction exposures to TACs lasting longer than 2 months and exposures from projects lasting more than 6 months should be evaluated for the duration of the project.[53] In an HRA, lead agencies must first quantify the concentration released into the environment at each of the sensitive receptor locations through air dispersion modeling, calculate the dose of each TAC at that location, and quantify the cancer risk and hazard index for each of the chemicals of concern. Following that analysis, then the County can make a determination of the relative significance of the emissions.

Here, the MND fails to quantify sensitive receptors' exposure to TACs and compare the impact to the County's quantitative threshold. As such, no connection between the Project's emissions and their direct, adverse effects on human health has been made.[54] Instead, the MND flatly concludes that Project construction will not expose sensitive receptors to substantial pollutant concentrations from construction equipment based on the temporary and intermittent nature of construction activities, existing regulatory controls on diesel equipment and trucks,

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[49] *Id.* at 1220.
[50] *Sierra Club*, at 521.
[51] *Id.* at 519, citing *Cleveland National Forest Foundation v. San Diego Assn. of Governments* (2017) 3 Cal.5th 497, 514–515.
[52] *Sierra Club*, 6 Cal.5th at 518–522.
[53] Office of Environmental Health Hazard Assessment (OEHHA), Risk Assessment Guidelines: Guidance Manual for Preparation of Health Risk Assessments, February 2015 (OEHHA 2015), Section 8.2.10: Cancer Risk Evaluation of Short Term Projects, pp. 8-17/18; https://oehha.ca.gov/air/crnr/notice-adoption-air-toxics-hot-spots-program-guidance-manual-preparation-health-risk-0.
[54] *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184.
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and the dispersive characteristics of diesel exhaust.[55] This conclusion is not supported by substantial evidence and does not support the County's reliance on an MND.

Dr. Clark explains that diesel particulate matter ("DPM") is a toxic air contaminant and it is the pollutant that drives cancer risk at most construction sites near homes.[56] According to the Air Quality and Greenhouse Gas Study ("Air Quality Study") prepared for the Project, the nearest receptors are approximately 800 feet from the compressor station and also states that "[t]here may be other sensitive receptors located near the pipeline construction [...] However, pipeline construction activities will move along a linear path, only briefly exposing any sensitive receptors for a very short duration."[57] Based on these assumptions, the MND concludes that the Project will not expose sensitive receptors to substantial pollutant concentrations.[58] However, this conclusion is not supported by substantial evidence, and the MND provides conflicting information to show that Project construction will take place in close proximity to existing residences and for prolonged durations.

7-9 Cont'd

For example, the MND's noise analysis specifies that large earthmoving equipment will be placed 15 feet from the nearest single-family residences along Fiorenza Lane and 35 feet from residences along Andria Lane during pipeline construction.[59] Additionally, the MND specifies that a drill rig and generator set will be placed approximately 70 feet from residences along Andria Lane to complete the horizontal direction drilling ("HDD") bore under the Folsom South Canal, and will conduct additional HDD bores 195 to 450 feet from homes.[60] Table IS-19 places the alternate compressor station site approximately 130 feet from the nearest residential property line, and Pipeline Option 2B construction occurs within 100 feet of the Tricon Sunridge residential community.[61] With regard to the duration of the construction, the HDD bores under Blodgett Reservoir, Laguna Creek, the Folsom South Canal, and the roadway crossings will require a stationary diesel engine operation lasting days to weeks while compressor station construction will take place at a fixed location for approximately six months, and the RNG plant construction will take place over fourteen months.[62]

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[55] MND, p. IS-36.
[56] Clark Comments, p. 11.
[57] MND, Appendix A, pdf. p. 95.
[58] *Ibid.*
[59] MND, pp. IS-113 – IS-114.
[60] MND, pp. IS-113 – IS-114.
[61] MND, p. IS-116.
[62] MND, pp. IS-7 – IS-8.
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As noted above, OEHHA recommends a formal Health Risk Assessment for construction exposures lasting longer than 2-months, and "[e]xposures from projects lasting more than 6 months should be evaluated for the duration of the project."[63] Here, the proposed Project construction will last approximately 14 months, which is significantly longer than the two-month short-term threshold set by OEHHA to trigger an HRA. Additionally, because Project construction will last more than six months, the OEHHA guidance specifies that cancer exposure from Project construction "should be evaluated for the duration of the project."[64] This analysis was not completed for the Project, and the County lacks substantial evidence to conclude that Project construction will not result in a significant health risk impact. The County must prepare a quantitative health risk analysis that quantifies and evaluates the health risks from Project construction and provide the results of the study in an EIR for the Project. 7-9 Cont'd

C. An EIR is Required for the Project Because There is Substantial Evidence Supporting a Fair Argument that the Project May Have Significant Hazards Impacts

The MND concludes that the Project's impacts related to hazards and hazardous materials will be less than significant.[65] However, Dr. Clark's comments demonstrate that the MND fails to disclose, analyze, and propose mitigation for several potentially significant sources of hazards that could arise during both construction and operation of the Project.[66] 7-10

First, the MND entirely omits discussion of risk scenarios associated with the proposed 6.6-mile gas pipeline and the compressor station. In his review, Dr. Clark found that the MND fails to disclose pipeline size and operating pressures and the potential impact radii in the event of a pipeline explosion. Additionally, the MND fails to identify high consequence areas, and evaluate release consequences for the receptors.

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[63] Office of Environmental Health Hazard Assessment (OEHHA), Risk Assessment Guidelines: Guidance Manual for Preparation of Health Risk Assessments, February 2015 (OEHHA 2015). Section 8.2.10: Cancer Risk Evaluation of Short Term Projects, pp. 8-17/18; https://oehha.ca.gov/air/crnr/notice-adoption-air-toxics-hot-spots-program-guidance-manual-preparation-health-risk-0.
[64] OEHHA 2015 p. 8-18.
[65] MND, p. IS-91.
[66] Clark Comments, pp. 23-27.
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For illustration, Dr. Clark explains that a 12-inch gas pipeline typically operates at 400 psig and in the event of a failure could result in an impact radius of approximately 166 feet, while a 6-inch line operating at 800 psig could result in an impact radius of approximately 117 feet.[67] According to the MND, construction work on the pipeline proposed under Option 2 will be within 15 and 35 feet from existing homes along Fiorenza and Andria Lanes respectively.[68] Based on these distances, Dr. Clark concludes that occupied residences will likely be within the impact radius of the pipeline.

7-10 Cont'd

Second, according to the MND, the Alternate Compressor option would locate gas compression and metering equipment 130 feet from homes and directly adjacent to a retail gasoline station. However, the MND fails to provide a facility-siting or hazard-interaction analysis. Dr. Clark explains that co-locating a natural gas compression and metering facility beside an operating retail gasoline storage and dispensing site creates hazard interactions that must be evaluated.[69]

Third, pursuant to the CEQA Guidelines Appendix G Environmental Checklist item IX the MND must address whether the Project would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.[70] In response to this requirement, the MND concludes that the Project will have "No Impact," stating that Sunrise Elementary School is "approximately 0.3 miles (1,584 feet) from the alternative compressor station site."[71] This conclusion is not based on substantial evidence, and it is a demonstrable fact that Sunrise Elementary School is less than .25 miles (1,320 feet) from the alternate location.

7-11

As seen in Figure 1 below, the Alternate Compressor Station is proposed to be located southeast of Douglas Road and Sunrise Boulevard in the City of Rancho Cordova.[72]

[67] Clark Comments, p. 23.
[68] MND, p. IS-118.
[69] Clark Comments, p. 24.
[70] CEQA Guidelines, Appendix G: IX (c).
[71] MND, p. IS-93.
[72] MND, p. IS-17.
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Figure 1: MND, p. IS-17: Proposed Compressor Station Options



7-11
Cont'd

By using the distance measurement tool available through Google Maps, Citizens determined that the proposed Alternate Compressor Station location is approximately 1,150 feet from Sunrise Elementary School as seen in Figure 2 below.

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Fig. 2: Google Map Measurement of Distance from Approximate Compressor Station Location to Sunrise Elementary School



7-11
Cont'd

According to the measurement in Figure 2, the Alternate Compressor Station will be approximately 1,130 feet from Sunrise Elementary School. As a result, the MND's conclusion that the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school lacks substantial evidence. The County must prepare an EIR for the Project that accurately measures the distance between existing schools and the Project's proposed infrastructure and includes an analysis of whether the Project would result in significant hazards impacts.

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For these reasons, the MND lacks substantial evidence to support its significance determination, and there is substantial evidence supporting a fair argument that the Project may result in significant impacts related to hazards. The County must prepare an EIR for the Project to address these hazards to the local community. 7-11 Cont'd

D. An EIR is Required for the Project Because There is Substantial Evidence Supporting a Fair Argument that the Project May Have Significant Noise Impacts

1. The MND Fails to Accurately Describe the Existing Environmental Setting Related to Noise

The MND fails to adequately describe the environmental setting against which the Project's impacts are to be measured. This contravenes the fundamental purpose of the environmental review process, which is to determine whether there is a potentially substantial, adverse change compared to the existing setting.[73] CEQA requires that a lead agency include a description of the physical environmental conditions, or "baseline," in the vicinity of the project as they exist at the time environmental review commences.[74] As the courts have repeatedly held, the impacts of a project must be measured against the "real conditions on the ground."[75] The description of the environmental setting constitutes the "baseline" physical conditions against which the lead agency assesses the significance of a project's impacts.[76] An environmental setting is required "to give the public and decision makers the most accurate and understandable picture practically possible of the project's likely near-term and long-term impacts.[77] 7-12

Ms. Toncheva found that the County failed to conduct any measurements to establish baseline noise in the area of the Project against which to measure the Project's noise impacts.[78] When baseline noise conditions are not established, decision-makers cannot effectively determine whether the Project complies with

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[73] 14 C.C.R. § 15063(d).
[74] 14 C.C.R. § 15063(d)(2); see *Communities for a Better Environment v. South Coast Air Quality Management Dist.* (2010) 48 Cal. 4th 310, 321.
[75] *Communities for a Better Environment v. South Coast Air Quality Management Dist.* (2010) 48 Cal. 4th 310, 321.; *Save Our Peninsula Com. V. Monterey County Bd. Of Supervisors* (2001) 87 Cal.App.4th 99, 121-22; *City of Carmel-by-the-Sea v. Bd. Of Supervisors of Monterey County* (986) 183 Cal.App.3d 229, 246.
[76] 14 C.C.R. § 15063(d)(2); see 14 C.C.R. § 15125 *Communities for a Better Environment v. South Coast Air Quality Management Dist.*, 48 Cal. 4th at 321.
[77] 14 C.C.R. § 15125(a).
[78] Toncheva Comments, p. 3.
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noise regulations nor identify any potential adverse effects resulting from Project-generated noise increases on the surrounding environment and communities.[79] Without knowing how loud the environment is, it is impossible to determine if the Project will increase noise in the surrounding community.[80]

The MND relies on ambient noise measurements for major roadways in the City of Rancho Cordova's 2006 General Plan to establish the existing noise baseline.[81] The MND adjusts these levels for distance to receptors closest to the roadway, not those that are closest to the project. Ms. Toncheva found that the receptors closest to the Project's pipeline construction would be much further away from the roadway source and ambient noise levels would be quieter.[82] For example, the houses along Andria Lane are well beyond the 241-ft distance to the 60 dB contour shown in the General Plan.[83] In order to accurately measure the Project's construction noise impacts, the existing noise levels should be confirmed with measurements at receivers near the Project elements, and not rely on a 20 year old roadway noise contour. Because the MND fails to analyze the ambient noise levels at the Project site, the baseline noise levels used for analyzing the Project's noise impacts cannot be relied on.[84]

7-12
Cont'd

To remedy these inadequacies, Ms. Toncheva explains that the County should "conduct properly documented ambient measurements at sensitive receptors near project elements that fully capture the current baseline conditions during full daytime and nighttime hours to determine impact of construction and operational noise."[85] Without conducting the analysis of ambient noise recommended by Ms. Toncheva, the MND lacks an adequate description of the existing noise environment at the Project site, which precludes an accurate assessment of the Project's noise impacts. This data should be included in an EIR prepared for public review.

