

Salisbury RNG Project – Motion to Amend CPG
Assessment of Proposed Modifications Under Section 248 Criteria (Revised December 12, 2018)

Section 248 Criterion	Evidence	Layout/Location Changes (Ucciani aff. ¶¶ 58–61)	Equipment Changes (Ucciani aff. ¶¶ 62–65)	Changes to Project Inputs & Outputs (Ucciani aff. ¶¶ 66–69)
248(b)(1) – Orderly development	Ucciani aff. ¶ 71	n/a*	n/a*	n/a*
248(b)(2) – Need for the Project	Ucciani aff. ¶ 72	n/a*	n/a*	n/a*
248(b)(3) – System Stability and Reliability	Ucciani aff. ¶ 73	n/a*	n/a*	n/a*
248(b)(4) – Economic Benefit	Ucciani aff. ¶ 74	n/a*	n/a*	n/a*
248(b)(5)/(b)(8) – Environmental	See below	See below	See below	See below
<i>Natural Env't/Resources</i>	Ucciani aff. ¶ 75	No undue adverse effect.	No undue adverse effect.	No undue adverse effect.
<i>Public Health and Safety</i>	Ucciani aff. ¶¶ 76–78; Lee aff. ¶ 17; Exhs. SAD1-5, -12	n/a*	No undue adverse effect. Project will utilize CH Four Biogas, an experienced vendor offering significant support.	n/a*
<i>Greenhouse Gas Impacts</i>	Ucciani aff. ¶¶ 79–83; Exh. SAD1-5	n/a*	n/a*	No undue adverse effect. Project will still produce renewable natural gas at a greater volume, which may result in greater reductions in CO ₂ .
<i>Impacts to Primary Ag Soils</i>	Ucciani aff. ¶¶ 84–86; Exh. SAD1-8 at 9	No undue adverse effect. All compacted areas of PAS will be addressed per typical AAFM guidelines.	n/a*	n/a*
<i>Air Pollution</i>	Ucciani aff. ¶¶ 87–92; Lee aff., ¶ 14; Exhs. SAD1-5, -20	n/a*	n/a*	No undue adverse effect. Project will still produce renewable natural gas at a greater volume, which may result in greater reductions in emissions.
<i>Water Pollution</i>	Ucciani aff. ¶¶ 93–95; Lee aff. ¶¶ 10-13, 23-26; Exhs. SAD1-7 at 6, -8 at 3; -20, -22	No undue adverse effect. Project will apply for construction- and operation-phase stormwater permits.	n/a*	No undue adverse effect. Liquid digestate/nutrient cake will be applied in accordance with Farm's nutrient mgt. plan or exported from the farm to avoid water pollution from excess nutrient loading.
<i>Headwaters</i>	Ucciani aff. ¶ 96; Exh. SAD1-6	n/a*	n/a*	n/a*
<i>Waste Disposal</i>	Ucciani aff. ¶¶ 97–104; Lee aff. ¶¶ 16, 23-26; Exh. SAD1-8	n/a*	No undue adverse effect. Project will apply for construction- and operation-phase stormwater permits. Backup generator will include oil containment.	No undue adverse effect. Project will obtain solid waste certification, and be added to Town Solid Waste Implementation Plan.
<i>Water Supply/Conservation</i>	Ucciani aff. ¶¶ 105–108; Lee aff. ¶ 34; Exh. SAD1-8	n/a*	n/a*	n/a*
<i>Floodways</i>	Ucciani aff. ¶ 109; Exh. SAD1-6 at 3–4	n/a*	n/a*	n/a*
<i>Streams</i>	Ucciani aff. ¶ 110; Lee aff. ¶ 22 Exhs. SAD1-6 at 4–5, -20	n/a*	n/a*	n/a*
<i>Shorelines</i>	Ucciani aff. ¶¶ 111; Exh. SAD1-6 at 5	n/a*	n/a*	n/a*

* n/a – denotes no potential for significant impacts under the specified section 248 criteria.

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Wetlands	Ucciani aff. ¶¶ 112–117; Lee aff. ¶ 19-21 Exhs. SAD1-6 at 4–5, -20	No undue adverse effect. Any necessary VANR and/or USACOE wetland permits will be obtained for the grading, installation of stormwater infrastructure, and culvert replacement in a Class II wetland and wetland buffer.	n/a*	n/a*
Soil Erosion	Ucciani aff. ¶ 118; Lee aff. ¶ 24 Exhs. SAD1-8 at 4, SAD1-20	n/a*	n/a*	n/a*
Aesthetics (Visual)	Ucciani aff. ¶¶ 120–123; Exh. SAD1-9	No undue adverse effect. Final Project visibility will be very limited, comparable to As-Approved Project.	n/a*	n/a*
Aesthetics (Noise)	Ucciani aff. ¶¶ 124–129; Exh. SAD1-10	n/a*	No undue adverse effect. Final Project noise generation will be below guidelines and comparable to As-Approved Project.	n/a*
Historic Sites (off-site)	Ucciani aff. ¶ 130	n/a*	n/a*	n/a*
Archaeological Sites (on-site)	Ucciani aff. ¶¶ 131–135; Exhs. SAD1-11, -18	Project will conduct a Phase I archaeological survey, and otherwise conduct activities at the site consistent with the DHP Stipulation.	n/a*	n/a*
Rare & Irreplaceable Natural Areas	Ucciani aff. ¶ 136; Exh. SAD1-6 at 7–8	n/a*	n/a*	n/a*
Necessary Wildlife Habitat/Endangered Species	Ucciani aff. ¶¶ 137–140; Exh. SAD1-6 at 8–10	No undue adverse effect. No bat, deer, or grassland bird habitat on Final Project site.	n/a*	n/a*
Transportation Systems	Ucciani aff. ¶¶ 141–143; Lee aff. ¶¶ 35, 38; Exhs. SAD1-1(Rev.), -2(Rev.)	n/a*	n/a*	No undue adverse effect. Final Project will result in fewer feedstock deliveries than As-Approved Project.
Educational Services	Ucciani aff. ¶ 144	n/a*	n/a*	n/a*
Municipal Services	Ucciani aff. ¶¶ 145–147	n/a*	n/a*	n/a*
Development Affecting Public Investments	Ucciani aff. ¶ 148; Exhs. SAD1-1(Rev.), -2(Rev.)	n/a*	n/a*	No undue adverse effect. Final Project will result in fewer feedstock deliveries than As-Approved Project.
248(b)(6) – Least Cost Integrated Plan	Ucciani aff. ¶ 149	n/a*	n/a*	n/a*
248(b)(7) – DPS Energy Plan (§ 202)	Ucciani aff. ¶ 150	n/a*	n/a*	n/a*

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248(b)(8) – Outstanding Resource Waters	Ucciani aff. ¶¶ 151–152; Exh. SAD1-6 at 2	n/a*	n/a*	n/a*
248(b)(9) – Waste-to-Energy Facilities	Ucciani aff. ¶¶ 153–156	n/a*	n/a*	n/a*
248(b)(10) – Transmission Facilities	Ucciani aff. ¶¶ 157	n/a*	n/a*	n/a*