Appendix C: Air Quality

To: Glen Price, NYCDCP
From: CSA Group, WSP
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Project: Atlantic Avenue Mixed-Use Plan (AAMUP)
Reference: Air Quality Analysis Methodology and Assumptions (Revised)

INTRODUCTION

The Proposed Actions, located in Crown Heights Brooklyn, New York, would alter traffic patterns and potentially increase volumes in the study area, create new stationary sources, as well as locate sensitive receptors near stationary sources. As a result of these potential changes, air quality conditions in terms of localized pollutant levels, could also be affected. To determine the extent of these changes, an air quality analysis will be conducted for the Atlantic Avenue Mixed-Use Plan (AAMUP) for mobile sources and stationary sources.

The purpose of this memorandum is to describe the air quality analysis approach for the projected and potential development sites for the AAMUP EIS. A total of **71 development sites** (55 projected and 16 potential) have been identified within the rezoning area. Under the reasonable worst case development scenario (RWCDS) for the Proposed Actions, the total development expected to occur on the 72 development sites under the With-Action condition would include 6,657,597 square feet, including 5,320,984 square feet (5,143 units) of residential uses, 48,548 square feet of medical office uses, 340,854 square feet of other community facility uses, 347,132 square feet of local retail, 50,410 square feet of destination retail, 472,574 square feet of office, and 77,095 of industrial uses. The projects analysis year is 2034.

The following outline of methodology and assumptions is based on guidelines contained in the 2021 *CEQR Technical Manual*.

MOBILE SOURCE ANALYSIS

Pollutants of Concern

The microscale analysis will evaluate the potential impacts that the proposed rezoning will have on localized CO, PM_{10}, and $PM_{2.5}$ levels in the study area as a result of adding project-generated vehicles. Selected sites will be analyzed based on the RWCDS supplied by NYCDCP.

Dispersion and Emissions Modeling for Microscale Analyses

Dispersion Modeling

The CO, PM_{10}, and $PM_{2.5}$ mobile source analyses will be conducted using the AERMOD model at all intersections identified. AERMOD[1] is a versatile model capable of predicting pollutant concentrations from continuous point, area, and volume sources. It has replaced the EPA's CAL3QHCR, for modeling air quality near roadways, and other ground-level sources. The model classifies emission sources within a project as line, area, volume, or point sources. Like CAL3QHCR, the model incorporates meteorological data. Based on the locations of the proposed Actions, the most recently available five years of

[1] EPA, User's Guide for the AMS/EPA Regulatory Model (AERMOD), EPA-454/B-22-007 June 2022

meteorological data from LaGuardia Airport and concurrent upper air data from Brookhaven, New York will be used in the modeling.

Multiple receptors will be modeled at each of the selected sites; for microscale analyses, receptors will be placed along approach and departure links at spaced intervals at a pedestrian height of 1.8 meters. Based on the City's guidance for $PM_{2.5}$ neighborhood-scale corridor modeling, receptors in that analysis will be placed 15 meters from the nearest moving lane at each analysis location.

Emission Factors

Vehicular cruise and idle CO and PM emission factors to be utilized in the dispersion modeling will be computed using EPA's mobile source emissions model, Motor Vehicle Emission Simulator, or MOVES3.[2] This emissions model is capable of calculating engine emission factors for various vehicle types, based on the fuel type (gasoline, diesel, or natural gas), meteorological conditions, vehicle speeds, vehicle age, roadway types, number of starts per day, engine soak time, and various other factors that influence emissions, such as inspection maintenance programs. For PM, emissions from brake and tire wear would also be included. Project specific traffic data obtained through field studies as well as county-specific hourly temperature and relative humidity data obtained from the New York State Department of Environmental Conservation (NYSDEC) will be used.

In order to account for the suspension of fugitive road dust in the air from vehicular traffic in the local microscale analysis, PM_{10} and $PM_{2.5}$ emission rates will include fugitive road dust. However, since the New York City Department of Environmental Protection (NYCDEP) considers fugitive road dust to have an insignificant contribution on a neighborhood scale, fugitive road dust will not be included in the neighborhood scale $PM_{2.5}$ microscale analyses. Road dust emission factors will be calculated according to the latest procedure delineated by EPA[3] and the *CEQR Technical Manual*.