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[79] *Ibid.*
[80] *Ibid.*
[81] MND, p. IS-115.
[82] Toncheva Comments, p. 3.
[83] *Ibid.*
[84] *Id.*
[85] *Id.*
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2. The IS/MND's Construction Noise Threshold is Not Supported by Substantial Evidence

The IS/MND provides that construction noise impacts would be significant if they exceed 80 dBA at sensitive receptors, a maximum noise level.[86] CEQA requires that a lead agency's significance thresholds be supported by substantial evidence.[87] This threshold is not supported by substantial evidence because it fails to account for the increase in noise over existing ambient noise levels, which is necessary to determine the severity of the noise impact. Analysis of this consideration is called for in Appendix G of the CEQA Guidelines, which provides that the Project would cause a significant noise impact if it would result in "[g]eneration of a *substantial temporary or permanent increase in ambient noise* levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies." Accordingly, courts have held that "the lead agency should consider both the increase in noise level and the absolute noise level associated with a project."[88] 7-13

The courts have held that reliance on a maximum noise level as the sole threshold of significance for noise impacts violates CEQA because it fails to consider whether the magnitude of changes in noise levels is significant.[89] In *Keep our Mountains Quiet v. County of Santa Clara*,[90] neighbors of a wedding venue sued over the County of Santa Clara's failure to prepare an EIR for a proposed project to allow use permits for wedding and other party events at a residential property abutting an open space preserve. Neighbors and their noise expert contended that previous events at the facility had caused significant noise impacts that reverberated in neighbors' homes and disrupted the use and enjoyment of their property.[91] Similar to the MND's construction noise threshold in this case, the County's EIR relied on the noise standards set forth in its noise ordinance as its thresholds for significant noise exposure from the project, deeming any increase to be insignificant so long as the absolute noise level did not exceed those standards.[92] The Court examined a long line of CEQA cases which have uniformly held that conformity with land use regulations is not conclusive of whether or not a project

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[86] MND, p. IS-108.
[87] CEQA Guidelines § 15064.7.
[88] *Keep Our Mountains Quiet v. County of Santa Clara* (2015) 236 Cal.App.4th 714, 733; see *King and Gardiner Farms, LLC v. County of Kern* (2020) 45 Cal.App.5th 814, 894 (citing *Keep Our Mountains Quiet*).
[89] *King & Gardiner Farms, LLC*, 45 Cal.App.5th at 865.
[90] *Keep our Mountains Quiet v. County of Santa Clara* (2015) 236 Cal.App.4th 714.
[91] *Id.* at 724.
[92] *Id.* at 732.
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has significant noise impacts[93] in holding that the County's reliance on the project's compliance with noise regulations did not constitute substantial evidence supporting the County's finding of no significant impacts.[94]

In *King and Gardiner Farms, LLC v. County of Kern*,[95] the Court of Appeal cited *Keep our Mountains Quiet* and decisions cited therein when it rejected the use of a single "absolute noise level" threshold of significance (construction and operational noise impacts were only deemed significant if they exceeded 65 dBA CNEL) on the grounds that the sole use of such a threshold fails to consider the magnitude or severity of increases in noise levels attributable to the project in different environments. The Court explained the lead agency failed to "refer to evidence showing why the magnitude of an increase was irrelevant in determining the significance of a change in noise."[96]

7-13 Cont'd

Here, the MND's construction noise threshold violates CEQA because it fails to consider the magnitude of increases in noise over ambient levels. But, as in *King and Gardiner Farms*, the MND fails to refer to substantial evidence showing why the magnitude of the increase over ambient levels is irrelevant. Per *Keep our Mountains Quiet*, conformity with land use regulations is not conclusive of whether or not a project has significant noise impacts.

Thus, the MND's reliance on an 80 dBA significance threshold is not supported by substantial evidence, and does not adequately disclose the severity of the Project's noise impacts. An EIR must be prepared that applies a legally adequate threshold that accounts for increase over ambient levels.

3. The Project's Construction Noise Impacts Are Significant and Unmitigated

7-14

The MND's noise analysis discloses that Project construction would result in significant noise impacts, but concludes that, with the implementation of mitigation

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[93] *Id., citing Citizens for Responsible & Open Government v. City of Grand Terrace* (2008) 160 Cal.App.4th 1323, 1338; *Oro Fino Gold Mining Corp. v. County of El Dorado* (1990) 225 Cal.App.3d 872, 881–882; *Gentry v. City of Murrieta* (1995) 36 Cal.App.4th 1359, 1416 (project's effects can be significant even if "they are not greater than those deemed acceptable in a general plan"); *Environmental Planning & Information Council v. County of El Dorado* (1982) 131 Cal.App.3d 350, 354, ("CEQA nowhere calls for evaluation of the impacts of a proposed project on an existing general plan").

[94] *Id.* at 732-734; see also *King & Gardiner Farms, LLC v. County of Kern* (2020) 45 Cal.App.5th 814, 893, as modified on denial of rehearing (Mar. 20, 2020).

[95] *King and Gardiner Farms, LLC, supra*, 45 Cal.App.5th 814.

[96] *Id.* at 894.

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measures, noise impacts will be less than significant. In her review, Ms. Toncheva found that the MND fails to properly disclose, analyze and mitigate the Project's potentially significant construction noise impacts and, despite implementation of the proposed mitigation measures, Project construction noise will likely exceed the MND's threshold of 80 dBA.

The construction noise analysis for the Project references the Federal Transit Administration ("FTA") *Transit Noise and Vibration Impact Assessment Manual*.[97] Ms. Toncheva explains that the FTA methodology is commonly completed using the Roadway Construction Noise Model ("RCNM") published by the Federal Highway Administration ("FHWA").[98]

Ms. Toncheva states that the FTA *Manual* presents two options for assessing construction noise: Option A – General Assessment and Option B – Detailed Assessment. Regarding these options, the *Manual* states:[99]

7-14
Cont'd

- A general assessment of construction noise is warranted for projects in an early assessment stage when the equipment roster and schedule are undefined and only a rough estimate of construction noise levels is practical.
- A detailed analysis of construction noise is warranted when many noise-sensitive sites are adjacent to a construction project or where contractors are faced with stringent local ordinances or heightened public concerns expressed in early outreach efforts.[100]

The General Assessment analyzes the noise generated by the two noisiest pieces of equipment expected for each phase of a Project and assumes all equipment operates at the center of the project site at a usage factor of 100%.[101] Conversely, the Detailed Assessment specifies that noise levels should be calculated using the closest distance between receptors and construction equipment for all equipment expected to be used in each phase of construction.[102] In her review, Ms. Toncheva found that the noise analysis relies on usage factors as directed under the Detailed Assessment but only analyzes the two noisiest pieces of equipment as required under the General Assessment methodology.[103] As a result, the MND's noise analysis underestimates the Project's construction noise impacts. Ms. Toncheva

[97] Toncheva Comments, p. 4.
[98] Toncheva Comments, p. 6.
[99] Toncheva Comments, p. 6.
[100] Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual (September 2018) p. 177.
[101] Toncheva Comments, p. 6.
[102] *Ibid.*
[103] Toncheva Comments, p. 6.
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corrected the analysis using the equipment list provided in the MND's Air Quality Study, and found that under the General, and Detailed Assessment methods, Project construction noise impacts will be higher than the 92 dBA reported in the MND.[104] Based on Ms. Toncheva's calculations, the predicted noise levels are 16 to 20 dB above the FTA threshold adopted by the Project and 36 to 40 dB above an ambient of 60 dBA.[105] This is a more severe noise impact that the County disclosed.

Finally, Ms. Toncheva found that implementation of Mitigation Measure NOI-1 would not reduce these levels to less than significant, finding that a permanent solid barrier could provide up to 12 dB reduction, while a temporary construction noise barrier or blanket could provide 5-8 dB reduction.[106] These reductions do not fully mitigate the noise increases disclosed in the MND or the noise increases calculated by Ms. Toncheva, resulting in ongoing significant impacts even after MM NOI-1 measures are implemented. 7-14 Cont'd

The County must prepare an EIR to properly analyze the potentially significant construction noise impacts from the Project, disclose the Project's potentially significant noise impacts, and propose feasible, effective, mitigation measures to reduce the Project's significant impacts.

4. The MND Lacks Substantial Evidence to Conclude That the Project's Noise Impacts Will Be Less Than Significant

The MND estimates that noise levels at nearby sensitive receptors will be up to 93 dBA during pipeline construction and acknowledges that these levels would exceed the 80 dBA threshold applicable to the Project.[107] However, the MND concludes that with implementation of Mitigation Measure N-1 the noise impacts to sensitive receptors would be reduced to less than significant levels.[108] 7-15

Under CEQA, the lead agency is required to consider both the "absolute noise level" associated with a project and the increase in the noise level resulting from the project when evaluating noise impacts.[109] This dual consideration is essential to fully understand the potential consequences of the Project's noise on the surrounding environment.

