GREENHOUSE GAS EMISSIONS ANALYSIS

SHEFFIELD APARTMENTS TOWN OF MONTGOMERY, NEW YORK

APRIL 2024



A Woman-owned Business Enterprise

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EPPMTG01-O1 GHG

1.0 PROJECT BACKGROUND

The project site consists of 53.08 acres on the site of MILR, LLC property in the Town of Montgomery, New York. The site has frontage/access on Route 17K and occurs to the west of Route 208 and north of I-84.

2.0 PROPOSED PROJECT

2.1 General

The 53.08-acre MILR, LLC property ("the Site") is a previously vacant property located in the south-central area of the Town of Montgomery, Orange County, New York. Referred to as the Scotts Corners area, the Site is located on Route 17K in the portion of Montgomery, just west of Scotts Corners itself. The Site includes 5 tax parcels: Section 29, Block 1, Lots 5.1, 5.2, 5.3, 5.4 & 5.5 with three different zoning designations.

The Proposed Action includes development of the former, vacant (agricultural) Site with multifamily residential units () to the south and, to the north, some commercial and retail fronting on Route 17K. This includes ACOE and NYSDEC wetlands and the NYSDEC's 100-foot, regulated adjacent areas. The 11,2 total acres of wetlands on Site will remain in their natural condition as will some of the adjacent areas.

Three multifamily residential buildings, with two unit types, are proposed Sheffield Apartments, including one and two bedroom apartments. Residential units are proposed to be market rate, rental apartments. There will be 36, one-bedroom apartments at 954 sq. ft. each and 225 two-bedroom apartments at 1,100 sq. ft. each.

Commercial retail will be constructed along the Route 17K frontage and will total approximately 31,000 square feet as one main building.

2.2 Project Sustainability

Project sustainability measures and building design components are discussed below and relate to advancements in energy conservation via equipment and materials. The project does not currently include any on-site "clean" energy-generating technologies (e.g., wind, solar or geothermal). These technologies will be further considered when the project reaches the building design phase.

The project will endeavor to meet the International Energy Conservation Code (or equivalent as suited to the New York State Building Code and the Town's Code) for residential buildings in Climate Zone 5 as follows:

<u>Building Envelope</u>: The building thermal envelope for all buildings will meet the requirements of the International Energy Conservation Code (or equivalent as suited to the New York State

Building Code and the Town's Code) for residential buildings in Climate Zone 5. (Note: specific values for building envelope components are as follows:

• Windows/fenestration U-Factor: 0.35 or less.

• Glazed fenestration SHGC: 0.25 or less

• Attic/Roof R-Value: 49 or greater

• Wood frame wall R-Value: 20 (cavity insulation) or 13+5 (continuous insulation: i.e., R-13 cavity insulation + R-5 continuous insulation).

• Mass wall R-Value: 8/13

• Floor R-Value: 38

• Basement wall R-Value: 7.5

Slab R-Value & depth: 10 & 2 feetCrawl space wall R-Value: 10

All values can be substituted if building envelope passes a COMcheck.

<u>Building Mechanical, Electrical & Plumbing Systems</u>: Although detailed specifications of each of these systems has not been determined at this time, all systems will meet the requirements of the International Energy Conservation Code (or equivalent as suited to the New York State Building Code and the Town's Code). Examples of requirements are as follows:

- <u>Controls:</u> (1) thermostats shall be provided for each separate heating and cooling system (each apartment to have its own zone). Programmable thermostats are recommended.
- <u>Hot water boilers</u>: When supplying heat to each building through one or two-pipe heating systems, they shall have an outdoor setback control that lowers the boiler water temperature based on the outdoor temperature.
- <u>Ducts and air handlers</u>: Supply & return ducts with a size of 3" dia. or greater shall be insulated to a minimum of R-8, and those with a size of less than 3" dia. shall be insulated to a minimum of R-6. Ducts, air handlers and filter boxes shall be sealed.
- <u>Mechanical system piping insulation</u>: Mechanical system piping capable of carrying fluids above 105 degrees F or below 55 degrees F shall be insulated to a min. of R-3.
- <u>Heated Water Circulation & Temperature Maintenance Systems</u>: Heated water circulation systems shall be provided with a circulation pump. Controls shall start the pump based on demand, and shall automatically turn off the pump when the water reaches the desired temperature and when there is no longer demand for hot water.
- <u>Demand recirculation systems</u>: A water distribution system having one or more recirculation pumps that pump water from a heated water supply pipe back to the heated water source through a cold-water supply pipe. Pumps shall have controls that start on demand from a user/fixture or sense the flow of hot or tempered water to a fixture fitting or appliance.
- <u>Hot water pipe insulation</u>: Insulation for hot water pipe with a min. thermal resistance of R-3 shall apply to ³/₄" dia. or larger piping, piping serving more than (1) dwelling unit, piping located outside the conditioned space, piping from the water heater to a distribution manifold, piping located under a floor slab, or buried piping.
- <u>Mechanical ventilation</u>: The building shall be provided with ventilation that meets the requirements of the International Residential Code or the International Mechanical Code

- (or equivalent as suited to the New York State Building Code and the Town's Code). Outdoor air intakes and exhausts shall have automatic or gravity dampers that close when the ventilation system is not operating.
- <u>HVAC equipment sizing & efficiency rating</u>: Shall be sized in accordance with ACCA Manual S based on building loads. New or replaced HVAC equipment shall have an efficiency rating equal or greater than the minimum required by federal law for the geographic location where the equipment is installed. Systems serving multiple dwelling units shall comply with Sections C403 and C404 of the IECC (or equivalent as suited to the New York State Building Code and the Town's Code) Commercial Provisions in lieu of Section R403.
- <u>Lighting equipment</u>: Lamps in permanently installed lighting fixtures shall be highefficiency lamps (e.g., LEDs), with the exception of low-voltage lighting in certain locations.

Interior Finishes, Equipment:

• <u>Finishes</u>: Although the specific interior finishes have not been selected at this time, they will be designed to meet sustainability standards such as Greenguard Indoor Air Quality. Products with a high natural material content, as well as a high recycled content and a non-VOC content will be selected as available. In addition, every effort will be made to select products manufactured or assembled in the United States.

Construction Methods, Equipment:

The project will investigate and/or use several methods to reduce GHG emissions in building construction:

- Use AutoCAD (or equivalent) for estimating "Cut Sheets" in material design. This reduces wasted materials needing disposal.
- Abide by NY State idling laws which limit diesel engine idling to 5 minutes (NYS Environmental Conservation Law, 6 NYCRR, Subpart 217).
- Investigate the use of low-carbon cement for the foundations.
- Use newer (i.e., higher-efficiency/low-emission) equipment where possible.
- Ensure that all caps for petroleum storage and on equipment are fully tightened daily (this reduces evaporative loss of VOCs).

3.0 GREENHOUSE GAS MODELING

3.1 General

In the existing condition, the site is in a vacant, secondary growth condition. It does not currently contribute any significant, man-made greenhouse gasses or equivalents as a carbon footprint.

The Kyoto Protocol discusses emissions of the six main greenhouse gases, namely: • Carbon dioxide (CO₂); • Methane (CH₄); • Nitrous oxide (N₂O); • Hydrofluorocarbons (HFCs); • Perfluorocarbons (PFCs); and • Sulphur hexafluoride (SF₆).

Per the US EPA:

Carbon Dioxide (CO₂) is a naturally occurring gas and is a by-product of burning fossil fuels and other industrial processes. It is the principal man-made greenhouse gas that affects the Earth's radiative balance. It is the reference gas against which other greenhouse gases are measured. CO_2 will be produced on site as the dominant end product (i.e., full combustion) of home and office heating fuels. Indirectly, it will be produced as the project (i) consumes electricity and (ii) results in vehicular trips (non-ev).

