

PART 3 SUPPORTING INFORMATION

EVALUATION OF THE MAGNITUDE AND IMPORTANCE OF PROJECT IMPACTS

for

WMRE Renewable Natural Gas Facility

**Town of Macedon
Wayne County, New York**

March 2025

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A. PROJECT DESCRIPTION

The Proposed Project will construct an 8,000 SCFM (standard cubic feet per minute) Renewable Natural Gas (RNG) Facility adjacent to the High Acres Landfill & Recycling Center. The RNG Facility will process biogas collected from the landfill into pipeline-quality gas for injection into the nearby commercial gas transmission and distribution network. The RNG Facility is expected to recover and distribute roughly 2 million MMBtu per year of RNG. Through biogas' beneficial use and recovery, more than 100,000 tons of greenhouse gas emissions per year would be avoided or reduced. The RNG Facility will use a proven, reliable, and efficient technology platform, including a combination of membranes and Pressure Swing Adsorption (PSA) to purify the biogas. The Proposed Project is generally compatible with other adjacent properties.

B. COORDINATED REVIEW

The Town of Macedon Town Board declared their intent to act as the lead agency for the State Environmental Quality Review Act (SEQRA) process on May 9, 2024. Part 1 of the Full Environmental Assessment Form (FEAF) and a project location map were sent via U.S. Mail to the interested and involved agencies listed in Table 1 on June 5, 2024, to initiate a coordinated review of the proposed action.

Table 1 – Interested and Involved Agencies		
Involved Agencies	Interested Agencies	Other Entities Provided Copies of SEQRA Correspondence
NYS Dept. of Environmental Conservation	Town of Perinton	Barton & Loguidice, D.P.C. WMRE

A response was received from the NYS Department of Environmental Conservation (NYSDEC) on July 22, 2024. The NYSDEC had no objection to the Town of Macedon Town Board being established as SEQR lead agency for the environmental review of the action.

C. DETAILED INFORMATION IN RESPONSE TO PART 2 OF SEQRA FULL EAF

The following information provides a detailed discussion of the potential impacts identified in Part 2 of the FEAF that were listed as small or moderate to large, in support Part 3 of the FEAF. The answers in the “No or Small Impact” column on Part 2 of the FEAF are further clarified with an “NI” for no impact and “SI” for small impact. This document is organized according to the question numbers in Part 2, and the additional information provided herein summarizes the proposed actions that will be taken in order to minimize and/or mitigate each identified impact.

1. Impacts on Land

The Proposed Project will include development that will disturb more than 1 acre of land but less than 10 acres. The Proposed Project will be covered under the landfill's existing State Pollutant Discharge Elimination System (SPDES) General Permit for

Stormwater Discharges from Industrial Activity. Before commencing any earthwork, coverage under said permit will be obtained from the New York State Department of Environmental Conservation (NYSDEC). Modifications to the existing SWPPP will be completed by adding an appendix insert to account for the proposed project. In general, stormwater runoff from the project area will be handled by infiltration dry swales and the existing Stormwater Detention Pond #9, located outside the project limits to the north. This pond ultimately discharges to a stream channel traveling east beneath Wayneport Road. Maintenance of this permanent pond is included in High Acres Landfill's MSGP Stormwater Pollution Prevention Plan (SWPPP). Erosion and sediment controls are included in the SWPPP to address temporary construction activities. The final outfall locations will remain consistent, and no changes are required to the facility's MSGP NOI.

2. Impacts on Geological Features

No impacts to geological features were identified. The proposed action will not result in the modification or destruction of, or inhibit access to, any unique or unusual landforms on the site (e.g., cliffs, dunes, minerals, fossils, caves).

3. Impacts on Surface Water

No temporary or permanent disturbance of wetlands, or potential 100-foot buffer of a wetland, is proposed. The Proposed Project does not impact State Wetlands PR-1, PR-23, MA-12, or MA-15, nor does it impact any tributaries of Thomas Creek or White Brook. Stormwater runoff will be managed as noted above, and there is no encroachment, filling, or excavation anywhere near a wetland or stream; as such, no negative impacts are anticipated.

4. Impacts on Groundwater

The proposed action will not result in new or additional use of groundwater, or have the potential to introduce contaminants to groundwater. Environmental monitoring of groundwater on a quarterly basis occurs at the adjacent High Acres Landfill & Recycling Center.

5. Impacts on Flooding

A SWPPP will be developed and followed during construction to minimize stormwater runoff. The SWPPP will describe all temporary and permanent stormwater control measures that may be needed for the project. The WMRE will obtain a construction SPDES permit from the NYSDEC, and the SWPPP and all SPDES permit conditions will be followed during construction.