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[104] Toncheva Comments, p. 6.
[105] Toncheva Comments, pp. 6-7.
[106] Toncheva Comments, p. 5.
[107] MND, p. IS-112.
[108] *Ibid.*
[109] *King & Gardiner Farms, LLC v. County of Kern* (2020) 45 Cal.App.5th 814, 887, 893; *Keep Our Mountains Quiet v. County of Santa Clara* (2015) 236 CA4th 714, 733.
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The MND does not adequately address either of these requirements. First, the MND fails to provide sound mapping or estimates of the existing noise conditions at the Project site. According to the Glenn County Noise Ordinance, a significant impact will occur if "the ambient noise level is already above the standards contained in [the noise element], or the project will result in an increase in ambient noise levels by more than 3 dB, whichever is greater."[110] The site is currently developed with a walnut processing facility and surrounding orchards.[111] The proposed Project will add 24 hour operation of an ATC facility to this existing use.[112] Because of this, the existing noise baseline must be considered to properly assess the potential incremental impacts of the Project. Without understanding the current noise environment, it is impossible to determine how the Project will affect noise levels relative to the existing conditions. 7-15 Cont'd

Second, the MND does not provide estimates of the Project's expected noise levels. Without these estimates, it is impossible to determine whether the noise generated by construction activities or ongoing operations will exceed the applicable noise thresholds set forth in the Sacramento County General Plan and City of Rancho Cordova Code of Ordinances.

To address these deficiencies and comply with CEQA, an EIR must be prepared that provides a comprehensive and quantitative analysis of both the absolute noise levels and the potential increase in noise over ambient conditions.

IV. CONCLUSION

For the reasons discussed herein, the MND for the Project is inadequate under CEQA as it fails to provide legally adequate analysis of, and mitigation for, all of the Project's potentially significant impacts. Moreover, substantial evidence supports a fair argument that the Project's impacts may be significant and unmitigated. Due to the MND's deficiencies, the County cannot conclude that the Project's impacts have been mitigated to a less than significant level. 7-16

The CEQA Guidelines require that an EIR be prepared if there is substantial evidence supporting a fair argument that any aspect of a project, either individually or cumulatively, may cause a significant effect on the environment, regardless of whether the overall effect of the project is adverse or beneficial.[113] As discussed in

[110] General Plan, p. N-2.
[111] Staff Report, p. 5.
[112] MND, p. 11.
[113] CEQA Guidelines § 15063(b)(1).
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detail above, there is a fair argument based on substantial evidence that the Project would result in significant adverse impacts not identified in the MND. An EIR is therefore required for the Project before the County can consider approving the Project's grading permit. 7-16 Cont'd

Thank you for your attention to these comments. Please include them in the record of proceedings for the Project.

Sincerely,

Kevin Carmichael

KTC:ljl

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EXHIBIT A

7-17

EXHIBIT B

7-17 Cont'd

EXHIBIT C

7-17 Cont'd

EXHIBIT D

7-17 Cont'd

EXHIBIT E | 7-17 Cont'd

LETTER 7: ADAMS BROADWELL JOSEPH & CARDOZO ON BEHALF OF CITIZENS FOR RESPONSIBLE INDUSTRY

RESPONSE 7-1

The commenter includes introductory remarks noting this comment letter is written on behalf of the Citizens for Responsible Industry and provides a brief summary of the proposed project. No response to this comment is warranted.

RESPONSE 7-2

The commenter describes those who provided assistance with the comments in the letter and asserts that the attached comments require separate responses under CEQA. CEQA does not require the preparation of responses to comments on an IS/MND. In this case, the County has chosen to prepare responses to the environmental issues raised by commenters. As the exhibits are provided in support of the comment letter, the responses are directed to comments on the Draft IS/MND and not to the attachments. No further response to this comment is required.

RESPONSE 7-3

The commenter provides a summary of their alleged deficiencies of the MND and asserts that an Environmental Impact Report (EIR) must be prepared. The commenter's specific concerns are included in the subsequent Comment No. 7-6 through 7-15. Refer to Response Nos. 7-6 through 7-15 for specific responses to such concerns. As demonstrated in those responses, the project would not result in any significant impacts (including those related to air quality, public health, greenhouse gas emissions, and noise) and there is no substantial evidence supporting a fair argument to the contrary. Therefore, an EIR is not required for the project.

RESPONSE 7-4

The commenter provides background information about the Citizens for Responsible Industry coalition and their statement of interest. The comment does not pertain to the project or specifically address the adequacy of the Draft IS/MND. Accordingly, no response is warranted.

RESPONSE 7-5

The commenter asserts that the County failed to comply with CEQA's requirement to provide access to all documents referenced in the MND during the public review period, thus invalidating the entire CEQA process and requiring an additional public review and comment period. As stated on page IS-1 of the IS/MND, the MND was prepared and published pursuant to Title 14, Division 6, Chapter 3, Article 6, Sections 15070 and 15071 of the California Code of Regulations (CCR) and pursuant to the Procedures for Preparation and Processing of Environmental Documents adopted by the County of Sacramento pursuant to Sacramento County Ordinance No. SCC-116. As stated by the commenter, even though the County did not have all referenced materials immedicably readily available for the commenter to access, it provided the disclosable referenced materials and extended the comment period an additional 15 days to allow the commenter to review the documents. The commenter takes quotes from CEQA and the CEQA Guidelines out of context. Section 15072(g)(4) of the CEQA Guidelines states in full text that a notice of intent to adopt a negative declaration or mitigated negative declaration shall specify, "The address or addresses where copies of the proposed negative declaration or mitigated negative declaration including the revisions developed under Section

15070(b) and all documents incorporated by reference in the proposed negative declaration or mitigated negative declaration are available for review. This location or locations shall be readily accessible to the public during the lead agency‘s normal working hours.” The California Natural Resources Agency revised this section of the CEQA Guidelines in 2018 to clarify that only those documents “incorporated by reference” must be made available for review. See the California Natural Resources Agency’s “Final Statement of Reasons for Regulatory Action, Amendments to the State CEQA Guidelines, OAL Notice File No. Z-2018-0116-12,” November 2018 (https://resources.ca.gov/CNRALegacyFiles/ceqa/docs/2018_CEQA_Final_Statement_of%20Reasons_111218.pdf). The project’s IS/MND did not in fact incorporate by reference any documents or materials. Thus, the County is in compliance with CEQA Section 21092 and Sections 15070 through 15073 of the CCR and the County has exceeded CEQA requirements by providing cited reference materials to the commenter.

RESPONSE 7-6

The commenter asserts that the County must prepare an EIR to comply with CEQA based on the commenter’s evaluation that the project may cause significant impacts. As shown in the *Errata to the Draft IS/MND* section, the County has added new project revisions in response to written comments on the project’s effects identified in the proposed MND; however, none of these revisions result in a new avoidable significant effect (14 CCR Section 15073.5(c)(2)) and merely clarify, amplify, or make insignificant modifications to the MND (14 CCR Section 15073.5(c)(4)). Therefore, recirculation of the MND or preparation of an EIR are not required as described in 14 CCR Section 15073.5(c) and 14 CCR Section 15073.5(d).

RESPONSE 7-7

The commenter alleges that NOx emissions from project construction are underestimated because the air quality modeling omits worker and hauling trips, and if all trips were included, the project would result in a significant impact. The commenter further recommends adding a Tier 4 fleet requirement for construction equipment or the implementation of SMAQMD’s enhanced exhaust control practices.

The air quality analysis did consider daily worker, vendor, and hauling trips for all phases of construction. This is provided in Section 3 for each CalEEMod run shown in Appendix A. Though the construction emissions evaluation for NOx did not exceed SMAQMD’s threshold, the County will implement Mitigation Measure AQ-1 to reduce construction generated fugitive dust and exhaust and the added Mitigation Measure AQ-2 to further reduce off-road equipment exhaust-related emission during construction, which requires off-road diesel-fueled equipment with engines larger than 50 horsepower to meet or exceed CARB Tier 4 Final emissions standards.

RESPONSE 7-8

The commenter alleges that the MND fails to disclose operational fugitive volatile organic compounds (VOC) and methane emissions or mitigate with a leak detection and repair (LDAR) mitigation program. Regarding fugitive emissions that would be released during RNG Plant operation, the RNG Plant is a is a closed loop system with emitting units consisting of the thermal oxidizer and off-specification gas flares. The facility would not have fugitive emissions that are considered from the standpoint of the air operating permit with SMAQMD. Fugitive emissions of GHGs are not counted under the Clean Air Act (CAA) for GHG sources.

Additionally, the RNG Plant operations would have its own internal program of leak detection

and mitigation consisting of performing leak checks on the facility equipment at least weekly and documenting any leaks found and how they were repaired. It is a goal of Kiefer Landfill Generating III, LLC, from both a safety and environmental perspective, to assess its facilities (in some cases using infrared cameras) to identify potential fugitive leaks. Should the SMAQMD Title V Air Operating Permit have leak detection requirements as a permit condition, these conditions would be followed.

Further, compressor stations are subject to federal, state and local air district rules and regulations. In general, for a compressor station, the California Oil and Gas Regulation is the more stringent of rules. It requires a leak detection and repair program, leak standards, and stringent reporting requirements.

RESPONSE 7-9

The commenter alleges that the County failed to analyze the health risk impacts from exposure to the project's air emissions and did not quantify sensitive receptors' exposure to toxic air contaminants (TACs) as recommended by the Office of Environmental Health Hazard Assessments (OEHHA) Risk Assessment Guidelines (February 2015). The commenter is referred to Page IS-36 of the IS/MND for a discussion of health risks associated with short-term construction activities. Construction related diesel particulate matter (DPM) emissions would be intermittent, temporary, and episodic, and exhaust would dissipate rapidly, limiting the concentration and duration of exposure at nearby sensitive receptors. In addition, construction activities would be transient across the project site (i.e., move from location to location), rather than occurring in a fixed location for extended periods, which would further limit potential exposure. Construction of the proposed RNG Plant would be located within the interior of Kiefer Landfill on previously disturbed land, and no sensitive receptors are located within approximately one mile of the site. Given the temporary and intermittent nature of construction activities associated with the pipeline, regulatory controls on diesel equipment and trucks, and the dispersive characteristics of diesel exhaust, construction related TAC emissions would not expose nearby sensitive receptors to substantial DPM concentrations. Additionally, the project would reduce construction emissions through Mitigation Measures AQ-1 and AQ-2, and impacts would be less than significant.

RESPONSE 7-10

The commenter alleges that an EIR is required because there is substantial evidence supporting a fair argument that the project may have significant hazards impacts. The commenter first notes that a discussion of risk scenarios relative to high risk areas with the pipeline and compressor station have been omitted. The comment assumes a pipeline operating pressure of approximately 400 pounds per square inch gauge (psig). However, this assumption is not representative of the proposed project. The project pipeline is proposed to operate at approximately 44 to 50 psig, which is consistent with a low to medium pressure natural gas distribution pipeline rather than a high-pressure transmission pipeline. Consequently, the example impact radius cited in the comment, which is based on a 400-psig pipeline, is not applicable to the proposed project. In addition, the cited "potential impact radius" is a conservative Pipeline and Hazardous Materials Safety Administration (PHMSA) planning metric used for integrity management purposes and should not be interpreted as an expected explosion or damage radius. The proposed pipeline would be designed, constructed, tested, operated, and maintained in accordance with applicable federal PHMSA regulations, California Public Utilities Commission (CPUC) requirements, and applicable PG&E engineering and interconnection standards to ensure safe operation. Thus, impacts to hazards would be less

than significant.