Nitrous Oxide (N₂O) is a powerful greenhouse gas with a global warming potential of 310 times that of carbon dioxide (CO₂). Major sources of nitrous oxide include soil cultivation practices, especially the use of commercial and organic fertilizers and high temperature fossil fuel combustion. N_2O will not be produced directly by the project; indirectly, it will be produced as the project (i) consumes electricity (ii) results in some landscaping¹. No high temperature fossil fuel combustion (i.e., 2,000 to 3,000 degrees F) will occur on site.

Methane (CH4) is a hydrocarbon and a greenhouse gas with a global warming potential of 21. Methane is produced through anaerobic (without oxygen) decomposition of waste and incomplete fossil fuel combustion. Therefore, the proposed action would produce methane dominantly as a by-product of the proposed waste water treatment facility. The project will not be supplied with natural gas (i.e., methane) fuel.

Sulfur Hexafluoride (SF6) is a man-made chemical composed of sulfur and fluorine with a global warming potential of 22,800. It is a colorless gas soluble in alcohol and ether and only slightly soluble in water. Sulfur hexafluoride is a very powerful greenhouse gas used primarily in electrical transmission and distribution

6

 $^{^{1}}$ It should be notes that when the site was in a prior agricultural use, the $N_{2}O$ contribution to greenhouse gasses due to fertilizer use was undoubtedly much greater than the proposed action. The prior agricultural use also produced a considerable amount of CO_{2} due to planting/harvesting and other farm equipment.

systems. Therefore, the proposed action would "produce" (utilize) this compound only indirectly as a result of electrical consummation.

Perfluorocarbons (PFCs) are a group of man-made chemicals composed of carbon and fluorine only. PFCs are emitted as by-products of industrial processes and are also used in manufacturing. *The project will not significantly "produce" PFCs but it may be included in some, synthetic building products.*

Hydrofluorocarbons (HFCs) are compounds that contain only hydrogen, fluorine, and carbon atoms. They were introduced as alternatives to ozone depleting substances in serving many industrial, commercial, and personal needs. HFCs are emitted as by-products of industrial processes and are also used in manufacturing. The project will not significantly "produce" HFCs but it may be included in some, synthetic building products and some personal products (mostly as propellants).

The carbon footprint modeling begins with a measure of the total amount of carbon dioxide (CO₂), or in the case of vehicular emissions, CO₂ or CO₂ equivalents, which are emissions that are directly and indirectly caused by an activity or is accumulated over the life stages/operation of a product. The "operation" includes activities of individuals living in those residential units plus associated transportation. The CO₂ emissions or CO₂ equivalents may then be converted to/expressed as carbon content. Footprint calculations, usually in pounds or tons per year, follow from the CO₂ emission calculations. The above factors are accounted for in the USEPA's modeling. For example, CH4 is assumed as a by-product of treating household sanitary waste water and biosolid and the results are in CO₂ equivalents and direct and indirect vehicular trips are calculated.

3.2 U. S. Environmental Protection Agency Tools (Operational GHG)

The New York State Department of Environmental Conservation's, Guide for Assessing Energy Use and Greenhouse Gas Emissions in Environmental Impact Statements² was issued on September 9, 2008 (NYSDEC GHG). It states that it "will be applicable" to power plants and solid waste facilities and that other large-scale projects ("such as a very large-scale resort or residential" projects), "will also find this guide useful." In a further draft of March 11, 2009, "a very large scale project" was further refined to, "generate thousands of trips or use significant amounts of energy" could "possibly" have an EIS where the discussion of energy use or GHG emissions is "required." For this project and document, the applicant has requested a GHG

Assessing Energy Use and Greenhouse Gas missions in Environmental Impact Statements

States, "This policy should be used by DEC staff in their review of an EIS when:

• DEC is the SEQR lead agency in a project review and for project's with very large GHG emissions potential, such as "methane emissions from wastewater treatment plants; emissions of hydrofluorocarbons and perfluorocarbons from the manufacturing, servicing and disposal of refrigeration and air conditioning equipment; and other GHGs emitted through various chemical and manufacturing processes..." Further, The SEQR Handbook, 4th Edition Chapter 5: Environmental Impact Statements, Section 53 states that, "In contrast, the regulations exclude ordinary projects like large shopping malls, residential developments, or office complexes." Thus, this particular guidance does not apply to this project.