The EPA protocol for determining maximum $PM_{2.5}$ concentrations requires producing quarterly emissions factors. Quarterly (seasonal) and off-peak emission factors can be prepared using additional runs of the MOVES model. This involves creating season-specific meteorological data files for each $PM_{2.5}$ MOVES run. Peak traffic volumes will be used as a worst-case scenario to conservatively predict emissions factors for the entire year. If further refinements are necessary, the potential for additional and/or more detailed traffic data to be used within the air quality analysis will be discussed with NYCDCP. Speed data used within the MOVES model will be obtained from information gathered during the traffic data collection program.

Analysis Locations

Preliminary analysis locations will be selected based on traffic projections for the Proposed Actions and other studies and historic observations (which identify high levels of congestion at these locations) include:

Carbon Monoxide

The final selection of analysis sites will be completed when trip generation and assignment information is finalized and made available. If the traffic study results in intersections that would surpass the

[2] EPA, MOVES Model, User Guide for MOVES3, EPA-420-B-15-095 November 2015

[3] EPA, Compilations of Air Pollutant Emission Factors AP-42, Fifth Edition, Volume I: Stationary Point and Area Sources, Ch. 13.2.1, NC, http://www.epa.gov/ttn/chief/ap42, January 2011.

screening limit of 170 vehicle trips, justification for their inclusion will be provided to NYCDCP for review and approval. It is assumed that no more than two "worst case" (2) intersections in total will be analyzed for CO. The site selection will be based on the CEQR intersection screening analysis and the assumption that the selected intersections would surpass the CEQR 170 trip screening limit for this area of the city. The site selection will also take into account existing level of service (LOS), overall ~~Build~~ With-Action vehicular volumes, and vehicle classification (% heavy vehicles) during the project's peak hours. The CO analysis will predict one-hour and eight-hour concentrations and compare them to the NAAQS and CEQR CO *de minimis* criteria.

PM_{10} and $PM_{2.5}$

The proposed project is located in a section of Crown Heights Brooklyn that contains industrial and commercial businesses which generate high volumes of heavy-duty diesel vehicles. The addition of project-generated heavy-duty diesel vehicles (HDDV) and to a lesser degree light-duty gasoline vehicles (LDGV) could impact localized PM emissions. As a result, it is anticipated that an analysis of PM_{10} and $PM_{2.5}$ will be conducted at up to three (3) "worst case" intersections. The selection will be based on project-generated trip data using the CEQR screening procedure for $PM_{2.5}$. Should the screening procedure show that the number of project-generated HDDV equivalents will not surpass the screening thresholds, no further analysis of mobile source PM will be conducted. However, it is anticipated that at least two (2) locations will fail the screening procedure. If more than two intersections fail the screening, the worst-case locations that result in the highest number of project-generated HDDV equivalents will be selected for analysis. The AERMOD model will be used to predict PM_{10} and $PM_{2.5}$ concentrations and an analysis will be conducted to assess whether microscale 24-hour and neighborhood scale annual concentration levels are below CEQR $PM_{2.5}$ *de minimis* criteria and the National Ambient Air Quality Standards (NAAQS).

It is anticipated that the Proposed Action would result in many intersections which surpass the CO and PM2.5 screening criteria as described above. As a result, once the list of intersections that surpass the CEQR screening criteria have been identified, intersections will be further ranked by considering those with the largest overall traffic volumes, and worst existing congestion or level of service (LOS) and traffic volumes. The top intersections for CO and PM will then be selected and assessed as described above.

Parking Facilities Analysis

Based on the results of the traffic parking accumulation study conducted for the proposed action, the worst-case parking facility, in terms of size, location, and peak traffic "ins/outs," will be selected for the analysis of CO and $PM_{2.5}$. Utilizing CEQR Technical Manual procedures, once the facility is selected for analysis, the peak period with the greatest number of vehicular ins/outs and traffic on the roadway nearby will be studied. The methodology for analysis will follow that of the CEQR Technical Manual for parking facilities. Vehicular emissions considered would be from the movement of vehicles within the parking facility and any vehicles idling before exiting. If any of the analyzed intersections are in close proximity to a studied parking facility, the cumulative effect of both sources will be reported. If necessary, both ground level and elevated receptors will be considered for locations both onsite and offsite of the Projected or Potential Development Site parking facility.