6. Impacts on Air

This type of processing facility requires receipt of an Air Facility Permit from the New York State Department of Environmental Conservation (NYSDEC). The Proposed Action

will significantly reduce criteria pollutants, greenhouse gases (GHG), and hazardous air pollutants (HAPs). Air dispersion modeling of the project emissions shows compliance with the national ambient air quality standards (NAAQS) and all short-term guideline concentration (SGC) limits, and annual guideline concentration (AGCs) limits set forth in DAR-1.

7. Impacts on Plants and Animals

There will be no removal or destruction of large quantities of vegetation or fauna; substantial interference with the movement of any resident or migratory fish or wildlife species; no impacts on a significant wildlife habitat area; no substantial adverse impacts on a threatened or endangered species of animal or plant, or the habitat of such a species; or other significant adverse impacts to the natural resources as a result of the Proposed Action.

Available mapping indicates that the proposed project site does not contain any significant natural communities or any threatened/endangered/rare species (including both plants and animals). Available mapping indicates that the proposed project site does not contain any significant natural communities or any threatened/endangered/rare species (including both plants and animals).

8. Impacts on Agricultural Resources

The Proposed Action will not create a substantial change in the use or intensity of use, of land including agricultural, open space or recreational resources or in its capacity to support existing uses

9. Impacts on Aesthetic Resources

Temporary visual impacts associated with the Proposed Action may occur. Construction activities may also be visible to people traveling along Wayneport Road. An earthen berm and a shroud around the flare have been proposed to minimize any visual impacts. The new features are not expected to result in significant visual changes that contrast existing conditions.

10. Impacts on Historic and Archeological Resources

The Proposed Action will not impair the character or quality of important historical, archeological, architectural, or aesthetic resources or of existing community or neighborhood character. The project information was submitted to the NYS Department of Parks, Recreation and Historic Preservation (OPRHP). It is the opinion of OPRHP that no properties, including archaeological and/or historic resources, listed in or eligible for the New York State and National Registers of Historic Places will be impacted by this project.

11. Impacts on Open Space and Recreation

No impacts to open space and recreation were identified. The project will not result in a loss of recreational opportunities or a reduction of an open space resource.

12. Impacts on Critical Environmental Areas

No impacts to Critical Environmental Areas were identified. There are no Critical Environmental Areas within or near the project area.

13. Impacts on Transportation

The NYSDEC has prepared a workbook to assist applicants in completing the EAF. In doing so, NYSDEC has identified certain thresholds for whether impacts could be considered significant. For traffic, the NYSDEC's workbook instructs that "a project generating fewer than 100 peak hour vehicle trips per hour will not result in any significant increases in traffic." Any projects that anticipate generating more than 100 peak-hour trips should be considered significant, and a Traffic Impact Study should be provided. It was concluded that traffic volumes associated with the RNG Facility will only be about 5% of the threshold NYSDEC has established in its SEQR EAF workbook as significant. This conclusion is based on knowledge of the operation of RNG facilities, the fact that the facility is not intended for public access, and that the traffic levels that typically occur at these facilities range from an increase of 3-5 peak hour trips per day from employees and miscellaneous deliveries. Given that the anticipated traffic volume generated from the Proposed Project is roughly 5% of the significant threshold, additional traffic studies or mitigation measures are not required.

14. Impacts on Energy

The Proposed Action will not create a major change in the use of either the quantity or type of energy. Conversely, the project will generate energy.

15. Impacts on Noise, Odor, and Light

A Noise Impact Assessment was performed to evaluate sound levels projected to be received at the site boundaries and the nearest residences during peak operations of the Proposed Project. The assessment, completed by Aurora Acoustical Consultants, concluded that the predicted received sound levels at the residential boundary of the RNG Facility and nearby residences produced by the indoor and outdoor equipment will not exceed the daytime and nighttime permissible sound level limit specified in the Town of Macedon code for residential receivers. Furthermore, it is concluded that potential sound level increases from RNG Facility sources combined with the existing ambient sound levels, compared to ambient sound levels alone, will not exceed the NYSDEC (DEP-00-1) specified limit to sound level increases. Regarding human reaction,

the ambient sound level increases are projected to have no appreciable effect on receptors or be potentially perceptible only to the most sensitive receptors.

Proposed site lighting will be building-mounted area lights, no higher than 40', which will be dark sky compliant and maintain zero light spillage beyond facility property lines.

This RNG Facility employs an internal process that produces little to no odors. The RNG Facility will treat the LFG and process it to remove carbon dioxide (CO₂), hydrogen sulfide (H₂S), oxygen (O₂), and nitrogen (N₂) into a separate tail gas stream, Any tail gas stream (including odor-causing gases) will be destroyed in a new thermal oxidizer (flare).

16. Impacts on Human Health

The Proposed Action will not create a hazard to human health.

17. Consistency with Community Plans

No impacts were identified. The proposed action is consistent with existing Community Plans.

18. Consistency with Community Character

No inconsistencies with community character were identified. The proposed action is consistent with the character of the surrounding community.