

March 25, 2025

Donna Brown Clerk of the Prince George's County Council 1301 McCormick Drive Largo, Maryland 20774

Subject: Request to Disapprove or Remand Detailed Site Plan 22001 – McDonald's on Ager Road

Dear Ms. Brown,

For the reasons below and others, I respectfully urge the District Council to disapprove Detailed Site Plan 22001 – McDonald's on Ager Road (DSP 22001). In alternative, I urge the District Council to remand the case to the Planning Board for a *de novo* review with a directive to examine more fully this project's potential impacts on the environment, public safety (particularly road safety for the most vulnerable users: cyclists and pedestrians), traffic congestion, public health, historical preservation, or climate change, and to examine more fully whether this project is consistent with the purposes and goals of the Zoning Ordinance, the County's General Plan (Plan 2035), relevant Functional Master Plans, the County's Climate Action Plan, and other relevant policy documents, especially those focused on healthy food, food equity, and public health.

Please ensure that these comments are included in the public record for DSP 22001.

I am filing these supplemental comments for protective and cautionary reasons, and their filing does not preclude the raising of these and any other issues before the District Council.

Where they do not conflict with my own stated positions, I incorporate by reference comments submitted by Melissa Schweisguth, Marybeth Shea, Jeff Cronin, Lisa Entzminger, Alexi Boado, the Cesar Chavez PTO, the Sierra Club, Friends of Sligo Creek, Neighbors of the Northwest Branch, and others to the Planning Board and the District.

Issues and Objections

1. Based upon the facts below and other evidence in the record, the Applicant has failed to meet the burden of proof imposed by Section 27-142 of the Zoning Ordinance, and has failed to demonstrate that this project is consistent with, conforms to, or supports the attainment of purposes and goals of Zoning Ordinance, the County's General Plan (Plan 2035), relevant Functional Master Plans, the County's Climate Action Plan, and other relevant policy documents, especially those focused on healthy food, food equity, and public health. In fact, there is ample evidence that this project would undermine the attainment of multiple goals and policies laid out in the Zoning Ordinance, county plans, and other county policy documents.

- 2. The Planning Board erred in refusing, generally, to consider off-site impacts and refusing to consider significant aspects of the site's context, including those related to transportation safety and public health.
- 3. The Planning Board erred when it decided not to consider the potential public health impacts of this project in a community documented to be burden with multiple social, economic, environmental, and health stressors.

Section 27-284 of the Zoning Ordinance *requires* a DSP to be referred to the Health Department and charges the Department with assessing the distribution of potential health impacts in the community. In this case, those impacts fall upon a community that already is burdened with multiple social, environmental, and economic stressors, so many that it appears to be an Environmental Justice Community, based on screening tools offered by the US Environmental Protection Agency, the Maryland Department of the Environment, and the University of Maryland School of Public Health.

Yet, inexplicably, the Planning Board's resolution approving DSP 22001 never mentions Section 27-284, never mentions the multiple stressors already burdening the neighboring, and never mentions relevant county policies and goals focused on health and the environment. In fact, the word "health" appears only twice the Board's resolution and only in referencing to health of trees on the property.

Risk factors and stressors already burdening the neighboring community include:

- very high percentages of residents who are person of color;
- relatively low income;
- high heat since this community is located in an intense urban heat island;
- high traffic volumes and high concentrations of toxic and carcinogenic traffic-related air pollution;
- high asthma rates;
- lack of health insurance;
- high percentages of people who do not speaking English,
- high percentages of children under five years old;
- an over-abundance of unhealthy food options and a lack of healthy food options; and
- unsafe conditions for pedestrians and bicyclists.

The cumulative impacts of these existing stressors and the added incremental impacts from this project should the examined. The damaging impacts of fast-food drive throughs are significant enough that, for a variety of reasons, jurisdictions are banning new drive throughs. Those jurisdictions include the City of Minneapolis, towns in California, Missouri and New Jersey, and most probably most recently, the City of Annapolis, which in December 2024, passed an ordinance prohibiting drive-through windows for new fast-food restaurants.

A Few Relevant Sections of the Zoning Ordinance

Sec. 27-284. Referral.

- (a) Prior to taking action on the Detailed Site Plan, the Planning Board shall refer the plan to the Historic Preservation Commission (Part 14), when appropriate, and to all agencies which the Planning Board deems appropriate for review and comment. The agencies shall include all of those whose action is likely to have a substantive effect on the plan under review. The Planning Board shall maintain a list of referral agencies. The plan shall also be referred to:
 - (1) the Prince George's County Police Department for review and comment. The Police Department may comment on issues relevant to their mission, including opportunities to implement crime-prevention measures, and to enhance the safety and security of residents, employees and other users of a project through implementation of the principles of Crime Prevention Through Environmental Design (CPTED); and
 - (2) the Prince George's County Health Department. The Health Department shall perform a health impact assessment review of the proposed development identifying the potential effects on the health of the population, and the distribution of those effects within the population, including recommendations for design components to increase positive health outcomes and minimize adverse health outcomes on the community.

Section 27-107.01(112.2) Health Impact Assessment Review: In this preliminary stage of implementing the health impact assessment review, it is defined as a tool that may include a combination of procedures, methods and tools by which a policy, program or project may be evaluated as to its potential effects on the health of a population, the distribution of those effects within the population, and provide a platform to make our communities healthier.

Sec. 27-142. Burden of proof.

The burden of proof in any zoning case shall be the applicant's.

Sec. 27-102. Purposes.