RESPONSE 7-11

The commenter continues to assert that the MND fails to provide a facility-siting or hazard interaction analysis and does not consider Sunrise Elementary School for the alternate compressor location. This alternate, eastern compressor station site is no longer being considered by the applicant as part of the proposed project and has been removed from the proposed project description. The analysis contained in the MND remains for informational purposes and reflects greater impacts than would occur under the proposed project. Accordingly, the proposed project would be expected to result in fewer potential impacts related to hazards to the local community than those analyzed in the MND. Therefore, the issues raised regarding that site are no longer applicable. The commenter is referred to the *Errata to the Draft IS/MND*, which includes modifications to page IS-6 of the IS/MND.

RESPONSE 7-12

The commenter alleges that the MND fails to accurately describe the existing environmental setting related to noise, thus the project may have significant noise impacts and requires the preparation of an EIR. This comment further asserts that the existing ambient noise environment established in the MND is based on outdated roadway noise contour information and did not include ambient noise measurements; thus, does not adequately establish the existing ambient noise environment in the project vicinity. While the existing noise setting in the MND was based on information from the City's 2006 General Plan, the existing setting was used only to provide context and a general estimate of noise levels in the vicinity of the project site, which are primarily due to vehicle traffic on nearby roadways. The ambient noise level was not used as a threshold for the noise analysis (explained further below in Response 7-13), and is, therefore, appropriate for describing the environmental setting for the MND.

Additionally, using roadway noise contour information from 2006 would represent a conservative estimate of noise increases in the vicinity of the project site, as traffic volumes since then have continued to increase through the present day. Therefore, current-day noise levels near the project site are expected to be higher than those shown in the MND. However, by using older roadway contour information and establishing a lower noise environment in the MND, any noise generated by the project would result in a greater increase above the ambient and result in larger noise increases. A lower ambient noise environment is presented for informational purposes so that a more conservative picture of ambient noise levels is provided.

RESPONSE 7-13

The commenter alleges that the construction noise threshold violates CEQA because it fails to consider the magnitude of increases in noise over ambient levels and does not adequately disclose the severity of the project's noise impacts.

Regarding noise impacts, this comment argues that the construction noise levels must be compared to the ambient noise levels. However, the CEQA Appendix G checklist states that if the project would result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies, then there would be a significant impact. The CEQA case *King and Gardiner Farms, LLC v. County of Kern*, cited by the commenter, did not explicitly conclude that an increase over ambient noise level threshold must be used in a CEQA analysis. Rather, the court stated why the magnitude of an increase in

ambient noise levels need not be addressed if a threshold was not used. This was in response to the main contention in that court case that the County of Kern used a single 65 A-weighted decibels (dBA) threshold for both construction and operational noise analyses.

As discussed on page IS-101 of the Draft IS/MND, the Federal Transit Administration (FTA) noise level thresholds were used in the absence of any specific thresholds for construction noise. The comment letter argues that the 80 dBA significance threshold is not based on substantial evidence for disclosing the severity of noise impacts. However, this threshold, established by the FTA, is based upon disturbance from construction noise and is commonly used in CEQA noise analyses to determine construction noise impacts.

Although construction noise may exceed existing ambient levels at times, the construction noise increases over ambient noise levels are assessed based on the context, duration, and intensity of the impact. In this case, construction noise would be temporary and limited in duration; confined to daytime hours when higher ambient noise levels are typical and when construction noise would not disturb sleep; and managed through Mitigation Measure NOI-1 to handle noise complaints and implement noise-reducing best management practices.

In addition, the fixed noise limit used in the analysis to evaluate the project's construction noise is set at a reasonable level at which adverse community reaction to construction noise would occur, consistent with FTA methodology for a construction noise analysis. In summary, the magnitude of the increase over ambient has been discussed qualitatively through discussion of allowed hours, conditions, the temporary nature of construction, and through the use of a fixed noise limit that accounts for adverse construction noise impacts to a community.

RESPONSE 7-14

The commenter alleges that the noise analysis underestimates the project's construction noise impacts and Mitigation Measure NOI-1 does not fully mitigate those noise increases. The commenter asserts that construction noise is calculated incorrectly due to deviating from FTA guidelines, and that actual construction noise levels would be higher. The assertions in the Wilson Ihrig letter about usage factors are a misinterpretation of the FTA guidelines. The letter asserts that the general FTA assessment guidance "necessitates" a usage factor of 100 percent, and therefore, the MND construction noise analysis that used the FTA assessment guidance of calculating construction noise impacts from the center point of the site is incorrect. The general FTA guidance is presented in such a manner to simplify construction noise calculations for users of the guidance. The guidance is not stating that the use of more accurate usage factors in the general guidance is not allowed or that the center point precludes the use of more accurate usage factors.

This is shown further in the detailed FTA assessment guidance. The Wilson Ihrig letter asserts this guidance "dictates" that distances should be calculated using the "closest distance between receptors and construction equipment for all equipment." However, the detailed guidance does not preclude using the center point; rather, if the center point is a justified position to use as the separation distance, it would fit within the wording of the guidance. Construction equipment moves across a project site throughout the day, and over a typical construction day, it is reasonable to assume that the center point represents the average sound level for that day. Furthermore, the FTA's 80 dBA construction noise threshold is based on an average noise level over an eight-hour period (i.e., typical construction workday), further supporting use of the average distance between equipment and nearby receptors as the basis for the calculations. Therefore, the FTA guidance was used correctly by the MND. The commenter's assertion that construction noise levels would be higher by using different assumptions is not valid, as their

assertion that the MND's construction noise levels are not valid is incorrect.

Furthermore, Ms. Toncheva's construction noise calculations that were included as Exhibit B in the comment letter, were done assuming that the entire equipment fleet, consisting of 13 pieces of equipment, would be operating simultaneously at a single location; however, this assumption is overly conservative and does not represent a realistic construction scenario, as equipment and work area dimensions would limit the amount of equipment present in a single location. The analysis presented in the MND, based on the two loudest pieces of equipment operating at a single location simultaneously, represents a reasonable scenario that would occur during the construction period.

Regarding the effectiveness of Mitigation Measure NOI-1, the Noise Study prepared as the basis for the MND includes general estimated construction noise levels when accounting for Mitigation Measure NOI-1, which requires a 15-foot-tall noise barrier installed between the construction boundary and nearby residences, as well as other noise-reducing construction best management practices. Based on the orientation and location of the work areas relative to the nearest sensitive receptors, a 15-foot-tall barrier installed along the construction boundary would be situated approximately 40 feet from the nearest receptor and 40 feet from the center of the pipeline footprint, which is assumed to be the average location where equipment would operate for extended periods of time. Using the barrier calculation methodology described in the Design Guidelines for Highway Noise Barriers,[4] which accounts for distance between the noise source and barrier, distance between the barrier and nearest receptor, and barrier height, it is estimated that the 15-foot-tall barrier would provide approximately 15 dBA of noise reduction to the nearest residences. As shown in the MND, construction noise levels would reach 93 dBA during the loudest phase. Implementation of Mitigation Measure NOI-1 would reduce construction noise levels to 78 dBA and below, which would not exceed the FTA's significance threshold of 80 dBA for construction noise; therefore, construction noise impacts would be reduced to a less-than-significant level.

RESPONSE 7-15

The commenter alleges that the absolute noise level and the potential increase in noise over ambient conditions were not properly evaluated. This comment references a noise threshold established in the Glenn County Noise Ordinance; however, the project site is located in Sacramento County, therefore, this threshold is irrelevant.

As explained above in Response 7-13, a quantitative fixed construction noise threshold was used to determine the project's construction noise impacts (which is an appropriate approach consistent with CEQA Guidelines). Rather than using a quantitative threshold based on an increase over the ambient noise environment, the impact of the project's construction noise in comparison to ambient noise environment was evaluated qualitatively.

This comment also alleges "…the MND does not provide estimates of the Project's expected noise levels." However, the commenter is referred to Tables IS-14, IS-18, and IS-19 of the MND (pages IS-105, IS-110, and IS-111, respectively) which provide estimates of the project's construction and operational noise. Additionally, as discussed in Response 7-14, construction noise levels when accounting for implementation of Mitigation Measure NOI-1 (which includes a temporary 15-foot-tall noise barrier) are estimated to be 78 dBA Leq and below, which would not exceed the applicable significance threshold of 80 dBA Leq. Construction noise impacts would,

[4] Klingner, Richard E., et al. 2003. Design Guide for Highway Noise Barriers. November.

therefore, be reduced to less-than-significant levels.

RESPONSE 7-16

The commenter provides concluding remarks that allege that the Draft IS/MND is legally deficient and asks that an EIR instead be prepared and circulated for public review. Based on Response Nos. 7-6 through 7-15, the commenter does not identify information that meets any of the criteria for preparation of an EIR. The comment is acknowledged for the record and will be forwarded to the decision-makers for their review and consideration.

RESPONSE 7-17

The commenter attaches Exhibits A through E in support of the letter provided:

- **Exhibit A** – Technical Review of the IS/MND Declaration for the Kiefer Landfill Gas Utilization Project, Control No. PLER2024-00137, County of Sacramento, California. Clark & Associates. July 23, 2026.
- **Exhibit B** – Review and Comment on Noise Study Kiefer Landfill Gas Utilization Project MND RWDI Reference No. 2601901_01. Wilson Ihrig/RWDI. July 23, 2026.
- **Exhibit C** – Letter to the County of Sacramento from Adams Broadwell Joseph & Cardozo, dated July 9, July
- **Exhibit D** – Notice of Intent to Adopt a Mitigated Negative Declaration for the Kiefer Landfill Gas Utilization Project
- **Exhibit E** – Email Communication from Sacramento County Public Records regarding Document Released to Requester (Request #26-4446), dated July 20, 2026.

The comment letter with appendices in full are included as an appendix to this Errata and Responses to Comments. Responses are directed to comments on the Draft IS/MND and not to the attachments. There are no environmental issues raised in the attachments that are not otherwise discussed in the main comment letter. Therefore, the exhibits are acknowledged for the record and will be forwarded to the decision-makers for their review and consideration.