² NYSDEC's July 15, 2009

analysis. The above NYSDEC documents have been referred to and utilized in this effort as the useful guide they were intended to be.

The March 11, 2009 NYSDEC Greenhouse Gas Emission Guide states that, "accurate estimates of energy use and resulting GHG emissions will be complicated by the limitations of energy modeling tools," site and project-specific design features, and, "the **preliminary nature** [emphasis added] of a project design at the point when an EIS might be filed." Further, the March 11, 2009 Greenhouse Gas Emission Guide did not require any specific, overall methodology for calculating such virtual emissions. However, it does cite U.S. Environmental Protection Agency (EPA), U. S. Department of Energy and other sources which have been used in the current analysis. Specifically, it cites US EPA's Climate Leaders Inventory Guidance, US EPA's WARM program and the World Resources Institute and World Business Council for Sustainable Development (WRI/WBCSD) as providing "relevant information." These programs have been incorporated as methodologies, background data and calculations within the US EPA's carbon "tools."

The CO₂ "emission" modeling provided herein was based upon:

- 1. U.S. Environmental Protection Agency's (US EPA) most recent "Individual Household Calculation Tool" for the residential Proposed Action.
- 2. U.S. Environmental Protection Agency's (US EPA) most recent "Commercial Greenhouse Gas Emissions Tool" for the Proposed Action mixed uses on site.
- 3. World Resources Institute and World Business Council for Sustainable Development (WRI/WBCSD) inputs to the commercial use modeling tool.
- 4. U. S. Energy Information Administration, New York Energy Research and Development Authority and local utility data (as available).

The US EPA models are based upon detailed information which has been accumulated by the various Departments of the Federal government for several decades. These data include intensive information regarding energy consumption for a wide variety of human endeavors; they have been accumulated and compiled since the mid-1970s (as spurred on by the first energy crisis of 1973-1974). Data include home or commercial heating (oil, natural gas, etc.) in various regions of the country, the consumption of various goods, the transportation of both goods and people, etc. plus the energy required to accomplish these ends. These data were further augmented by information from the NY State Energy Research and Development Authority.

The modeling of virtual emissions³ in the form of carbon dioxide requires the translation of various forms of energy (e.g., natural gas, gasoline, diesel fuel, etc.) to useful energy or "work" units and the carbon oxidized from the fuel in the process. Industry-wide energy equivalent conversions from gallons, kilowatts or cubic feet (therms) of energy consumed were/are applied in the calculations. For example, one kilowatt hour (kw-hr) of electricity translates to 3,412 British

³ The CO₂ emission calculated in GHG efforts are largely "virtual" emissions. That is, with the exception of fossil fuel vehicles and non-electric home HVAC, the emissions are not produced directly by the user. For example, when a user "consumes" a staple item such as food, a bag of fertilizer or paper, they do not "emit" CO₂ at that location. Rather, the CO₂ emissions" occur in other places (where the consumer items are produced, transported and then the residual waste is disposed). Many, if not most, of these emissions are "virtual" since they do not- and will not- occur at the location of the proposed project.

Thermal Units (btu's), one horsepower (transportation) to 2,545 btu and one therm (natural gas) to 100,000 btu. Combustion was assumed to be 100 percent of the fuel at issue and carbon content was based on the type fuel "utilized". For example, one gallon of gasoline contains 18.9 kilograms (kg) of carbon per giga-joule (GJ equivalent to a little less than one million btus) and propane has 17.2 kg of carbon per GJ. <u>Carbon dioxide (CO₂)</u> emissions were/are determined in this analysis. The carbon equivalents can be derived from the data by using the appropriate molecular weights of carbon and oxygen.