- (a) The purposes of the Zoning Ordinance are:
 - (1) To protect and promote the health, safety, morals comfort, convenience, and welfare of the present and future inhabitants of the County;
 - (2) To implement the General Plan, Area Master Plans, and Functional Master Plans;
 - (3) To promote the conservation, creation, and expansion of communities that will be developed with adequate public facilities and services;
 - (4) To guide the orderly growth and development of the County, while recognizing the needs of agriculture, housing, industry, and business;
 - (5) To provide adequate light, air, and privacy;
 - (6) To promote the most beneficial relationship between the uses of land and buildings and protect landowners from adverse impacts of adjoining development;

- (7) To protect the County from fire, flood, panic, and other dangers;
- (8) To provide sound, sanitary housing in a suitable and healthy living environment within the economic reach of all County residents;
- (9) To encourage economic development activities that provide desirable employment and a broad, protected tax base;
- (10) To prevent the overcrowding of land;
- (11) To lessen the danger and congestion of traffic on the streets, and to insure the continued usefulness of all elements of the transportation system for their planned functions;
- (12) To insure the social and economic stability of all parts of the County;
- (13) To protect against undue noise, and air and water pollution, and to encourage the preservation of stream valleys, steep slopes, lands of natural beauty, dense forests, scenic vistas, and other similar features;
- (14) To provide open space to protect scenic beauty and natural features of the County, as well as to provide recreational space; and
- (15) To protect and conserve the agricultural industry and natural resources.

Sec. 27-104. Minimum requirements.

In interpreting and applying the provisions of the Zoning Ordinance, they are the minimum requirements for the promotion of the purposes of this Subtitle.

This principle is so important that similar language appears, if I recall correctly. in the County's Subdivision Regulations, Water Resources Protection and Grading Ordinance, and Tree and Vegetation Ordinance.

To my knowledge, nothing in the Zoning Ordinance prevents the Planning Department or the Planning Board from requiring more and better from the applicant, especially in a community that clearly is already so over-burdened with multiple environmental, public health, social, and economic stressors, including the facts that it:

- Exists in a community that the County has identified as a Food Swamp, with an overabundance of unhealthy food options and a lack of healthy food options;
- Already suffers serious traffic congestion, high accident rates, high accident-related injuries, and pedestrian fatalities;
- Exists in an Intense Urban Heat Island due to an overabundance of pavement and buildings, and a serious lack of tree canopy, forests cover, and green space;
- Has multiple characteristics that typify an Environmental Justice community; and
- Is over-burdened with heavy traffic and elevated levels of ozone, diesel particulates, nitrogen dioxide, and probably other traffic-related air pollutants.

Notably, a significant body of research shows that people of color suffer from higher rates of Type 2 diabetes, obesity, and other conditions due to poor diets, lack of exercise, and other factors. Some studies have found a correlation between the proximity of fast food outlets and

obesity in nearby communities. At least one study found this impact to be greatest among African American women.

Anyone of these stressors merits consideration, and the cumulative impacts of so many stressors certainly should weigh heavily against approving this project.

Transportation Concerns: Impacts on Congestion and Safety, and a Flawed Analysis

The project fails to meet numerous goals and policies set forth in Plan 2035 and the County's Climate Action Plan, which call for reducing automobile use and increasing access via other modes of transportation.

The project is adjacent to a complex, five-point intersection that is routinely congested with long back ups, especially, but not exclusively during morning and evening rush hours. I know from experience biking through that intersection and crossing Riggs Road and Route 410 on the Sligo Creek path nearby that crossing those roads can be perilous.

Concerns Regarding the Project's Potential Environmental, Community, and Public Heath Impacts

Impacts on Sligo Creek and the Northwest Branch

The project site is within roughly 500 feet of Sligo Creek, which is a major tributary of the Northwest Branch of the Anacostia River. Areas downstream of the site are prone to flooding. FEMA 100-year floodplain delineations include the area where Sligo Creek passes under Riggs Road just south of the intersection of Riggs Road and East-West Highway.

Under Section 303(d) of the Clean Water Act, the Maryland Department of the Environment list the lower Northwest Branch and the Anacostia River as impaired for total suspended solids, biological oxygen demand, phosphorus, nitrogen, heptachlor epoxide, enterococcus, trash, and PCBs. The lower Northwest Branch may also be impaired for habitat alterations, lack of riparian buffer, chloride, and sulfate. Any additional loadings of those pollutants or degradation of those conditions should be avoided.

Impacts on Public Health, Climate Change and Environmental Justice

In addition, the US Environmental Protection Agency's Environmental Justice Screening Tool shows that the surrounding community is a vulnerable EJ community based on race, income, age, and existing environmental burdens, including elevated levels of traffic-related air pollution.

Specific relevant criteria include:

- Significantly higher than average percentages of people of color, residents who do not speak English, children under five, residents who lack health insurance, and residents with asthma:
- High traffic volumes, and elevated levels of traffic-related air pollutants, including nitrogen dioxide, diesel particulates, ozone, and almost certainly other toxic and carcinogenic emissions; and

• High temperatures

Maps provided by the Trust for Public Lands show the site and much of the surrounding area is part of an intense urban heat island, due to the replacement of forests and tree canopy with buildings and pavement. Please see the attached heat island maps and the attached pages excerpted from the County's Climate Action Plan. Satellite maps from Google Earth and street view photos from Google Maps, show that much the forested buffer on the site is, in fact, forest and substantial canopy contiguous with the forest and canopy on the Green Hill site.

Notably, a significant body of research shows that people of color suffer from higher rates of Type2 diabetes and other chronic disease due to poor diets, lack of exercise, and other factors. Regular exercise, convenient access to affordable, healthy food, access to green space, walkable communities, and removal of obstacles to exercise are major parts of the prescription for addressing this national epidemic.

The applicant's proposal to add impervious surface and a larger building will increase traffic and intensify and potentially intensify expand this urban heat island, with commensurate impacts on the public health and the environment.

Cars idling in the drive-through queue will emit a toxic stew of air pollutants including carbon monoxide, nitrogen dioxide, and polycyclic aromatic hydrocarbons, and fine and ultrafine particles that penetrate deeply into the lungs. They also will emit planet-heating carbon dioxide.

If the applicant has significantly understated the number of trips the project will generate throughout the day and during morning and evening peak traffic hours, this necessarily will lead to an underassessment of the project's potential impacts on congestion, safety, local air quality, public health, ad greenhouse gas emissions.

The Technical Staff Report, Staff Report Addenda, and the Technical Referral Memorandum submitted by the County Department of Health fail to address environmental justice or the distinct and cumulative impacts of these socio-economic factors, air pollution, excessive heat, the relative lack of access to healthy food options in this Food Swamp, and the excessive number of traffic accidents and injuries.