Background Concentrations

Background concentrations for all pollutants used in the analyses will be determined using the most recent data available from NYSDEC. Data will be from monitoring stations representative of the county or from the nearest available monitoring station. Applicable averaging times will be determined from referencing the *CEQR Technical Manual* for CO, PM_{10}, and $PM_{2.5}$.

STATIONARY SOURCE ANALYSIS

Heating Ventilation and Air Conditioning (HVAC) Systems

A significant consideration in the analysis of Project stationary source impacts on nearby existing buildings is the mandate that use of fossil fuels in new construction begin phase out in 2024 (Local Law 154). New construction in NYC must use electric based HVAC systems beginning in 2024 for low-rise buildings (1-2 family homes and buildings less than 7 stores). Final phase-in for buildings taller than 7 stories with at least 50% affordable units begins January 1, 2028. The analysis year for the Project (2034) is beyond the final phase-in date of Local Law 154, thus it is expected that HVAC systems in new construction would not use fossil fuels in most circumstances and screening of Project HVAC systems will not be needed.

However, due to uncertainties regarding the implementation of Local Law 154, HVAC screening will be conducted following the screening procedures outlined in the December 2021 CEQR Technical Manual assuming the use of fossil fuels. The potential for impacts on existing developments as well as "project-on-project impacts" for both projected and potential development sites will be evaluated. The nearest existing building and/or projected development of a similar or greater height will be analyzed as the potential receptor. Since HVAC system design information is not available for any locations that need evaluation, it will be assumed that exhaust stacks would be located 3 feet above roof height (as per the CEQR Technical Manual) for the screening analysis.

If a screening analysis demonstrates the potential for an air quality impact, a refined modeling analysis will be performed for that development site using the AERMOD model. The most recently available five years of meteorological data from LaGuardia Airport and concurrent upper air data from Brookhaven, New York will be used in the modeling.

Concentrations of nitrogen dioxide (NO_2), and particulate matter ($PM_{2.5}$) will be determined at affected sites. Modeling for sulfur dioxide (SO_2) will not be included due to no use of fuel oil in new buildings and inherently low sulfur content of natural gas. Receptors would be placed at elevated locations on all facades and at multiple elevations on buildings that were predicted to be potentially impacted based on the screening analysis, to identify maximum pollutant concentrations. Predicted values will be compared with National Ambient Air Quality Standards (NAAQS) for NO_2, and the City's CEQR de minimis criteria for $PM_{2.5}$. In the event that violations of standards are predicted, an air quality E-designation would be proposed for the site, describing the fuel and/or HVAC exhaust stack restrictions that would be required to avoid a significant adverse air quality impact.

HVAC Cluster Analysis

It is anticipated that a cumulative impact analysis will be performed for development sites with a similar height located in close proximity to one another (i.e., site clusters). The proposed action area will be

studied to determine cluster selection. Development sites will be evaluated for grouping based on the following criteria:

- Density and scale of development;
- Similarity of height; and
- Proximity to other buildings of a similar or greater height.

Final selection of specific cluster locations for analysis will be submitted to DCP for review. If additional clusters warrant analysis, justification for their inclusion will be provided to DCP for review and approval; however, no more than three (3) clusters in total will be analyzed.

The HVAC cluster analysis will be performed using the most recent version of the EPA AERSCREEN Model (currently Version 21112). The AERSCREEN model is a screening version of the AERMOD refined model and is used for determining maximum concentrations from a single source using predefined meteorological conditions. The AERSCREEN analysis will be performed to identify impacts of NO_2, and $PM_{2.5}$.

The AERSCREEN model predicts impacts over a 1-hour average using default meteorology. In order to predict pollutant concentrations over longer periods of time, EPA-referenced persistence factors will be used. These consist of 0.6 and 0.1 for the 24-hour and annual average periods, respectively.