Carbon dioxide (CO₂) and equivalent emissions were calculated as follows:

(A) Transportation: Pounds of carbon dioxide equivalent are calculated and based on US EPA's estimate of the greenhouse gas emissions (especially as CO₂) from a typical passenger vehicle. These data were based on average national fuel consumption for the vehicle types assumed to be used; the national sedan average is 26.5 miles per gallon (mpg).⁴ The GHG NYSDEC draft guidance of March 11, 2009 recommends calculating trip generations for the project and then estimating vehicle miles traveled using, "reasonable assumptions about distance traveled..." The Project's traffic GHG generation assumed 2 vehicles per residential unit and a number of different vehicles, including panel trucks, for the commercial space. These unrestricted units were assumed to generate largely "localized" traffic. Some commuting to and from work in the Newburgh, Middletown and Beacon area was assumed or to the nearest Coach Bus route or Metro North stations in Middletown or Beacon.

(B) Electricity: Electricity emissions factors are categorized by geographic sub-region. Electrical uses for the home modeling have been compiled by use, square footage, and occupancy based on US EPA and U.S. Department of Energy (USDOE) statistics and New York State's Energy Research and Development Authority. For residential buildings, Department of Energy's, Energy Information Administration, Office of Energy Statistics consumption data was used to calculate an CO₂ equivalent per year based on carbon dioxide output of 907.16 pounds per megawatt-hour of electricity for New York power plants⁵. The energy consumption data were then calculated by proposed residential units types that is, 1-2 bedroom units as based on the Project plan by Engineering & Surveying Properties.

(C) Natural Gas⁶: Typical CO₂ emissions are usually calculated per household and are based on unit type. The consumption levels were further refined based upon Department of Energy's, Energy Information Administration, Office of Energy Statistics data, New York State Electric and Gas (NYSEG) and New York State's Energy Research and Development Authority pricing/consumption data, etc. However, no natural gas will be used for this project. The above electrical consumption numbers have been effectively doubled to reflect this condition.

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⁴ As determined by Federal Highway Administration (FHWA), Bureau of Transportation Statistics, the average fuel consumption for passenger vehicles was 26.5 mpg. For projects with substantial future completion dates, CAFE standards which mandated a 40 percent fuel efficiency improvement by 2020 are included in MOVES. The current analysis is for the full build.

⁵ This translates a little higher than the NYSDEC Draft guidance which provides a figure of 0.850 pounds of CO₂ per kw-hr. of power plant production in New York State. Based upon USEPA's eGrid Version 2.1.

⁶ Fuel source was assumed to be electricity

(D) Waste Disposal: The residential calculations assume that households generated waste based upon 2.0 pounds per person per day in New York. Greenhouse gas emission benefits from recycling newspaper, glass, plastic, metal and magazines were developed using the US EPA data and all life-cycle greenhouse gas emissions factors for waste management. Carbon dioxide equivalent emissions associated with household waste management were based on material types. The emissions for each material type are based on the Waste Reduction Model (WARM)⁷. These emission factors take into account the full material life cycle: i.e., not only the emissions sequestered into landfills, but also the emissions and sequestration associated with production, manufacturing, remanufacturing, forest carbon storage due to reduced harvests.

In making the calculations about projected energy and resource use that are reflected in this report, the applicant has projected energy consumption based on transportation and residential unit types. The applicant has also gathered sufficient primary data in preparing the documentation to make reasonable calculations, of primary and secondary source CO₂ "emissions" data versus credible carbon measurement standards. As provided by NYSDEC GHG, however, any methodology is constrained by, "limitations of energy modeling tools," site-and project-specific design features, and, "the **preliminary nature** [emphasis added] of a project design at the point when an EIS might be filed." Within these limitations, these calculations represent reasonable estimates of carbon emissions and resource use for the project.

3.3 Building Construction GHG

For the GHG involved in the production and wooden building elements:

To allow for an equivalent comparison of each buildings type to the other, two construction materials, concrete and wood, were considered at present. Concrete was chosen because it has the largest, net carbon dioxide (CO₂) equivalent emissions (i.e., CO₂ equivalents for production minus CO₂ equivalents for sequestration) of all materials that could be used.

For example, concrete's CO₂ equivalent emissions are 0.51 tons per ton (which equates to approximately 1.03 tons per cubic yard). This CO₂ emission factor is approximately 230 times higher than a ton of wood⁸ (before even counting the lower "tonnage" of wood generally required for construction of the same structure).