Please see the attached maps from the US EPA screening tool.

The Planning Board should require the applicant's plans and M-NCPPC's review to account for climate change as fully as possible, and should apply the best available data, information, analysis, science, and policies.

There is no evidence in the published record to demonstrate that applicant's current application and stormwater management plans account for clear evidence that climate change already is bringing more extreme weather – include more frequent, more severe storms – and that this trend will continue and possibly accelerate.

In its 2023 study, *The Precipitation Problem*, the First Street Foundation found that, due climate change, so-called 100-year storms now occur every 14 years in Baltimore and every 21 years in Washington, DC, and are likely to become more frequent over the next 30 years.

Data presented by the National Oceanic Atmospheric Administration in its *New Normals* show that total annual precipitation and the frequency and intensity of storms have increased in our region. For example, annual rainfall totals at BWI airport increased by nearly five and a half inches from the 1981-2010 period to the 2006-2020 period, which the Chesapeake Legal Alliance rightly describes as "an astounding rate of change in a climatological blink of an eye."

NOAA's New Normal data sets for annual precipitation, maximum temperatures, and average annual temperatures in Prince George's County and the District of Columbia show increases in all three metrics with decent years and decades generally showing the highest values.

Prince George's County and the State of Maryland are well aware that we face new climate normal. MDE is well aware that the data relied on for stormwater permits, flood plain permits and compensatory mitigation, erosion and sediment control plans, and other critical plans and decisions are obsolete, and have been obsolete for decades. MDE's Water and Science Administration refers the public to RAND's analysis of Atlas 14 data. RAND's robust demonstrates that Atlas 14 data and intensity duration, and frequency curves have under-forecast trends in recent years, and that they underestimate projected storms and precipitation.

In reviewing this and other land use proposals, the Planning Board should apply the best available data and analytical tools and should carefully assess whether the project conforms with the goals, policies, purposes, and requirements set forth in:

- Plan 2035 Prince George's;
- the County's 2022 Climate Action Plan;
- relevant county Functional Master Plans, including the Green Infrastructure Plan;
- relevant provisions of the Clean Water Act, applicable Maryland laws, and applicable county laws, including the County's Zoning Ordinance, Water Resources Protection and Grading Code, and Trees and Vegetation Ordinance; and
- relevant Watershed Restoration Plans and Agreements to which Prince George's County and/or the State of Maryland are signatories, which generally call for protecting and restoring floodplains and wetlands, and protecting and expanding forests and wetlands.

Thank you for your time and consideration.

Sincerely,

Greg Smith

4204 Farragut Street Hyattsville, Maryland 20781 gpsmith@igc.org 240-605-9238 Data presented by the National Oceanic Atmospheric Administration in its *New Normals* show that total annual precipitation and the frequency and intensity of storms have increased in our region. For example, annual rainfall totals at BWI airport increased by nearly five and a half inches from the 1981-2010 period to the 2006-2020 period, which the Chesapeake Legal Alliance rightly describes as "an astounding rate of change in a climatological blink of an eye."

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Thank you for your time and consideration.

Sincerely,

Greg Smith

4204 Farragut Street Hyattsville, Maryland 20781 gpsmith@igc.org

240-605-9238

DSP 21001 McDonald's on Ager Road Hearing

October 17, 2024

Submitted by Greg Smith

Zoning Ordinance Basics

Section 27-104. Minimum requirements.

In interpreting and applying the provisions of the Zoning Ordinance, they are the *minimum* requirements for the promotion of the purposes of this Subtitle.

Section 27-142. Burden of proof.

The burden of proof in any zoning case shall be the applicant's.

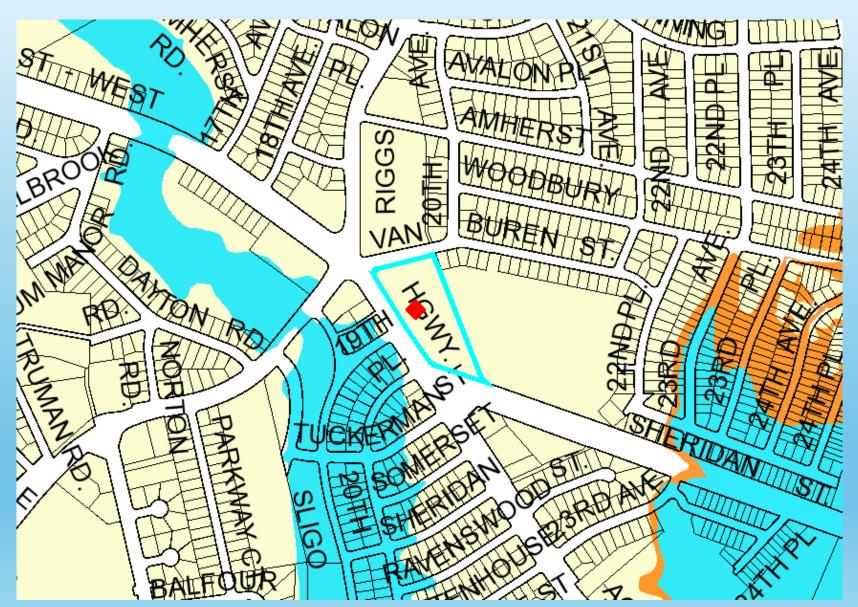
Section 102. Purposes of the Ordinance

- (1) To protect and promote the health, safety, morals comfort, convenience, and welfare of the present and future inhabitants of the County;
- (2) To implement the General Plan, Area Master Plans, and Functional Master Plans;
- (3) To promote the conservation, creation, and expansion of communities that will be developed with adequate public facilities and services;
- (4) To guide the orderly growth and development of the County, while recognizing the needs of agriculture, housing, industry, and business;
- (5) To provide adequate light, air, and privacy;
- (6) To promote the most beneficial relationship between the uses of land and buildings and protect landowners from adverse impacts of adjoining development;
- (7) To protect the County from fire, flood, panic, and other dangers;
- (8) To provide sound, sanitary housing in a suitable and healthy living environment within the economic reach of all County residents;

Section 102. Purposes of the Ordinance

- (9) To encourage economic development activities that provide desirable employment and a broad, protected tax base;
- (10) To prevent the overcrowding of land;
- (11) To lessen the danger and congestion of traffic on the streets, and to insure the continued usefulness of all elements of the transportation system for their planned functions;
- (12) To insure the social and economic stability of all parts of the County;
- (13) To protect against undue noise, and air and water pollution, and to encourage the preservation of stream valleys, steep slopes, lands of natural beauty, dense forests, scenic vistas, and other similar features;
- (14) To provide open space to protect scenic beauty and natural features of the County, as well as to provide recreational space; and
- (15) To protect and conserve the agricultural industry and natural resources.