Emissions Estimation
Using information in the Air Quality Appendix of the CEQR Technical Manual, an estimate of the emissions from the development's HVAC systems will be made. The appendix includes tables which can be used to estimate emissions based on the development size, type of fuel used and type of construction.

The latest natural gas consumption factors will be used for residential and commercial development, where applicable. Mixed-use developments will use the residential natural gas consumption factor since it is more conservative. Short-term factors will be determined by using peak hourly fuel consumption estimates for heating and cooling systems. Consumption factors will be combined with emission factors for emission rate determination. Emission factors for natural gas will be obtained from the EPA Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume I: Stationary Point and Area Sources. It is assumed fuel oil will not be used and will not be evaluated for residential, commercial and mixed-use developments.

The distance from the sources to the nearest buildings will be used in the modeling analysis. The analysis will focus on existing buildings or other projected or potential development sites which are of a similar or greater height than the source.

<u>Industrial Source Analysis</u>

In 2014 for a prior stationary source air quality methodology memorandum for what was then known as M Crown Rezoning, City Planning identified potential process and manufacturing sources located within a radius of 400 feet of the development sites. An updated assessment of potential process and manufacturing sources located within a radius of 400 feet has been prepared using the NYCDEP Clean Air Tracking System (CATS) database. A total of 43 industrial source permits have been identified. Any

industrial sources beyond 400 feet of a projected or potential development site were excluded from analysis. In addition, the analysis excludes existing industrial sources located at projected development sites since the proposed action assumes that all such sites would be redeveloped. However, for potential development sites, the industrial analysis will be performed two ways, as follows:

- Assuming the site is developed, in which case the industrial source is not assumed to be operating in the with-action Condition. In this case, potential air quality impacts from other industrial sources in the study area will be analyzed to evaluate their potential effects on the development site.

- Assuming the site is not developed, in which case the industrial source is assumed to be operating in the with-action Condition, and its potential effects on other projected development sites will be determined.

Figure 1 presents the existing industrial sources based on entries in the NYCDEP CATS database. As shown in Table 1, of the **43 industrial** source permits found within the project area, a total of 19 permits potentially requiring analysis were determined to be within the development boundary or located within the projected development site. Of these 19 permits, 15 permits are industrial source permits that will be included in the industrial source analysis. The remaining 4 permits within the development boundary are permits for boilers or general industrial registration that need not be included in the analysis.

A field survey will be performed to confirm the operational status of the sites identified in the permit search, and to identify any additional sites having emission sources that would warrant an analysis. If any such sources are identified, further consultation will be made with DCP to determine procedures for estimating emissions from these sources.

Table 2 summarizes the projected development sites proposed for the Atlantic Avenue Rezoning EIS and identifies whether industrial sources were identified within 400 feet of the site. Table 3 summarizes the potential development sites proposed for the AAMUP EIS. As seen in the tables, 52 of the 56 projected development sites (Table 2) and 14 of the 16 potential development sites (Table 3) are located within 400 feet of an analyzed industrial source. Therefore, these sites will be considered as receptors for the industrial source air quality analysis. Development sites will not be considered as receptors for the industrial source analysis if there are no industrial sources analyzed that are located within 400 feet of the site.

State Facility and Title V (Major) Sources

A review of New York State Department of Environmental Conservation (NYSDEC) Title V and State Facility draft and issued permits database and the Environmental Protection Agency (EPA) database was performed to identify any Title V (major) or state facility-permitted (minor) facilities. No existing state facility and Title V permitted emission sources within 1,000 feet of the development sites were identified. Figure 2 shows the project development area and the 1,000-foot boundary. If any Title V or state facility sources not found in the NYSDEC database are otherwise identified (such as proposed facilities not yet in the database), an analysis of these sources will be performed to assess their potential effects on potential development sites. Pollutant concentrations will be predicted using the AERSCREEN model compared with NAAQS for NO_2, SO_2, PM_{10}, and $PM_{2.5}$. In the event that an exceedance of a standard is predicted, a refined modeling analysis using the EPA AERMOD model will be performed.