In this case, the majority of building construction will be wood frame on concrete foundations. The slab and foundations were estimated to use 814 cubic yards for the site. As such, the foundations would "generate" some 814 tons of CO₂ equivalent emissions but NOT on-site. These would be created at the Portland Cement production facility. One such plant occurs in New Baltimore, NY.

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⁷ The NYSDEC GHG draft recommendations of March 11, 2009, Section D, recommends calculating waste generation and CO₂ data from this source and WARM is the basis for calculations used in the USEPA's Household estimating tool.

⁸ Per USEPA's 2009 Draft U.S. Greenhouse Gas Inventory and MIT 2019, Construction with Engineered Wood.

Each residential building would be some 3 stories tall and 39,759 square feet of footprint. The commercial buildings will add some 31,000 square feet of footprint. The wood framing include in each building is estimated at 92 tons per 1,000 square feet. At 0.002 tons of CO₂ equivalent emissions per ton of wood utilized, 14,670 tons of CO₂ equivalent emissions would "generated" but, to harvest, process, deliver and install the wood on-site. The fact that the building's framing and structural members will be dominantly constructed of wood actually creates a more environmentally "friendly" result because it results in carbon sequestration of some 0.8 tons per year per acre as it grows in the forest⁹. This result was not calculated herein.

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⁹ MIT 2018, Mass Timber Construction.

4.0 RESULTS

4.1 Greenhouse Gasses

Carbon dioxide (CO₂) emissions and footprint modeling results were calculated in several forms. First, the tools/models used produce results that are in pounds, kilograms or tons¹⁰. Tons can be English or metric units (see footnote 1). In Section 4.0 and its associated Table 1 at the end of the report text, the results are presented in English tons per year to make the results more understandable to the general public. The US EPA-based modeling from which these results are derived are presented in Appendices A and B. The results are reported as:

- Proposed Action Residential Attached Units, 1-2 Bedrooms
- Proposed Action Commercial (mixed use, non-industrial)
- 11.2 acres of wetlands and adjacent "buffer" areas (combined) are preserved acreage.

The Proposed Action has 261 attached residential units with no age restriction. The 1- and 2-bedroom units (36 and 225, respectively) would produce 4,014 tons per year of CO₂ or equivalent GHG emissions¹¹.

The potential, future commercial activity in the proposed mixed-use portions of the site will include some 31,000 square feet of space. Directly, this activity would produce approximately 107 tons of per year of CO₂ or equivalent GHG emissions. However, electricity used/purchased from outside sources (i.e., Orange and Rockland Utility in this case) would produce (off site) approximately 2,749 tons of per year of CO₂ or equivalent GHG emissions.

Since 11.2 acres of wetlands will be preserved on site, a sequestration credit of approximately 9 tons per year of CO₂ or equivalent GHG emissions was calculated for the Project.

It is important to note that the projected project population will occur regardless of the project's implementation. What this means is that the people which make up this population will occur most likely occur somewhere within the Hudson Valley and New York City metropolitan region as a result of "organic" demographic growth and they will create some type of carbon footprint as a result of their existence and in the course of living their lives; the only reasonable questions are — where will they occur and will that location foster a greater or smaller carbon load/footprint¹²?

Given the above results, it is likely that the proposed project could represent a net decline in CO₂ and GHG "equivalent" emissions. This will occur because the project will be contain only attached dwelling units. In the lower Hudson Valley, the vast majority of these "new" residents will

A metric measure used to compare the emissions from different greenhouse gases based upon their <u>global warming potential (GWP</u>). The carbon dioxide equivalent for a gas is derived by multiplying the tons of the gas by its associated GWP. In ARCHIBUS total emissions is expressed as MTCO₂ that is calculated by adding the metric tons of carbon dioxide emissions with the metric ton carbon dioxide equivalents for methane and nitrous oxide.

Total Emissions (MTCO₂) = Emissions MTCO₂ + CH₄ Emissions (MTCO₂ Eq.) + N₂O Emissions (MTCO₂ Eq.).

¹⁰ Tons of carbon are a factor of about 4 times less than CO₂ based upon the appropriate molecular weights.