6565 Ager Road – FEMA Floodplain



Social, Economic, Environmental and Climate Justice

The project targets a community that already is over-burdened with multiple social, economic, environmental and climate stressors.

Heavy traffic, traffic congestion, and unsafe streets.

Elevated levels of traffic-related air pollution, including NO2 and diesel particulates.

An intense urban heat island due to extraordinary forest loss and excessive pavement and buildings.

The Zoning Ordinance Requires a Health Impact Assessment

Sec. 27-284. Referral.

(a) Prior to taking action on a DSP, the Planning Board shall refer the plan to;

The Prince George's County Health Department. The Health Department shall perform a health impact assessment review of the proposed development identifying the potential effects on the health of the population, and the distribution of those effects within the population, including recommendations for design components to increase positive health outcomes and minimize adverse health outcomes on the community.

Forest Loss in Hyattsville and the County

From 2012 to 2018, Hyattsville lost 30 percent of its tree canopy due to development, drought and heat stress.

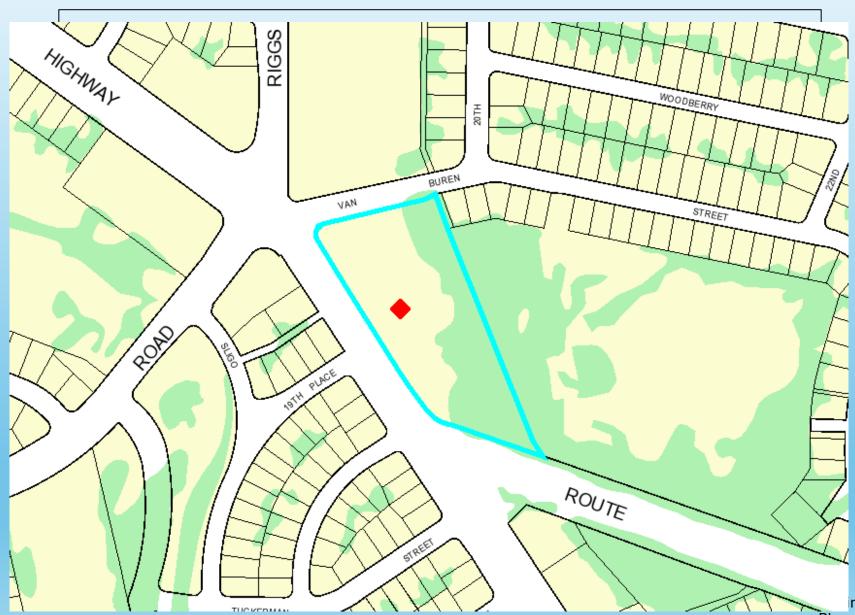
Between 2013 and 2018, Prince George's County lost more acres of tree canopy and forest than any the county in Maryland.... and possibly more than any county in the Chesapeake Bay Watershed.

"According to a recent analysis performed by the Low Impact Development Center, the County lost more than 7,100 acres of tree canopy between 2014 and 2018." (County Climate Action Plan)

A Dangerous, Congested, Hot Five-Point Intersection

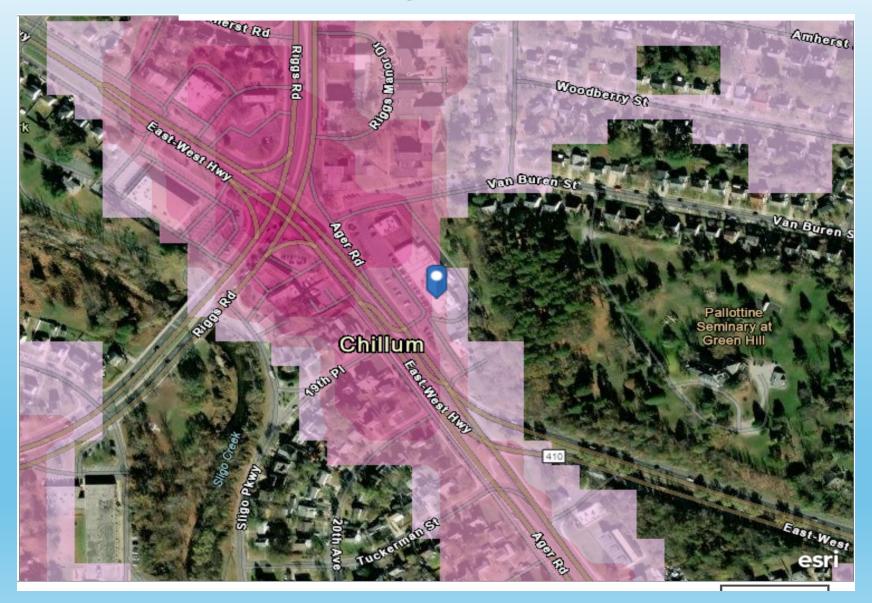


6565 Ager - Tree Canopy



nce George's County Planning Department - 10

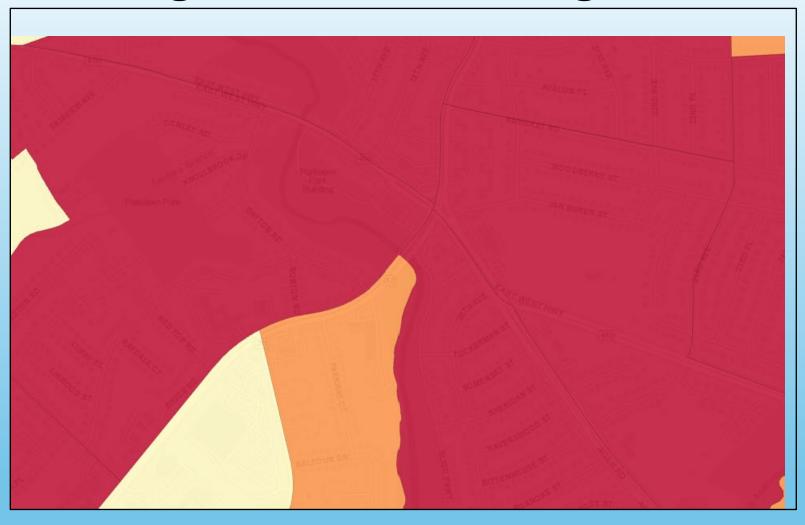
Urban Heat Island Map – Trust for Public Lands