Figure 1. Existing Industrial Source Permits within 400 Feet

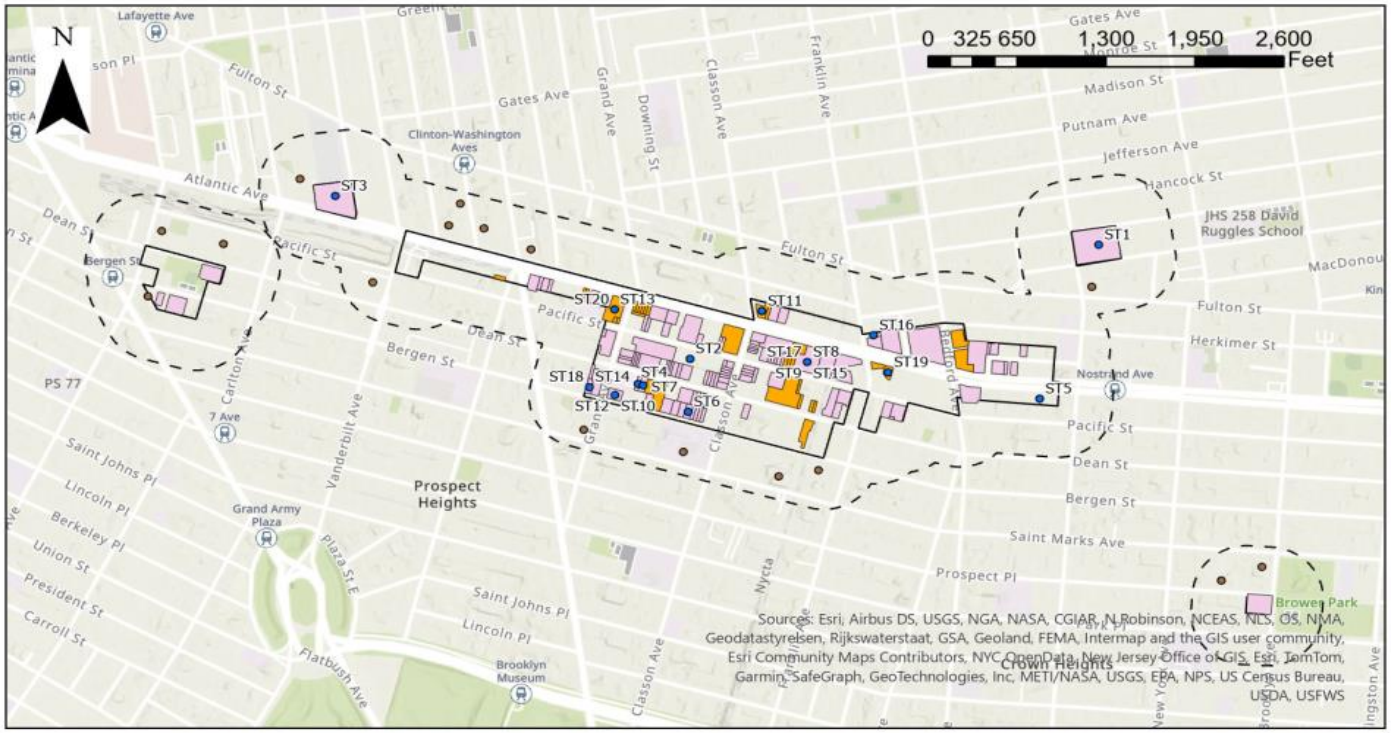


Table 1. NYCDEP CATS Industrial Source Permits

ID	Application ID	Address	Block	Lot	Within project Footprint (Y/N)	To Be Analyzed (Y/N)
ST1	CW000318	510 CLERMONT AVENUE	2008	1	Y	N
ST2	PA020179	1260 ATLANTIC AVENUE	1200	27	Y	Y
ST3	PA025892	835 BERGEN STREET	1141	59	Y	Y
ST4	PA008596	868 DEAN STREET	1141	18	Y	Y
ST5	PA044099	870 DEAN STREET	1141	19	Y	Y
ST6	PB406803	565 GRAND AVENUE	1141	1	Y	Y
ST7	PB425403	1025 ATLANTIC AVENUE	2020	1	Y	Y
ST8	PB426303	565 GRAND AVENUE	1141	1	Y	Y
ST9	PB031411	976 ATLANTIC AVENUE	1124	37	Y	Y
ST10	PB012206	773 BERGEN STREET	1140	44	Y	Y
ST11	PB014015	1102 ATLANTIC AVENUE	1126	29	N	Y
ST12	PB041607	1010 PACIFIC STREET	1133	32	Y	Y
ST13	PB021715	1102 ATLANTIC AVENUE	1126	29	Y	Y
ST14	PB021815	1093 PACIFIC STREET	1126	29	Y	Y
ST15	PR004817	980 ATLANTIC AVENUE	1124	37	Y	N
ST16	PW000320	1093 PACIFIC STREET	1126	29	Y	Y
ST17	PW004418	773 BERGEN STREET	1140	44	Y	Y
ST18	PW008618	1154 ATLANTIC AVENUE	1199	12	Y	Y
ST19	PR027618	557 FRANKLIN AVENUE	2021	4	Y	N
ST20	CA342493	475 NOSTRAND AVENUE	1844	1	Y	N