APPENDIX

CONTAINING

COMMENT LETTER NO. 7:

ADAMS BROADWELL JOSEPH & CARDOZO

ON BEHALF OF

CITIZENS FOR RESPONSIBLE INDUSTRY

MITIGATION MONITORING AND REPORTING PROGRAM RECORDING REQUESTED BY:
County of Sacramento
Department of Community Development
Planning and Environmental Review Division
827 7th Street, Sacramento CA

WHEN RECORDED MAIL TO:
COUNTY MAIL CODE: 01-225
No Fee – For the Benefit of County of Sacramento (Code 6103)

SPACE ABOVE THIS LINE RESERVED FOR RECORDER'S USE

COUNTY OF SACRAMENTO

PLANNING AND ENVIRONMENTAL REVIEW

MITIGATION MONITORING AND REPORTING PROGRAM

CONTROL NUMBER: PLER2024-00137

NAME: Kiefer Landfill Gas Utilization Project

LOCATION: Kiefer Landfill: 12701 Kiefer Boulevard, Sloughhouse, CA 95683, approximately 0.6 miles southeast of the intersection of Grant Line Road and Kiefer Boulevard

Pipeline Routes would be located within the public rights-of-way and/or private easements and run northwest from Kiefer Landfill along Kiefer Boulevard either to the intersection of Kiefer Boulevard/Rancho Cordova Parkway or to the intersection of Kiefer Boulevard/Sunrise Boulevard, then north along Sunrise Boulevard where it would terminate in the vicinity of the intersection of Sunrise Boulevard/Douglas Road. Either a compressor station would be constructed near the intersection of Douglas Road and Sunrise Boulevard to connect existing Pacific Gas & Electric (PG&E) distribution and transmission pipelines or a metering and regulating (M&R) station may be constructed in the vicinity of the PG&E interconnect on Douglas Boulevard depending on the pipeline route (APN 067-0030-079-0000 or 067-2370-018-0000).

ASSESSOR'S PARCEL NUMBER(S):

RNG Plant: 126-0090-020-0000 & 126-0090-021-0000

Pipeline: 126-0090-021-0000, 126-0090-020-0000, 067-0030-078-0000, 067-0030-079-0000, and 067-2370-018-0000

APPLICANT: Kiefer Landfill Generating, LLC

PROJECT DESCRIPTION: Kiefer Landfill Generating III, LLC is proposing to construct a renewable natural gas (RNG) plant at Kiefer Landfill and a pipeline connecting the plant to existing PG&E natural gas pipelines in Sacramento County. Currently, landfill gas at Kiefer Landfill is being collected and combusted at engine plants known as Kiefer Landfill Generating I (KLG-1) and Kiefer Landfill Generating II (KLG-2) located within two contiguous buildings to produce electricity supplied to the Sacramento Municipal Utility District (SMUD). KLG-1 includes three 3-megawatt (MW) engines and KLG-2 has two 3-MW engines which operate 24 hours a day, 365 days a year, except for planned and unplanned outages. Landfill gas that is collected during an outage, or landfill gas that is collected in excess of the capacity of the KLG-1 and KLG-2 engine plants is combusted in two existing enclosed landfill gas flares. Kiefer Landfill also includes street sweepers, a diesel engine standby emergency generator, and a gasoline dispensing facility, not affiliated with Kiefer Landfill Generating III, LLC, which would not change as a result of the proposed project.

TYPE OF ENVIRONMENTAL DOCUMENT: Initial Study / Mitigated Negative Declaration

PREPARED BY: County of Sacramento
Planning and Environmental Review
827 7th Street, Room 225
Sacramento, CA 95814

PHONE: (916) 874-6141

MITIGATION MONITORING AND REPORTING PROGRAM

APPROVING BODY:_____ **DATE:**_____

SECRETARY OR CLERK NAME PRINTED:_____

SIGNATURE:_____
SECRETARY/CLERK SIGNATURE

California All-Purpose Acknowledgment

Pursuant to SB 1050 (Chapter 197, Statutes of 2014), Civil Code section 1189 has been amended to provide that any certificate of acknowledgment taken within the State of California shall be in the following form:

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California)
)
County of _____)

On _____ before me, _____ , Notary Public, personally
(Insert name and title of officer)
appeared _____ who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

Witness my hand and official seal.

_____ (Seal)
(Signature)

DECLARATION OF AGREEMENT

This Mitigation Monitoring and Reporting Program applies to certain real property, a Legal Description of which is attached as Exhibit A. I (We) the undersigned agree that this Mitigation Monitoring and Reporting Program applies to the real property described in Exhibit A. I (We) the undersigned am (are) the legal owner(s) of that property, and agree to comply with the requirements of this Mitigation Monitoring and Reporting Program (Summary and Mitigation Measures attached).

IN WITNESS WHEREOF, this declaration is hereby executed by the undersigned named legal owner(s) of the subject property on this ____ day of _____, 20_____.

TITLE OF PROPERTY OWNER ON DEED: _____
(company, corporation, trust or organization name above, if applicable)

PERSON's SIGNATURE: _____
(Signature above)

PERSON WITH SIGNING AUTHORITY:_____ _____
(Print name above) (Person's title: CEO, MANAGER, OWNER)

California All-Purpose Acknowledgment

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State of California)
)
County of _____)

On _____ before me, _____ , Notary Public,
(Insert name and title of officer)
personally appeared _____ who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

Witness my hand and official seal.

_____ (Seal)
(Signature)

TABLE OF MEASURES

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PURPOSE AND PROCEDURES

Pursuant to Section 21081.6 of the Public Resources Code and Chapter 20.02 of the County of Sacramento Code, a Mitigation Monitoring and Reporting Program has been established for the project entitled Project Name (Control Number: PLER2024-00137).

PURPOSE

The purpose of this program is to assure diligent and good faith compliance with the Mitigation Measures which have been recommended in the environmental document, and adopted as part of the project or made conditions of project approval, in order to avoid or mitigate potentially significant effects on the environment.

NOTIFICATION AND COMPLIANCE

It shall be the responsibility of the project applicant/owner to provide written notification to the Environmental Coordinator, in a timely manner, of the completion of each Mitigation Measure as identified on the following pages. The Environmental Coordinator will verify that the project is in compliance with the adopted Mitigation Monitoring and Reporting Program (MMRP). Any non-compliance will be reported to the project applicant/owner, and it shall be the project applicant's/owner's responsibility to rectify the situation by bringing the project into compliance and re-notifying the Environmental Coordinator. Any indication that the project is proceeding without good-faith compliance could result in the imposition of administrative, civil and/or criminal penalties upon the project applicant/owner in accordance with Chapter 20.02 of the County of Sacramento Code.

PAYMENT

1. It shall be the responsibility of the project applicant to reimburse the County for all expenses incurred in the implementation of the Mitigation Monitoring and Reporting Program (MMRP), including any necessary enforcement actions. The applicant shall pay an initial deposit of **$8,200.00**, which includes administrative costs of **$1,167.00**. Over the course of the project, the Planning and Environmental Review will regularly conduct cost accountings and submit invoices to the applicant when the County monitoring costs exceed the initial deposit.

   Until the MMRP has been recorded and the administrative portion of the MMRP fee has been paid, no final parcel map or final subdivision map for the subject property shall be approved. Until the balance of the MMRP fee has been paid, no encroachment, civil plan, building plan, sewer connection, water connection or occupancy permit from County of Sacramento shall be accepted for review or be reviewed.

RECORDATION

In order to record the adopted Mitigation Monitoring and Reporting Program with the County Recorder as required by Section 20.02.050(b)(2) of the County of Sacramento Code, the project applicant/owner shall provide to the Planning and Environmental Review a Legal Description for the real property that is the subject of the project.

COMPLETION

Pursuant to Section 20.02.060 of the County of Sacramento Code, upon the determination of the Environmental Coordinator that compliance with the terms of the approved Mitigation Monitoring and Reporting Program has been achieved, and that there has been full payment of all fees for the project, the Environmental Coordinator shall record and issue a Program Completion Certificate for the project.

PROPERTY TRANSFER

The requirements of this adopted Program run with the real property that is the subject of the project, as described in Exhibit A. Successive owners, heirs and assigns of this real property are bound to comply with all of the requirements of the adopted Program.

Prior to any lease, sale, transfer or conveyance of any portion of the real property that is the subject of the project, the record owner(s) at the time of the application for the project, or his or her successor's in interest, shall provide a copy of the adopted Program to the prospective lessee, buyer, transferee, or one to whom the conveyance is made.

PENALTIES

Chapter 20.02 of the County of Sacramento Code permits civil remedies and criminal penalties to be imposed in the event of non-compliance with an adopted Mitigation Monitoring and Reporting Program. The civil remedies, which are found in Section 20.02.090 of the County of Sacramento Code, include injunctive relief, stop work orders, revocation of any special permit granted concurrently with the approval of a Program, and the abatement of any resulting nuisance. The criminal penalties, which are found in Section 20.02.080 of the County of Sacramento Code, include a fine not to exceed five hundred dollars or imprisonment in the County jail not to exceed six months, or both.

Plans that are inconsistent with the adopted Mitigation Measures will not be approved.

In the event of an ongoing, serious non-compliance issue, the Environmental Coordinator may call for a "stop work order" on the project.

STANDARD PROVISIONS

Page one of all Project Plans must include the following statement in a conspicuous location:

> "All Plans associated with this project are subject to the conditions of Mitigation Monitoring and Reporting Program PLER2024-00137. For any questions regarding compliance with the MMRP document, contact MMRP staff at (916) 874-6141."

All Project Plans and any revisions to those Plans shall be in full compliance with the adopted Mitigation Monitoring and Reporting Program (MMRP). The project applicant/owner shall submit one copy of all such Plans and any revisions to the Environmental Coordinator prior to final approval by the County of Sacramento Building Permits and Inspection Division (BPID) or Site Improvement and Permit Section (SIPS). If the Environmental Coordinator determines that the Plans are not in full compliance with the adopted MMRP, the Plans shall be returned to the project applicant/owner with a letter specifying the items of non-compliance, and instructing the applicant/owner to revise the Plans, and then resubmit one copy of the revised Plans to the Environmental Coordinator, for determination of compliance, prior to final approval by BPID or SIPS.

Additionally, the project applicant/owner shall notify the Environmental Coordinator no later than 48 hours prior to the start of construction and no later than 24 hours after its completion. The applicant/owner shall notify the Environmental Coordinator no later than 48 hours prior to any/all Final Inspection(s) by the County of Sacramento.

Implementation and Notification (Action by Project Applicant):

1. Comply fully with the above measure.

2. Include the above measure verbatim as a Construction Note and incorporate it into all Plans and Specifications for the project, and submit one copy to the Environmental Coordinator for review and approval prior to the start of any construction work (including clearing and grubbing).

Verification (Action by the Environmental Coordinator):

1. Review the Project Plans prior to the start of construction. Approve Project Plans that are determined to be in compliance with all required mitigation.