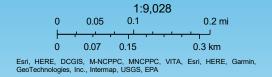
6565 Ager -People of Color - US



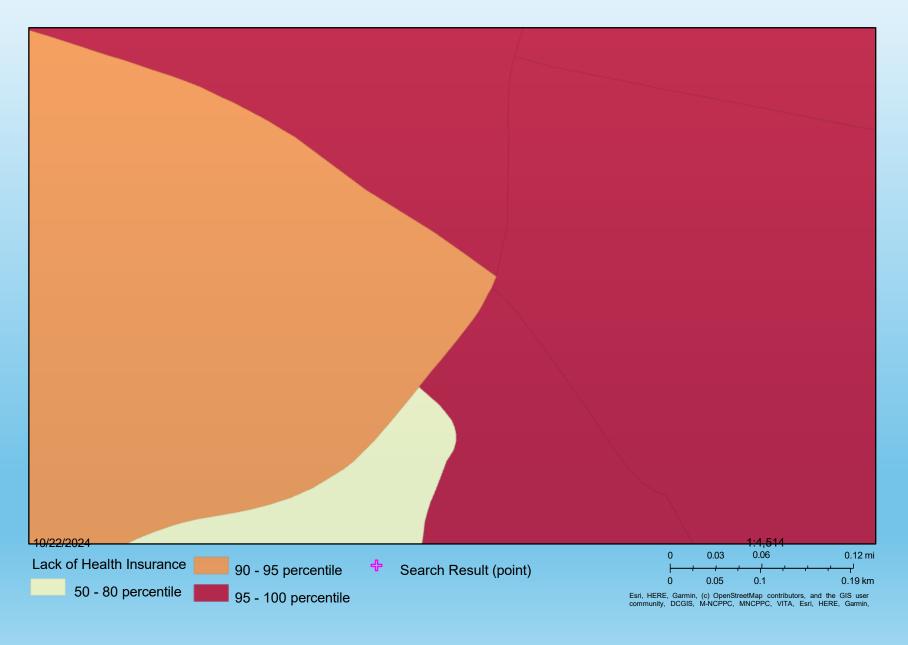
6565 Ager – Less Than High School



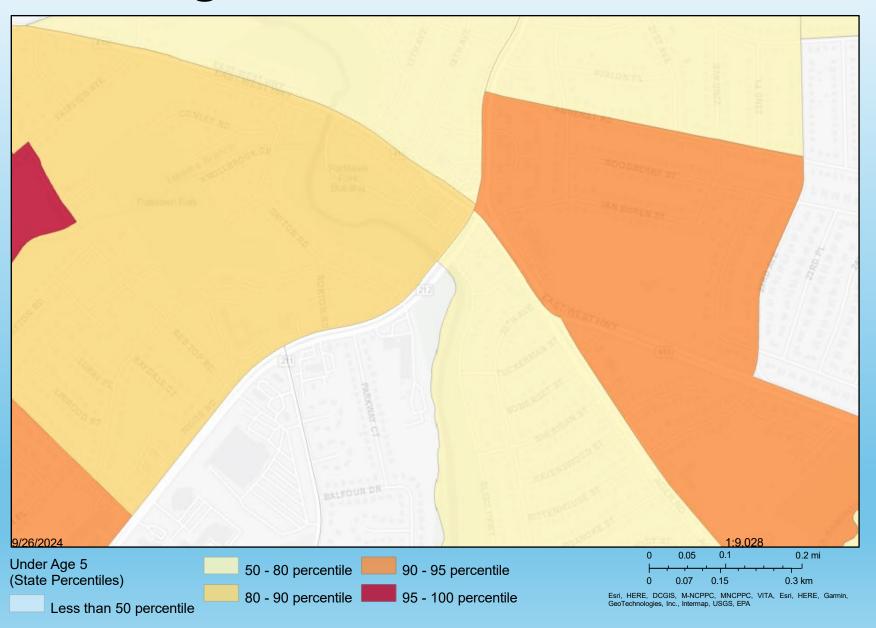




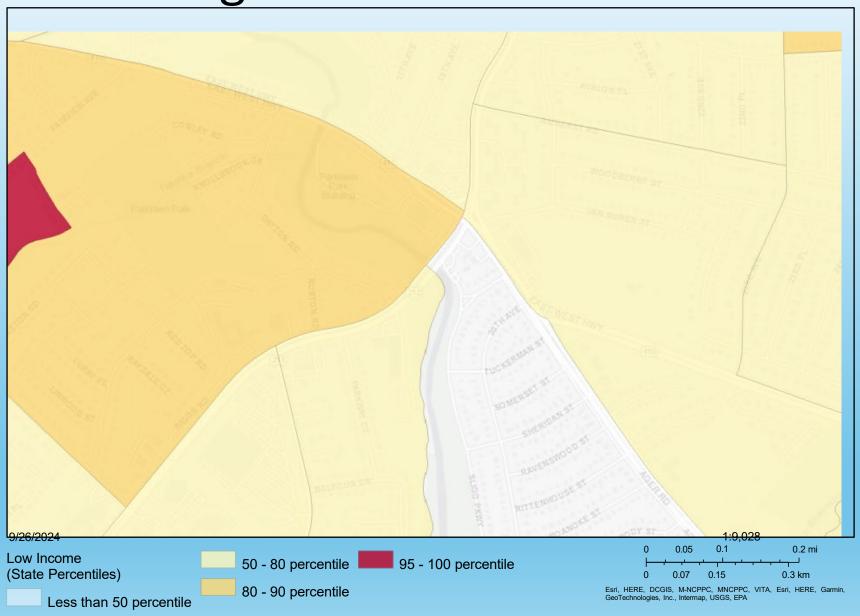
Lack of Health Insurance



6565 Ager – Children Under 5 - State



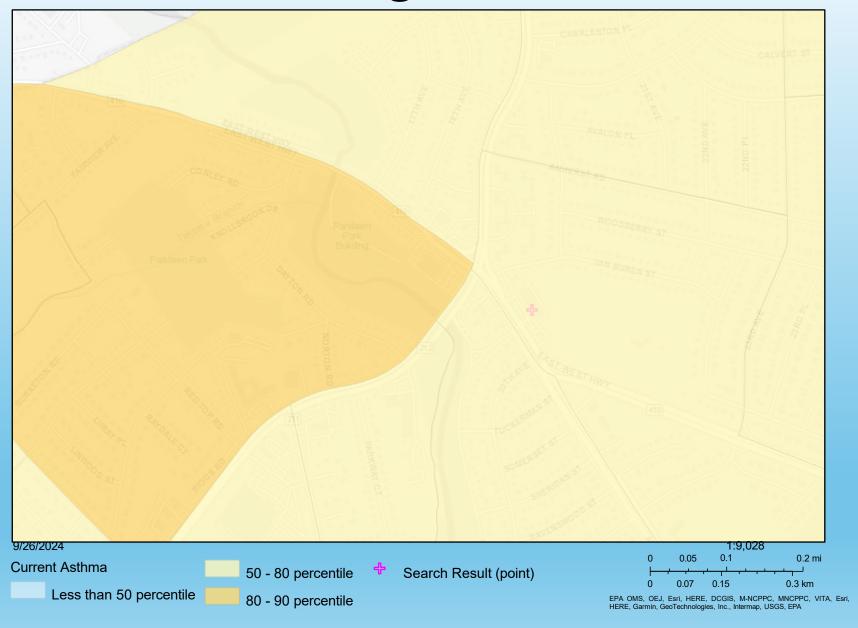
6565 Ager - Low-Income - State



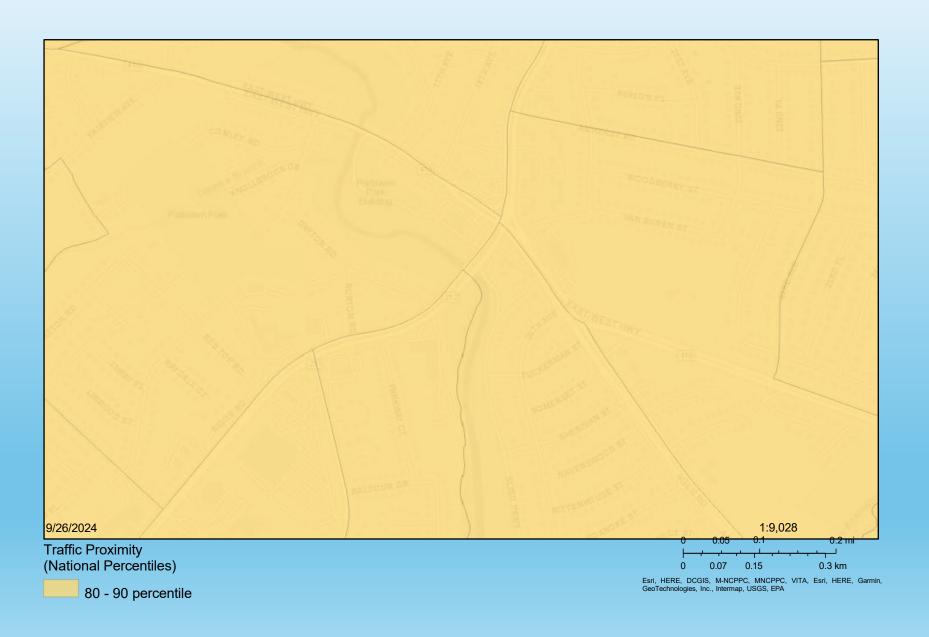
6565 Ager - Limited English - State



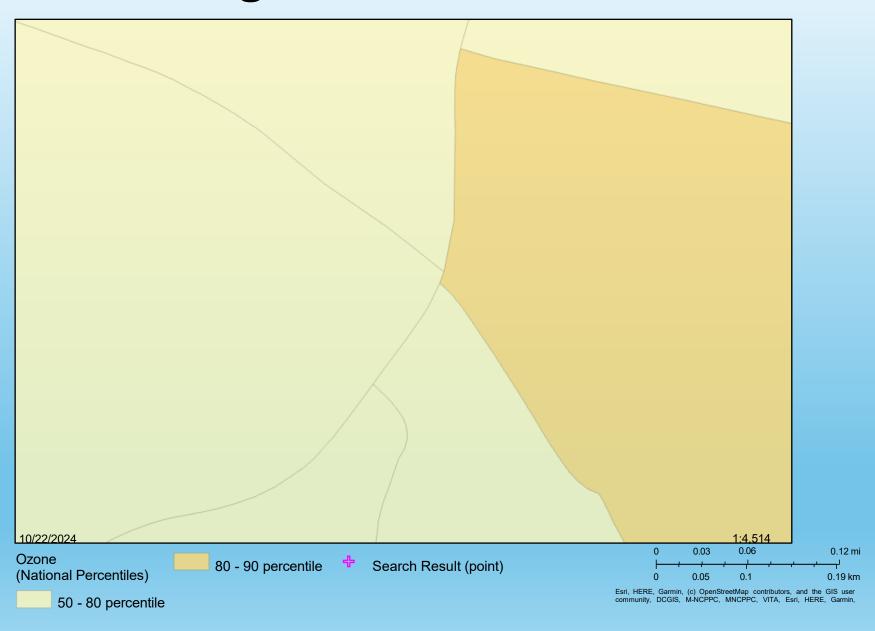
6565 Ager - Asthma



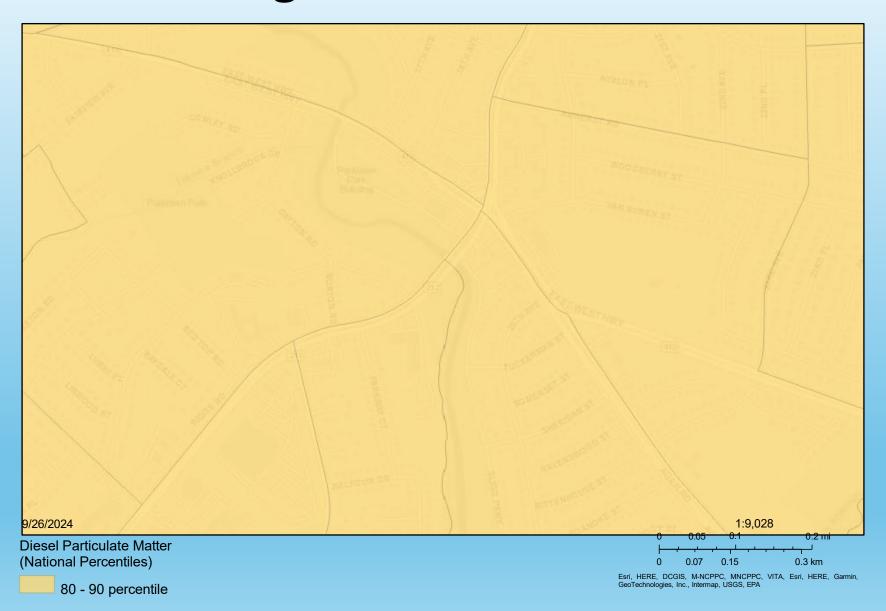
6565 Ager - Traffic Proximity



6565 Ager – Ozone Pollution



6565 Ager - Diesel Particulates



6565 Ager – Nitrogen Dioxide 02



Contributors to Urban Heat Islands

- This temperature differential, which can exceed 10°C, results from several factors:
- loss of vegetation with accompanying loss of evapotranspiration;
- dark surfaces with low albedo (i.e., surface reflectivity), which absorb and then reradiate heat;
- building configurations that trap heat; and
- the concentrated generation of heat from generators, vehicles, and other sources."

(Oke T. 1982. The energetic basis of the urban heat island. Q J Roy Meteorol Soc 108(455):1–24.).

Increasing Tree Canopy and Forest Cover Must Be a Priority

As the effects of climate change worsen and development pressures increase, maintaining, replacing, and even *increasing* the number of trees and tree cover must be prioritized.