ST21	CW015018	550 VANDERBILT AVENUE	1129	1	N	N
ST22	CW003022	595 DEAN STREET	1129	50	N	N
ST23	PA088886	696 PACIFIC STREET	1128	1	N	Y
ST24	PA088986	696 PACIFIC STREET	1128	1	N	Y
ST25	PA042194	924 BERGEN STREET	1149	41	N	Y
ST26	PA042294	924 BERGEN STREET	1149	10	N	Y
ST27	PB085403	443 ST. MARKS AVENUE	1148	50	N	Y
ST28	PB477603	365 ST MARKS AVENUE	1147	34	N	Y
ST29	PB004515	505 ST. MARKS AVENUE	1149	72	N	Y
ST30	PB010811	547 CLINTON AVENUE	2011	1	N	Y
ST31	PB047913	547 CLINTON AVENUE	2011	1	N	Y
ST32	PB054902	551 WAVERLY AVE.	2012	1	N	Y
ST33	PB025110	1297 FULTON STREET	1849	55	N	Y
ST34	PG004819	1297 FULTON STREET	1849	55	N	Y
ST35	PR000323	550 VANDERBILT AVENUE	1129	1	N	N

ID	Application ID	Address	Block	Lot	Within project Footprint (Y/N)	To Be Analyzed (Y/N)
ST36	PR002521	662 PACIFIC STREET	1128	5	N	N
ST37	PR015922	595 DEAN STREET	1129	50	N	N
ST38	PR024521	595 DEAN STREET	1129	50	N	N
ST39	PR030018	73 6TH AVENUE	1143	8	N	N
ST40	CA166187	555 WASHINGTON AVENUE	2013	1	N	N
ST41	CA258785	850 ST. MARKS AVENUE	1228	37	N	N
ST42	CB031412	925 PROSPECT PLACE	1228	60	N	Y
ST43	CB376200	491 CARLTON AVENUE	2007	1	N	Y