Metric tons of carbon dioxide equivalent (MTCO₂ Eq.)

¹² This is B. Laing associates. Inc.'s professional opinion based upon prior project experience and alternatives analyses in the Hudson Valley.

purchase and move into single family homes¹³. Therefore, on a unit to unit and person to person comparison of emissions, apartments generally would show a 43% lower carbon utilization. However, a single family home development on this site would have fewer units.

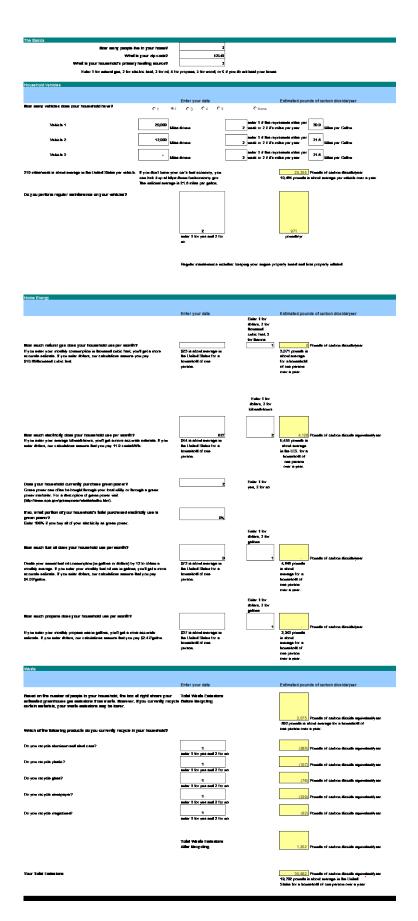
TABLE 1 GHG Compilations

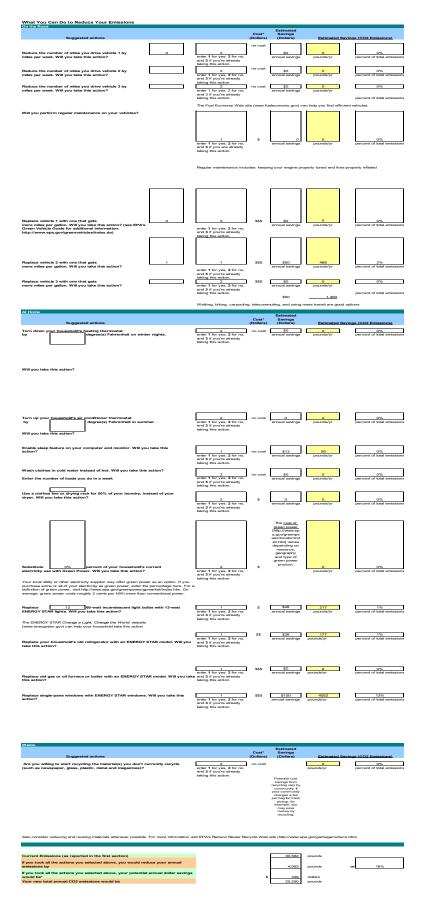
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www.blaingass		TING 103 FOR S			0, Fax: (631) 261-7	
CARBON F	OOTPRIN	T ASSESSMENT TOTAL	S (Operat	ional)		
PROJECT:	SHEFFIEL	D APARTMENTS				
IUMBER:	EPPMTG0	1	12/13/2023			
Scenario: I	Multi-fami	ly Units (1-2 Bedrooms)				
	Uses		Pounds/Year	# Units	Pounds Per Year	
		Electric	4126	261	1,076,886	
		Gas	0		-	
		Waste	2075		- ,	
		Transport	25255			
		Uses Total: lbs			8,210,016	
	Cradita	Uses Total: tons	15.728			
	Credits	Electric	0	0	_	
		Gas	0			
		Recycle	700		182,700	
		Credits Total:	700	201	102,700	
					Pounds Per Year	Tons Per Yea
	Unit Typ	e Subtotal:			8,027,316	4,01
3cenario: P	Project Act	tion - Commercial				
	Uses		Pounds/Year	# I Inite	Pounds Per Year	
	0000	Electric	1773371	3.1		
		Gas	0			
		Waste	95			
		Transport	88382.8	3.1	273987	
		Uses Total: lbs	88477.8		5771731	
		Uses Total: tons	44.2			
	Credits	E			10=0	
	-	Electric	605			
		Gas	2002			
		Recycle Sequestration/preserved acres	2992 1600			
		Credits Total:	1000	11.2	29071	
		C. Carlo Total.			Pounds Per Year	Tons Per Year
			Unit Typ	e Subtotal:	5742660.58	2,87
		+			PROJECT TOTAL:	6,88