Especially within our urban communities, which will struggle with heat island impacts, trees will provide the most cost-effective, long-lasting, and beneficial climate strategy available to reduce carbon and support resilience.

(County Climate Action Plan)

Heat Islands and Disparate Impacts

The historical (1950 – 2010) average daily maximum temperature in Prince George's County has been 66°F. This is projected to increase by about 8°F by 2040 and by 10°F by 2060.

The impacts of this increase in extreme heat will not be felt equally across the County – areas located in urban heat islands will feel the impacts of heat more severely and heat-sensitive residents (e.g., outdoor workers, residents with respiratory illnesses, energy-burdened households) are also disproportionately at risk. (County Climate Action Plan)

Heat Islands and Human Health

In addition to higher annual temperatures, the County is projected to experience more frequent, intense, and longer-lasting heat waves. (page 39)

Projected increases in extreme heat events in Prince George's County are expected to cause 22% more hospitalizations from heart attacks and 75% more hospitalizations from asthma attacks by 2040 compared to 2010. (County Climate Action Plan)

Heat Islands, Human Health, and Tree Loss

In many of the County's underserved neighborhoods, residents lack access to natural areas and green spaces that could offer vital opportunities for physical activity, recreation, and mental, emotional, and social well-being.

These neighborhoods often have a high percentage of impermeable surfaces and a low level of tree canopy coverage. Lack of shade increases risk of heat-related illness, and an excess of paved surfaces increases risk of floods, water-borne illness, and vector-borne diseases. (County Climate Action Plan)

Heat Islands and Human Health

During extreme heat events in Maryland, we already see an 11% overall increase in heart attack hospitalizations, and this figure is even worse for people of color. The increased risk of hospitalization for heart attacks during extreme heat events is 27% for blacks – three times the rate for whites (9%).

During heat waves, residents living in urban heat islands are disproportionately impacted, because temperatures are higher where there is less shade and more pavement. These same neighborhoods tend to have higher rates of poverty, higher proportions of minority populations, and higher rates of homelessness – some of the factors that already contribute to high health risk. (County Climate Action Plan)

Potential Impacts on Impaired Streams

The site is roughly 500 feet from Sligo Creek, a major tributary of the Northwest Branch. Areas downstream of the site are prone to flooding.

Maryland lists the lower Northwest Branch and the Anacostia River as impaired for total suspended solids, biological oxygen demand, phosphorus, nitrogen, heptachlor epoxide, enterococcus, trash, and PCBs.

The lower Northwest Branch may also be impaired for habitat alterations, lack of riparian buffer, chloride, and sulfate.

Additional loadings of those pollutants or degradation of those conditions should be avoided.