Table 2. Projected Development Sites

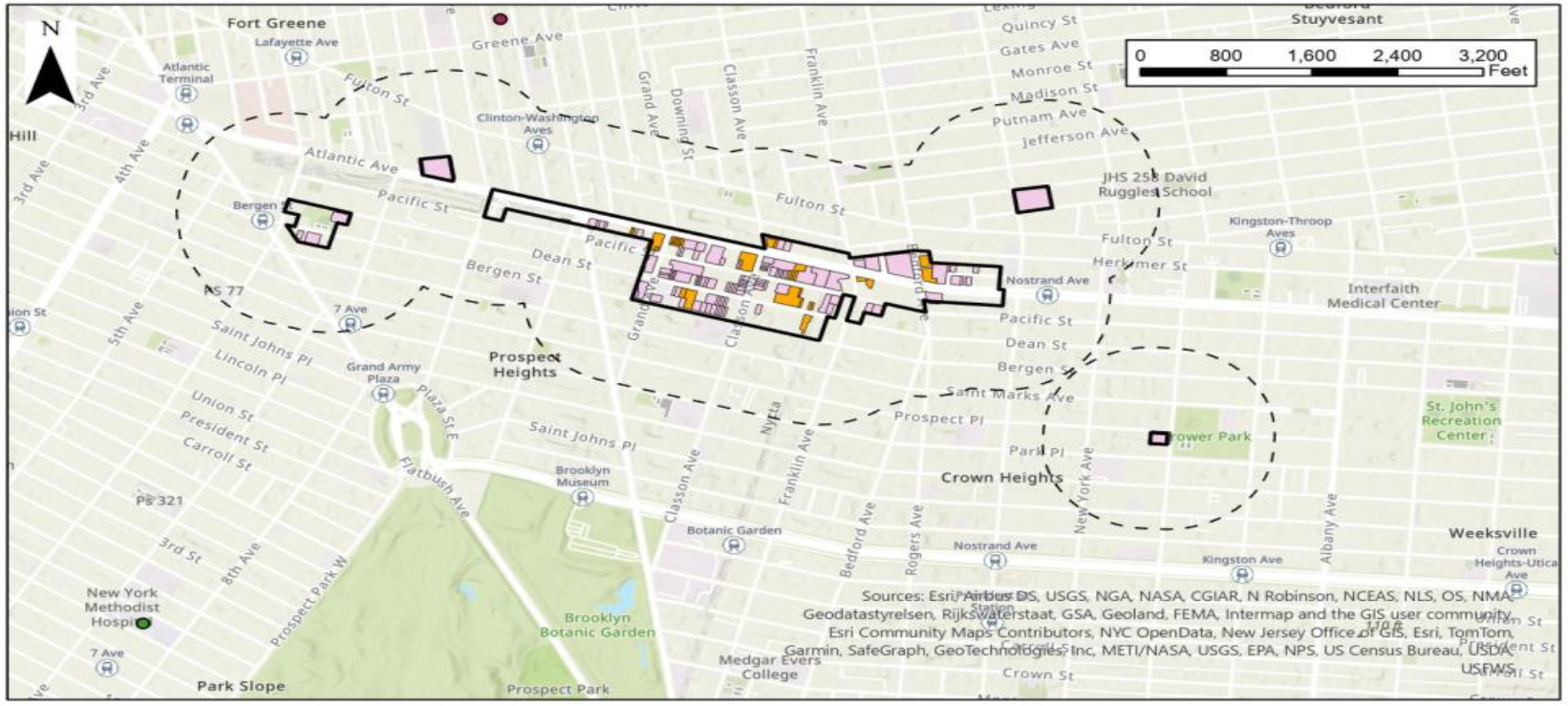
Site ID	Block	Lot(s)	Within 400 Feet of an Industrial Source?
SSID 5 C6-3A PR	1124	4, 10	Y
SSID 6 C6-3A PR	1124	11, 14	Y
SSID 7 C6-3A PR	1124	29	Y
SSID 10 C6-3A-M1(4)-R6A PR	1125	10, 80, 81	Y
SSID 12 C6-3A PR	1125	16	Y
SSID 13 C6-3A-M1(4)-R6A PR	1125	25	Y
SSID 16 M1(4)-R6A PR	1125	72	Y
SSID 17 M1(4)-R6A PR	1125	52, 53	Y
SSID 18 C6-3A PR	1126	13, 7, 8	Y
SSID 21 M1(5)R9A & M1(4)R6 PR	1126	57	Y
SSID 22 M1(4)-R7D PR	1126	3, 4, 105	Y
SSID 20 C6-3A-M1(4)-R6A PR	1126	78,79,80	Y
SSID 23 M1(4)-R6A PR	1126	81-86	Y
SSID 25 C6-3A PR	2020	86, 89	Y
SSID 28 C6-3A-C4-3A PR	2021	1, 20	Y
SSID 29 C6-3A-C4-3A-C4-5D PR	2022	1	Y
SSID 32 M1(4)-M1(5) PR	1865	95	N
SSID 33 M1(3)-R6B PR	1865	87	N
SSID 35 M1(3)-R6B PR	1865	71, 72	Y
SSID 36 C6-3A PR	1866	7, 1	Y
SSID 40 C6-3A PR Air Rights	1200	5	N
SSID 42 M1(4)-R7D PR	1132	34, 37	Y
SSID 44 M1(3)-R6A-M1(4)-R7D PR	1133	13	Y