¹³ IBID.

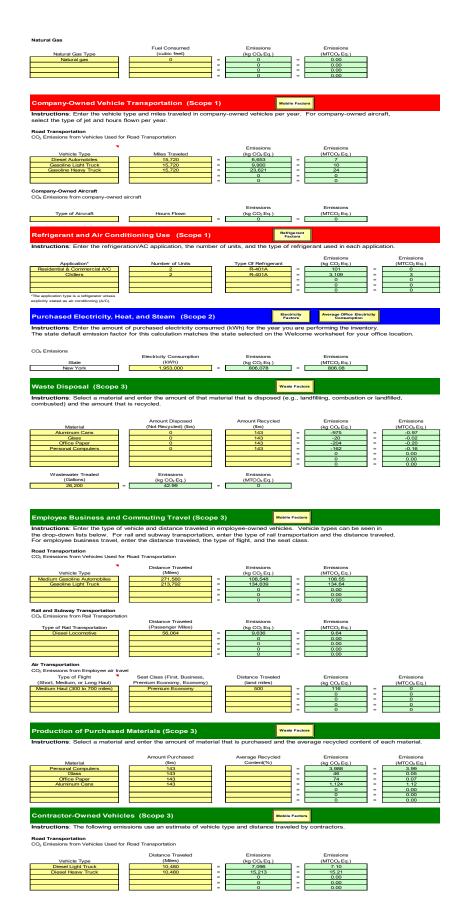
ATTACHMENT A

CO₂ EMISSION ANALYSIS FOR RESIDENTIAL SCENARIO





ATTACHMENT B CO₂ EMISSION ANALYSIS FOR COMMERCIAL SOURCE



	Total Emissions
	(MTCO ₂ Eq.)
Scope 1 Emissions	CO ₂
On-Site Electricity Generation	0.0
Natural Gas	0.0
Company-Owned Vehicle Transportation	40.2
Road Transportation	40.2
Aircraft	0.0
Refrigerant and Air Conditioning Use	3.2
Scope 2 Emissions	
Purchased Electricity	806.1
Other Emissions	
Other	0.0
·	
Total Emissions (excluding Scope 3)	849.5

^{*}NE indicates emissions were not estimated for this source.

Note: Calculations based on 10,000 square feet.

^{*}NA indicates this particular emission is not applicable for this source.

ATTACHMENT C GHG "STANDARDS" IN NEW YORK STATE

NYSDEC has no "standard" per se for greenhouse gas emissions other than compliance with National/State Ambient Air Quality Standards - NAAQS/SAAQS which is provided in the Level 1 NYSDOT Manual analysis in Section III.5 and the Air Quality Appendix. The project will make "best practices" efforts as described to reduce its Greenhouse Gas – carbon equivalent footprint. Further, for larger projects (see above) a "best practices" standard for GHG reduction and mitigation applies. Handbook, 4th Edition Chapter 5: Environmental Impact Statements, Section 53 states/tests whether or not a project could have or trigger a:

"reasonably foreseeable catastrophic impact..." Catastrophic impact" is not defined in the SEQR regulations. However, several examples of projects that could result in catastrophic impacts are provided in the regulation, including development and operation of oil supertanker ports, liquid propane or liquid natural gas storage facilities, and hazardous waste treatment facilities. In contrast, the [GHG] regulations exclude ordinary projects like large shopping malls, residential developments, or office complexes."

Thus, this impact definition does not apply to this project.