2. Monitor compliance during periodic site inspections of the construction work.

3. Participate in any Final Inspection(s) as necessary.

COUNTY OF SACRAMENTO
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Measure No.	Description	Deliverable	Timing	Responsible Party	Verification & Notes
AQ-1	**Reduce Construction-Generated Fugitive Dust and Exhaust**. Construction contractors must implement the measures listed below to reduce construction-generated fugitive dust. Control of fugitive dust is required per SMAQMD Rule 403 and enforced by SMAQMD staff. The list of required measures was informed by SMAQMD's basic construction emission control practices. • Water all exposed surfaces two times. Exposed surfaces include, but are not limited to soil piles, graded areas, unpaved parking areas, staging areas, and access roads. • Cover or maintain at least 2 feet of free board space on haul trucks transporting soil, sand, or other loose material on the site. Any haul trucks that would be traveling along freeways or major roadways should be covered. • Use wet power vacuum street sweepers to remove any visible track out mud or dirt onto adjacent public roads at least once a day. Use of dry power sweeping is prohibited. • Limit vehicle speeds on unpaved roads to 15 miles per hour. • All roadways, driveways, sidewalks, parking lots to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used. • Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes (California Code of Regulations [CCR], Title 13, Sections 2449[d][3] and 2485). Provide clear signage that posts this requirement for workers at the entrances to the site. • Provide current certificate(s) of compliance with CARB's In-Use Off-Road Diesel-Fueled Fleets Regulation (CCR, Title 13, Sections 2449 and 2449.1). • Maintain all construction equipment in proper working condition, according to manufacturer's specifications. The equipment must be checked by a certified mechanic and determined to be running in proper condition before it is operated.	Implementation of BMPs for Fugitive Dust and Exhaust	During Ground-Disturbing Activities	Contractor	
AQ-2	**Reduce Off-Road Equipment Exhaust-Related Emissions During Construction**. For construction activities within the project area, including the compressor station site and renewable natural gas pipeline, all construction contractor(s) shall ensure that off-road diesel-fueled equipment with engines larger than 50 horsepower shall meet or exceed CARB Tier 4 Final emissions standards. An exemption from these requirements may be granted by the County if the construction contractor(s) submits documents to the County demonstrating that equipment with the required tier is not reasonably available. Before an exemption may be considered by the County, construction contractor(s) shall be required to demonstrate that two construction fleet owners/operators in Sacramento County were contacted and that those owners/operators confirmed Tier 4 final equipment could not be located within Sacramento County.	Use of Tier 4 Final emissions standards, unless granted exemption from Sacramento County.	During Ground-Disturbing Activities	Project Applicant / Contractor	
BIO-1	**Project Coverage Under SSHCP**. The project proponent shall obtain coverage for the project under the SSHCP with a signed SSHCP authorization form. This shall include submittal of all required application materials per SSHCP Section 10.4.2 and payment of all applicable fees consistent with current SSHCP requirements to mitigate for impacts to species and habitat prior to construction. All applicable fees shall be paid prior to ground disturbing activities. If a grading permit is not required, fee payment agreement shall be fully executed prior to issuance of the project's building permit. As part of the SSHCP authorization, impacts to land cover types would be evaluated. Impacts to Vernal Pool Fairy Shrimp, Midvalley Fairy Shrimp, and Vernal Pool Tadpole Shrimp are covered under the mitigation for impacts to Vernal Pools. Implementation of the Project will be required to comply with all applicable AMMs from the SSHCP to avoid and/or minimize impacts on habitat and special-status species that have a moderate or high potential to be located on or near the project site, including Swainson's Hawk, Tricolored Blackbird, Burrowing Owl (with the exception of AMM WBO-5), Western Spadefoot Toad, and Western Pond Turtle.	South Sacramento Habitat Conservation Plan (SSHCP) Authorization	Prior to Ground-Disturbing Activities	Project Applicant	

Signature:_____

COUNTY OF SACRAMENTO
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MITIGATION MONITORING AND REPORTING PROGRAM

Measure No.	Description	Deliverable	Timing	Responsible Party	Verification & Notes
BIO-2	**Pre-Construction Rare Plants Survey**. Prior to ground disturbing activities, a pre-construction plant survey shall be performed during the appropriate blooming period for special status plant species that are not covered by the SSHCP with moderate to high potential of occurrence, Valley Brodiaea and Spicate Calycadenia, that may be impacted by construction activities. The surveys will be conducted in accordance with Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities, or the most current protocols, specifically with respect to the number and timing of surveys, use of reference populations, and evaluation of negative findings. Results of the survey(s) will be submitted to Sacramento County Planning and Environmental Review. If the survey results are negative, no further action, and avoidance and minimization measures, is needed. If the survey finds that any special-status plant species are present, the survey report will include the location and description of all work areas, the location and description of all occupied habitat for special-status plant species, and identification of locations where effective avoidance measures could be implemented. The appropriate avoidance / protective measures shall be determined in coordination with the Environmental Coordinator and CDFW.	Pre-construction rare special-status plant species survey. Survey summary report to be submitted to Sacramento County Planning and Environmental Review (PER). If applicable, coordination with Environmental Coordinator for appropriate AMMs.	Prior to Ground-Disturbing Activities	Project Applicant / Qualified Biologist	
BIO-3	**Crotch's Bumble Bee Avoidance**. Initial ground-disturbing work (e.g., grading, vegetation removal, staging) shall take place between August 15 and March 15, if feasible, to avoid impacts on nesting Crotch's bumble bees. Regardless of the feasibility of the above limited operating period, a qualified biologist familiar with bumble bees of California and experienced using survey methods for bumble bees shall conduct a Protocol Survey for Crotch's bumble bee before the start of any ground-disturbing activities. Surveys shall be performed when Crotch's bumble bee is most likely to be identified, typically from March 1 through October 31 (i.e., the colony active period) when floral resources and ideal weather conditions are present, and shall follow the methods in Survey Considerations for CESA Candidate Bumble Bee Species. Surveys shall be conducted during the colony active period closest to the start of planned construction activities. Survey results shall be submitted to the project applicant and Sacramento County no less than 7 days before construction begins. • Crotch's Bumble Bee Protocol Survey. If Project activities are proposed to occur during the active season for CBB, Project Proponent shall develop a Pre-Construction Survey Plan for CBB and submit it to Sacramento County for acceptance, developed in coordination with CDFW (see https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150&inline). A total of three surveys shall be conducted prior to any ground-disturbing project activities or vegetation removal that will take place during the active season for CBB (March 1 through October 31), or until all flowering vegetation is largely desiccated, to determine if any active nests are within the project area. Each survey shall be spaced two to four weeks apart, unless otherwise authorized in writing by Sacramento County in coordination with CDFW, with the last survey taking place within 72 hours prior to construction activity. A Qualified Biologist shall perform meandering transects through the planned construction footprint, plus a 50-foot buffer where accessible, between 9:00 am and 1:00 pm where feasible and at least one hour after sunrise and at least two hours before sunset, to visually survey the area for CBB activity. The duration of the survey will be the minimum amount of time necessary to adequately survey the area, typically at least one hour of surveying per three acres of potential habitat, excluding capture, chilling, photo, identification, and release time. For each sampling event, the Qualified Biologist shall survey suitable habitat using non-lethal photo voucher and netting methods, developed in coordination with CDFW (see https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150&inline). If a suspected or confirmed CBB is identified during any of these surveys, the Qualified Biologist shall notify Sacramento County within 48 hours. If only foraging CBB or CBB nests are observed, a no-disturbance buffer of at least 50 feet from plants CBB have been identified as foraging from shall be established and the project proponent shall consult with Sacramento County and CDFW to demonstrate compliance with CESA.	Pre-construction survey for Crotch's bumble bee. Submit survey results to Sacramento County PER no less than seven (7) days before construction initiation. If applicable, coordination with CDFW for appropriate AMMs.	Prior to Ground-Disturbing Activities between August 15 and March 15	Project Applicant / Qualified Biologist	
BIO-3	**Crotch's Bumble Bee Avoidance (Con't).** – If impacts on Crotch's bumble bee cannot be avoided, project applicant shall obtain an ITP from CDFW and shall implement all avoidance measures included in the ITP – If Crotch's bumble bee is added to the SSHCP as a covered species at a later date, any AMMs associated with this species shall supersede these measures. If Crotch's bumble bee is added to the SSHCP CDFW ITP at a later date, the project applicant shall obtain incidental take coverage for this species through participation in the SSHCP.	CDFW Incidental Take Permit (ITP), in coordination with PER, if applicable.	Prior to Ground-Disturbing Activities	Project Applicant / Qualified Biologist	

Signature:_____

COUNTY OF SACRAMENTO
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Measure No.	Description	Deliverable	Timing	Responsible Party	Verification & Notes
BIO-4	**Monarch Butterfly Avoidance**. The following measures will be required to protect monarch butterflies prior to ESA (and, if applicable, CESA) listing. In the event monarch butterfly is ESA- and/or CESA-listed at the time of project construction, monarch butterfly protection requirements will instead adhere to the protocol(s) adopted by the listing agency/agencies (CDFW and/or USFWS). • No more than two days prior to the initiation of vegetation trimming or removal for construction, the project proponent shall ensure that a qualified biologist approved by the County of Sacramento surveys all areas of potentially suitable habitat in the project area for monarch butterfly larval host plants. • If host plants are found, the biologist shall survey all host plants for monarch eggs, larvae, and pupae. If no eggs, larvae, or pupae are found, plants may be removed within two days. • If eggs, larvae, or pupae are present, host plants shall be protected in place until the biologist has determined that no more eggs, larvae, or pupae are present.	Pre-construction survey of potentially suitable habitat and suitable host plants. Installation and maintenance / monitoring of protection for eggs, larvae, or pupae, if applicable.	No more than two (2) days prior to initiation of vegetation removal / trimming	Project Applicant / Qualified Biologist	
BIO-5	**Burrowing Owl**. On October 10, 2024, the California Fish and Game Commission accepted a petition to list western burrowing owl under CESA and designated the species as a candidate species. Pursuant to CESA, take of candidate species is prohibited. While western burrowing owl is a covered species under the SSHCP, the plan's CDFW 2081 Incidental Take Permit (ITP) does not include take coverage for the species. Pursuant to the SSHCP, the potential listing of western burrowing owl under CESA would be considered a changed circumstance that will trigger review by the SSHCP Technical Advisory Committee and an eventual amendment that will likely result in a change to the SSHCP, and addition of western burrowing owl to the SSHCP CDFW 2081 ITP. In the interim period during which take coverage for western burrowing owl is not available through participation in the SSHCP, to avoid take of burrowing owl, the project applicant shall implement the following:	Western burrowing owl pre-construction surveys, take avoidance, and ITP (if applicable)	Prior to and During Construction	Project Applicant / Qualified Biologist	
BIO-5.1	**Burrowing Owl - Burrowing Owl Surveys.** Prior to beginning ground-disturbing project activities, a Qualified Biologist shall conduct at least four surveys using the methods described in most recent guidelines from CDFW's Staff Report on Burrowing Owl Mitigation, Appendix D (2012). Surveys shall be conducted during the breeding season (February 1 to August 31) and include no fewer than four survey visits: at least one site visit between February 15 and April 15 and a minimum of three survey visits, at least three weeks apart, between April 15 and July 15, with at least one visit after June 15. Surveys shall also be conducted during the non-breeding season (September 1 to January 31) before the start of construction activities to determine seasonal residency. Nonbreeding season surveys shall consist of at least four visits, spread evenly, throughout the nonbreeding season. The presence of BUOW individuals, burrow complexes, or their sign (e.g., molted feathers, cast pellets, prey remains, eggshell fragments, owl whitewash, nest burrow decoration materials, etc.) anywhere onsite or within a 1650-foot accessible radius around the project Area shall be recorded and mapped. The Qualified Biologist shall submit the results of the survey to Sacramento County prior to beginning project activities. If changes in BUOW presence are detected (e.g., BUOW have moved onsite or changed burrow use), the Qualified Biologist shall contact Sacramento County by phone or email within 24 hours of the observation to consult on appropriate measures to avoid impacts of the project to BUOW and the Qualified Biologist shall establish no-disturbance buffers. The Qualified Biologist could modify the nest buffer with written approval from Sacramento County in coordination with CDFW.	Pre-construction survey of suitable habitat within 1,650-foot buffer	Prior to Ground-Disturbing Activities, during breeding season (February 1 to August 31) and non-breeding season (September 1 to January 31)	Project Applicant / Qualified Biologist	