Site ID	Block	Lot(s)	Within 400 Feet of an Industrial Source?
SSID 45 M1(4)-R7D PR	1133	49, 48	Y
SSID 46 M1(4)-R7D PR	1133	51 - 55, 57	Y
SSID 47 M1(4)-R6A PR	1133	60, 61, 62, 63	Y
SSID 49 M1(4)-R6A PR	1133	67	Y
SSID 50 M1(4)-R6A PR	1133	71, 72, 74, 75, 76	Y
SSID 51 M1(4)-R6A PR	1133	91, 80, 90, 89	Y
SSID 52 M1(4)-R7D PR	1133	1, 3	Y
SSID 53 M1(4)-R7D PR	1133	4	Y
SSID 54 M1(4)-R7D PR	1134	8, 11, 9, 5, 7	Y
SSID 56 M1(4)-R6A PR	1134	17	Y
SSID 59 M1(4)-R6A PR	1134	64, 67	Y
SSID 61 M1(4)-R7D PR	1140	35, 44, 31	Y
SSID 62 M1(4)-R7D PR	1141	1	Y
SSID 64 M1(4)-R6A PR	1141	37, 38, 39, 40, 33	Y
SSID 65 M1(4)-R6A PR	1141	55, 56, 57, 58	Y
SSID 66 M1(4)-R6A PR	1141	62, 128	Y
SSID 67 M1(4)-R6A PR	1141	73	Y
SSID 68 M1(4)-R6A PR	1142	10	Y
SSID 69 M1(4)-R6A PR	1141	59, 61	Y
SSID 71 M1(4)-R6A PR	1125	61	Y
SSID 72 M1(4)-R6A PR	1125	18, 19	Y
Lot 44 M1(4)-R6A PR	1134	44	Y
MTA Cable M1(5)R9A M1(4)R6A	1126	32	Y
HPD Site1 - Dean	1136	29, 32, 33, 34, 35	Y
HPD Site2 - Bergen	1143	25	Y
1134 Pacific R7A	1205	11, 14, 111	N
GMDC C6-3A & R6A M1-4	1126	29	Y
Lot 9 C6-3A PR	1866	9	Y
PS 753 C6-4	2008	1	Y
Lot 77 M1(3)-R6B PR	1865	77	Y
BK Adult Learning Center R7-2	1844	1	Y
506 Bergen St FBO R7D	1143	20	Y
PS 138 Annex R6	1235	37	Y

Table 3. Potential Development Sites

Site ID	Block	Lot(s)	Within 400 Feet of an Industrial Source?
SSID 4 C6-3A PT	1122	37	Y
Lots 26 + 27 C6-3A PT	1124	26, 27	Y
SSID 8 C6-3A-M1(4)-R7D PT	1124	37, 46, 47	Y
SSID 9 C6-3A PT	1125	2, 4, 5, 6	Y
SSID 11 C6-3A PT	1125	7, 8, 9	Y
SSID 15 C6-3A-M1(4)-R7D PT	1125	40	Y
SSID 24 C6-3A PT	2020	92, 1	Y
SSID 38 M1(3)-R6A PT	1199	8	Y
SSID 39 M1(3)-R6A PT	1199	12	Y
SSID 70 M1(4)-R6A PT	1142	34	Y
Lots 73 + 74 M1(4)-R6A PT	1134	73, 74	Y
SSID 20 C6-3A-M1(4)-R6A PR	1126	78, 79, 80	Y
SSID 30 C4-5D PR	1865	10	N
SSID 31 C6-3A-C4-5D PR	1865	1,3	N
SSID 57 M1(4)-R6A PR	1134	29, 78, 81	Y
SSID 63 M1(4)-R6A PR	1141	21, 69	Y

Figure 2. Title V and State Facility Permits within 1000 Feet



Atlantic Avenue Mixed-Use Plan

Figure 2
State Facility and Title V Facility