Signature:_____

Measure No.	Description	Deliverable	Timing	Responsible Party	Verification & Notes
BIO-5.2	**Burrowing Owl - Burrowing Owl Take Avoidance.** During the breeding season (February 1 to August 31), surveys shall document whether burrowing owl are nesting in or within 1,650 feet of the project area. During the non-breeding season (September 1 to January 31), surveys shall document whether burrowing owl are using habitat in or directly adjacent to any area to be disturbed. Survey results shall only be valid for the season (breeding or non-breeding) during which the survey was conducted. If a lapse in project-related work of fifteen (15) calendar days or longer occurs, another focused survey and consultation with the County and CDFW shall be required before project work can be reinitiated. If a burrowing owl or evidence of presence at or near a burrow entrance is found to occur within 1,650 feet of the project site, the following measures shall be implemented: • If burrowing owl are found during the non-breeding season (approximately September 1 to January 31), the qualified biologist shall establish a no-disturbance buffer zone around active burrows. The buffer zone shall be flagged or otherwise clearly marked. Measures such as visual screens may be used to further reduce the buffer with CDFW approval and provided a qualified biologist confirms that such measures do not cause agitated behavior. • If burrowing owl are found during the breeding season (approximately February 1 to August 31), the project applicant shall: – Avoid all nest sites that could be disturbed by project construction during the remainder of the breeding season or while the nest is occupied by adults or young (occupation includes individuals or family groups foraging on or near the site following fledging). – Establish a minimum 1,650-foot non-disturbance buffer zone around nests, unless otherwise approved by the County in writing, in consultation with CDFW. The buffer zone shall be flagged or otherwise clearly marked. Should construction activities cause the nesting bird to vocalize, make defensive flights at intruders, or otherwise display agitated behavior, then the exclusionary buffer will be increased such that activities are far enough from the nest so that the bird(s) no longer display this agitated behavior. Construction shall only occur within the 500-foot buffer zone during the breeding season if a qualified biologist monitors the nest and determines that the activities do not disturb nesting behavior, or the birds have not begun egg-laying and incubation, or that the juveniles from the occupied burrows have fledged and moved off site. Any modifications to this buffer shall be approved by the County, in consultation with CDFW prior to its implementation. The buffer reduction request shall include relevant information and/or propose new measures to justify the buffer reduction. The buffer area must be clearly marked to prevent project-related activities from occurring within the buffer zone.	Pre-construction survey within 1,650 feet of project area. New survey required if lapse in project-related work of 15 days or more. Establishment of appropriate buffer, as applicable, in coordination with CDFW and Environmental Coordinator.	Prior to Ground-Disturbing Activities, during breeding season (February 1 to August 31) and non-breeding season (September 1 to January 31)	Project Applicant / Qualified Biologist	
BIO-5.3	**Burrowing Owl - Eviction of Burrowing Owls**. If after all applicable avoidance and minimization measures are implemented and Project proponent needs to evict burrowing owl, an ITP shall be obtained for the activity and a burrowing owl eviction plan shall be developed by a qualified biologist for the County's review and approval, in consultation with CDFW. This plan, including its proposed mitigation, shall be consistent with the most recent available guidelines (e.g., 2012 Staff Report on Burrowing Owl Mitigation). Burrow eviction shall only be conducted during the non-breeding season for burrows located in the project footprint, and in limited instances within a buffer zone around the project site, as determined by the County in consultation with CDFW after all avoidance and minimization measures have been exhausted.	CDFW Incidental Take Permit (ITP), in coordination with PER, if applicable.	Prior to Ground-Disturbing Activities		

Signature:_____

COUNTY OF SACRAMENTO
PLANNING AND ENVIRONMENTAL REVIEW
MITIGATION MONITORING AND REPORTING PROGRAM

Measure No.	Description	Deliverable	Timing	Responsible Party	Verification & Notes
BIO-6	**Nesting Bird Protection**. Adequate measures shall be taken to avoid inadvertent take of migratory bird nests when in active use. This shall be accomplished by taking the following steps: • If construction is proposed during the nesting season (February 1 to September 15, inclusive), a survey for nesting birds shall be conducted by a qualified biologist within seven days prior to the onset of ground disturbing activities to identify any active nests (i.e., nests containing eggs and/or young) of migratory and/or non-raptor bird species. Surveys will be performed for the project site, vehicle and equipment staging areas, and suitable habitat within 500 feet for all migratory and/or non-raptor nesting birds of the project site to locate any active migratory bird nests. If project related work does not commence within seven days, or if there is a lapse in construction activities totaling seven days or more, additional surveys will be required. • If no active nests are identified during the survey period, or if development is initiated during the non-breeding season, construction may proceed with no restrictions. • If active nests are found, an adequate no-disturbance buffer shall be established around the nest location and construction activities shall be restricted within the buffer until a qualified biologist has confirmed that any young birds have fledged and are able to leave the construction area. Required setback distances for the no-disturbance buffer will be established by the qualified biologist and may vary depending on the species, line-of-sight between the nest, and the construction activity, and the birds' sensitivity to disturbance. As necessary, the no-disturbance zone will be fenced with temporary orange construction fencing, high visibility rope, or a similar visual barrier if construction is to be initiated on the remainder of the development site. The buffer shall be kept in place until after the breeding nesting season or until a qualified biologist confirms the young have fledges, are foraging independently, and the nest is no longer active for the season. • Any birds that begin nesting within the project site and survey buffers during construction activities will be assumed to be habituated to construction-related or similar noise and disturbance levels and no-disturbance zones shall not be established around active nests in these cases; however, should birds nesting within the project site and survey buffers during construction activities begin to show disturbance associated with construction activities, no-disturbance buffers shall be established as determined by the qualified wildlife biologist. • A report of findings will be prepared by the qualified biologist and submitted to the County for review and approval prior to initiation of construction within the no-disturbance zone during the nesting season. The report will either confirm absence of any active nests or will confirm that any young within a designated no-disturbance zone have fledged and construction can proceed.	Pre-construction survey(s) during nesting season (February 1 to September 15). Findings report submitted to Sacramento County PER. Establishment of appropriate buffer from active nests, if applicable.	Survey - Within seven (7) days of vegetation removal / ground-disturbing activities. Buffer - Prior to vegetation removal / ground-disturbing activities.	Project Applicant / Qualified Biologist	
BIO-7	**Raptor Nest Protection**. Adequate measures shall be taken to avoid inadvertent take of raptor nests when in active use. This shall be accomplished by taking the following steps. • If construction is proposed during the nesting season (February 1st to September 15th, inclusive), a survey for nesting raptors shall be conducted by a qualified biologist within seven (7) days prior to the onset of vegetation removal, building demolition, or construction, to identify any active nests (i.e., nests containing eggs and/or young) of raptor bird species. Surveys shall be performed for the project site, vehicle and equipment staging areas, and suitable habitat within one half mile of the project site that can be accessed by the project proponent to locate any active raptor (bird of prey) nests. If project related work does not commence within seven (7) days or if there is a laps in construction activities totaling seven (7) days or more, additional surveys will be required. • If no active nests are identified during the survey period, or if development is initiated during the non-breeding season construction may proceed with no restrictions. • If active raptor nests are found, an adequate no-disturbance buffer shall be established around the nest location and construction activities shall be restricted within the buffer until a qualified biologist has confirmed that any young birds have fledged and are able to leave the construction area. Required setback distances for the no-disturbance zone shall be established by the qualified biologist and may vary depending on species, line-of-sight between the nest, and the construction activity, and the birds' sensitivity to disturbance. As necessary, the no-disturbance zone shall be fenced with temporary orange construction fencing, high visibility rope, or a similar visual barrier if construction is to be initiated on the remainder of the development site. The buffer shall be kept in place until after the breeding nesting season or a qualified biologist confirms the young have fledged, are foraging independently, and the nest is no longer active for the season. • In the event that raptors begin nesting within the project site amid construction activities, an adequate no-disturbance buffer shall be established around the new nest location until a qualified biologist has confirmed that any young birds have fledged and are able to leave the construction area.	Pre-Construction survey(s) during nesting season (February 1 to September 15). Establishment of appropriate buffer from active nests, if applicable.	Survey - Within seven (7) days of vegetation removal / ground-disturbing activities. Buffer - Prior to vegetation removal / ground-disturbing activities.	Project Applicant / Qualified Biologist	

Signature:_____

Measure No.	Description	Deliverable	Timing	Responsible Party	Verification & Notes
BIO-7	**Raptor Nest Protection (Con't)**. • All identified active raptor nests that may be subject to project related impacts shall be regularly monitored by a qualified biologist for any changes in behavior related to construction disturbance. If the qualified biologist observes that nesting raptors are disturbed by project related construction activities, all work activities shall cease until the qualified biologist identifies a revised no-disturbance zone. • A report of findings shall be prepared by the qualified biologist and submitted to the County for review and approval prior to initiation of construction within the no-disturbance zone during the nesting season. The report shall either confirm absence of any active nests or shall confirm that any young within a designated no-disturbance zone and construction can proceed.	Findings Report submitted to Sacramento County PER	Prior to Ground-Disturbing Activities During Nesting Season (February 1 to September 15)	Project Applicant / Qualified Biologist	
BIO-8	**Western Spadefoot Avoidance**. The California Fish and Game Commission received a petition on September 24, 2025, to list the western spadefoot as a candidate species under CESA and designated the species as a candidate species. Pursuant to CESA, take of candidate species is prohibited. While western spadefoot is a covered species under the SSHCP, the plan's CDFW 2081 Incidental Take Permit (ITP) does not include take coverage for the species. Pursuant to the SSHCP, the potential listing of western spadefoot under CESA would be considered a changed circumstance that will trigger review by the SSHCP Technical Advisory Committee and an eventual amendment that will likely result in a change to the SSHCP, and addition of western spadefoot to the SSHCP CDFW 2081 ITP. In the interim period during which take coverage for western spadefoot is not available through participation in the SSHCP, to avoid take of western spadefoot, the project applicant shall implement the following: 1. Habitat Evaluation and Delineation. Prior to initiating Project activities, a Qualified Biologist shall conduct a winter larval survey within the project area footprint. If the evaluation concludes that larval forms of the Western Spadefoot are present within the project area footprint, Sacramento County shall be consulted in coordination with CDFW and USFWS. 2. The project applicant shall minimize, to the extent feasible, permanent or temporary, fixed, exterior lighting, including motion-triggered security lighting that casts light on western spadefoot habitat beyond the Project Area between sunset and sunrise. Nighttime construction lighting shall be shielded and oriented downward to minimize effects on any nearby western spadefoot habitat.	Conduct habitat evaluation and delineation. Implement avoidance and minimization measures, if present.	Prior to Ground-Disturbing Activities	Project Applicant / Contractor / Qualified Biologist	
CUL-1	**Unanticipated Discovery of Cultural Resources**. In the event of an inadvertent discovery of cultural resources (excluding human remains) during construction, all work must halt within a 100-foot radius of the discovery. A qualified professional archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for indigenous and historic archaeology shall be retained at the Contractor's expense to evaluate the significance of the find. If an unanticipated discovery is determined to be a tribal cultural resource (TCR), the contractor shall defer to the standards and protocols to the consulting tribe. 1. Work cannot continue within the 100-foot radius of the discovery site until the archaeologist and/or tribal monitor conducts sufficient research and data collection to decide that the resource is either 1) not cultural in origin; or 2) not potentially eligible for listing on the National Register of Historic Places (NRHP) or California Register of Historical Resources (CRHR). 2. If a potentially eligible resource is encountered, then the archaeologist and/or tribal monitor, Planning and Environmental Review staff, and contractor shall arrange for the following: 1) total avoidance of the resource, if possible; 2) assessed for eligibility for listing in the NRHP/CRHR 3) test excavations or total data recovery as mitigation. The determination shall be formally documented in writing and submitted to the County Environmental Coordinator as verification that the provisions of CEQA for managing unanticipated discoveries have been met.	Retain qualified professional archaeologist, in event of discovery. Determination documented in writing and submitted to Sacramento County Environmental Coordinator.	During Ground-Disturbing Activities	Contractor / Qualified Archaeologist	
CUL-2	**Unanticipated Discovery of Human Remains**. Pursuant to Sections 5097.97 and 5097.98 of the State Public Resources Code, and Section 7050.5 of the State Health and Safety Code, if a human bone or bone of unknown origin is found during construction, all work is to stop, and the County Coroner, and Wilton Rancheria shall be immediately notified. If the remains are determined to be Native American, the coroner shall notify the Native American Heritage Commission within 24 hours, and the Native American Heritage Commission shall identify the person or persons it believes to be the most likely descendent from the deceased Native American. The most likely descendent may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposition of, with appropriate dignity, the human remains and any associated grave goods. Work may not proceed until the County has provided a reasonable path for work to resume.		During Ground-Disturbing Activities	Contractor	

Signature:_____

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Measure No.	Description	Deliverable	Timing	Responsible Party	Verification & Notes
GEO-1	**Inadvertent Discovery of Paleontological Resources**. If paleontological resources are discovered during earthmoving activities, immediately cease work in the vicinity of the find and notify the Sacramento County Department of Planning and Environmental Review. Retain a qualified paleontologist to evaluate the resource and prepare a recovery plan based on Society of Vertebrate Paleontology Guidelines. The recovery plan may include, but is not limited to, a field survey, construction monitoring, sampling and date recovery procedures, museum curation for any specimen recovered, and a report of findings. Recommendations in the recovery plan that are determined by the County to be necessary and feasible will be implemented before construction activities can resume at the site where the paleontological resources were discovered.	Notification of Sacramento County PER and retain qualified paleontologist, in event of discovery. Develop Recovery Plan	Prior to and During Ground-Disturbing Activities	Contractor / Qualified Paleontologist	
NOI-1	**Construction Noise Management Plan For Pipeline Alignment Option 2B**. Prior to the start of construction activities associated with pipeline alignment Option 2B, a Construction Noise Management Plan shall be created that includes the following: • Prior to the initiation of construction activities occurring within 100 feet of residences within the Tricon Sunridge residential community along Fiorenza Lane and Andria Lane, the contractor shall install temporary sound barriers and/or blankets and also maintain the sound barriers and/or blankets during such construction activities. Temporary sound barriers and/or blankets shall meet the following specifications: – The temporary sound barriers and/or blankets shall be installed in between the residences along Fiorenza Lane and Andria Lane and the construction area. – The temporary barriers/blankets shall be a minimum of 15 feet in height to block the line of sight between the construction area and the sensitive receptors along this section of the project alignment. Temporary blankets shall be of sufficient height to extend from the top of the temporary construction fence and drape on the ground or be sealed at the ground. – Barriers shall be constructed with a solid material that has a density of at least 1 pound per square foot with no gaps from the ground to the top of the barrier. The barriers shall have an STC rating of 32 or higher. • At least 10 days prior to the start of construction activities occurring near residences within the Tricon Sunridge residential community, a sign shall be posted at the construction site, or other conspicuous location, that includes a telephone number for project information, and a procedure in which a construction manager will respond to and investigate noise complaints and take corrective action, if necessary, in a timely manner. • At least 21 days prior to the start of construction activities, residences within the Tricon Sunridge residential community shall be notified of the planned construction activities. The notification shall include a brief description of the project, the activities that would occur, the hours when construction would occur, and the construction period's overall duration. The notification shall include the telephone numbers of the City's and contractor's authorized representatives that are assigned to respond in the event of a noise complaint. • If a construction noise complaint is registered and if a member of the City's Code Enforcement team is not available to make noise measurements, the Applicant, if and as directed by the City, shall retain a City-approved noise consultant to conduct noise measurements at the properties that registered the complaint. The noise measurements shall be conducted for a minimum of one hour. The consultant shall prepare a letter report for code enforcement summarizing the measurements, calculation data used in determining impacts, and potential measures to reduce noise levels to the maximum extent feasible.	Development of Construction Noise Management Plan	Prior to Ground-Disturbing Activities	Contractor	
NOI-1	**Construction Noise Management Plan For Pipeline Alignment Option 2B (Con't)**. • Prior to the start of and for the duration of construction, the contractor shall properly maintain and tune all construction equipment in accordance with the manufacturer's recommendations to minimize noise emissions. • Prior to use of any construction equipment, the contractor shall fit all equipment with properly operating mufflers, air intake silencers, and engine shrouds no less effective than as originally equipped by the manufacturer. • Material hauling and deliveries shall be coordinated by the construction contractor to reduce the potential of trucks waiting to unload for protracted periods of time. • To the extent feasible, hydraulic equipment shall be used instead of pneumatic impact tools, and electric-powered equipment shall be used instead of diesel-powered equipment. • Stationary noise sources (e.g., generators) shall be located as far from sensitive receptors as practicable, and they shall be muffled and enclosed within temporary sheds, or insulation barriers with a minimum STC rating of 32. • The use of bells, whistles, alarms, and horns shall be restricted to safety warning purposes only, • Signs shall be posted at the job site entrance(s), within the on-site construction zones, and along queueing lanes (if any) to reinforce the prohibition of unnecessary engine idling. All other equipment shall be turned off if not in use for more than five minutes. The construction manager shall be responsible for enforcing this.	Development of Construction Noise Management Plan	Prior to Ground-Disturbing Activities	Contractor	

Signature:_____

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Measure No.	Description	Deliverable	Timing	Responsible Party	Verification & Notes
TCR-1	**Compensated Construction Monitoring by Official Tribal Monitor**. The project applicant is required to retain an official tribal monitor from the Wilton Rancheria to observe all ground disturbance activities to occur during the construction phase in accordance with the approved treatment plan:	Tribal monitoring	Prior to Ground-Disturbing Activities	Project Applicant	
TCR-1.1	**Compensated Construction Monitoring by Official Tribal Monitor - Communication Protocols for Monitoring**. The applicant shall develop a set of communication protocols, to the satisfaction of the County and consulting tribe to identify all points of contact and to ensure that Wilton Rancheria is notified when the applicant will proceed with authorized construction activities. Points of contact will be established for the applicant, construction supervisor, monitoring tribes, and County Archaeologist, and the contact numbers and email addresses must be documented and shared among all parties. These shall be included in the Tribal Monitoring and Discovery Treatment Plan. Points of contact are responsible for identifying backup representatives in the event they are unable to perform due to an absence or other reasons.	Development of Communication Protocols, to be approved by Sacramento County PER.	Prior to Ground-Disturbing Activities	Project Applicant	
TCR-1.2	**Compensated Construction Monitoring by Official Tribal Monitor - Tribal Monitoring**. All construction-related ground-disturbing activities shall be monitored by a qualified tribal representative from Wilton Rancheria on this project to ensure that the procedures outlined in the Tribal Monitoring and Discovery Treatment Plan are addressed expeditiously and in accordance with the plan. The requirements for a monitor should be inclusive of all day and night construction activity that has the potential to result in ground disturbance. "Ground-disturbing activity" is defined herein as any activities that have the potential to disturb soil beyond that which was reasonably visible to tribal representatives and archaeologists during the pre-project pedestrian survey. This includes grading; trenching; excavation for below-ground utility installation or foundation work; and any other below-the-ground activities. Monitoring is not required for backfilling of previously excavated areas, placement of equipment into excavated areas, reseeding, or revegetation, re-grading or contouring of soil that was previously monitored, or for any aboveground project activity or construction that does not include ground disturbance, but monitors are allowed to observe upon request.	Tribal monitoring	During Ground-Disturbing Activities	Project Applicant / Contractor	

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EXHIBIT A: LEGAL DESCRIPTION