Climate Change, Stormwater and Flooding

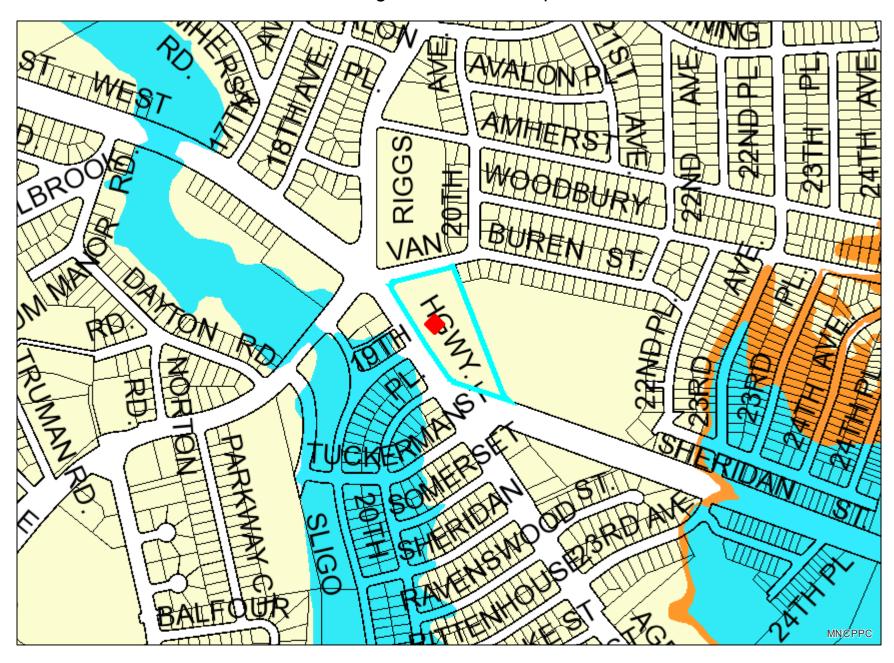
In its 2023 study, *The Precipitation Problem*, the First Street Foundation found that, due climate change, **so-called 100-year storms now occur every 14 years in Baltimore** and every 21 years in Washington, DC, and are likely to become more frequent over the next 30 years.

There is little to no evidence in the published record to demonstrate that applicant's current application and stormwater management plans account for clear evidence that climate change already is bringing more extreme weather – include more frequent, more severe storms – and that this trend will continue and possibly accelerate.

The Maryland Energy Administration is offering grants to support solar parking canopies.

Picture: Solar parking canopies and rooftop solar array at the IKEA Baltimore location.





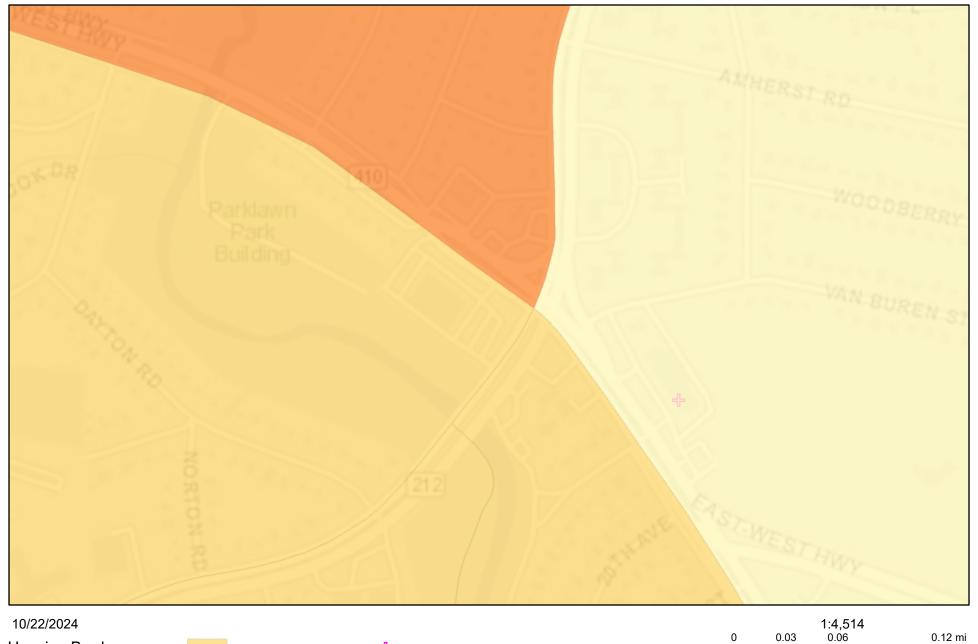


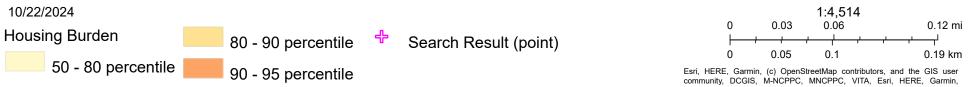


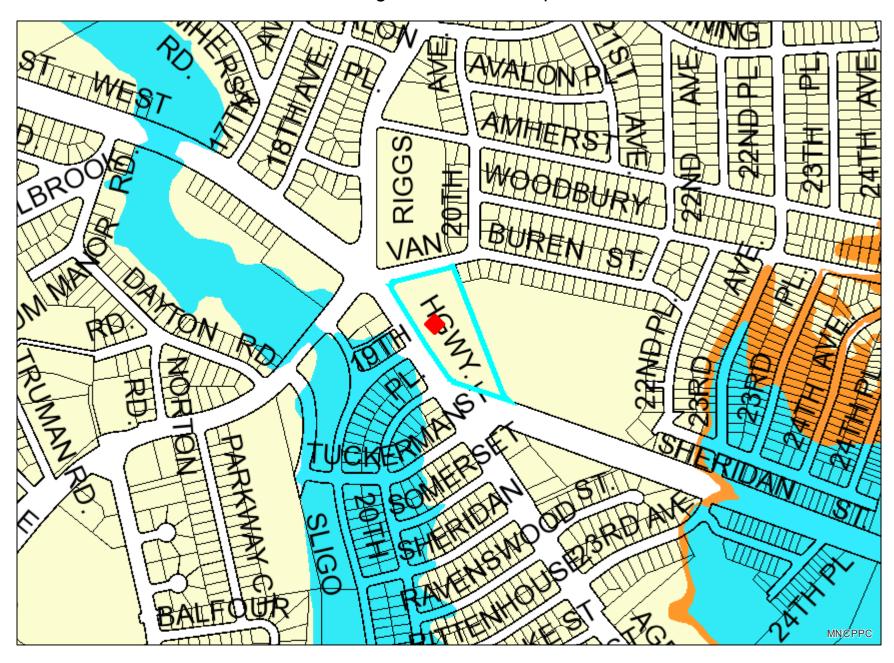




Housing Burden







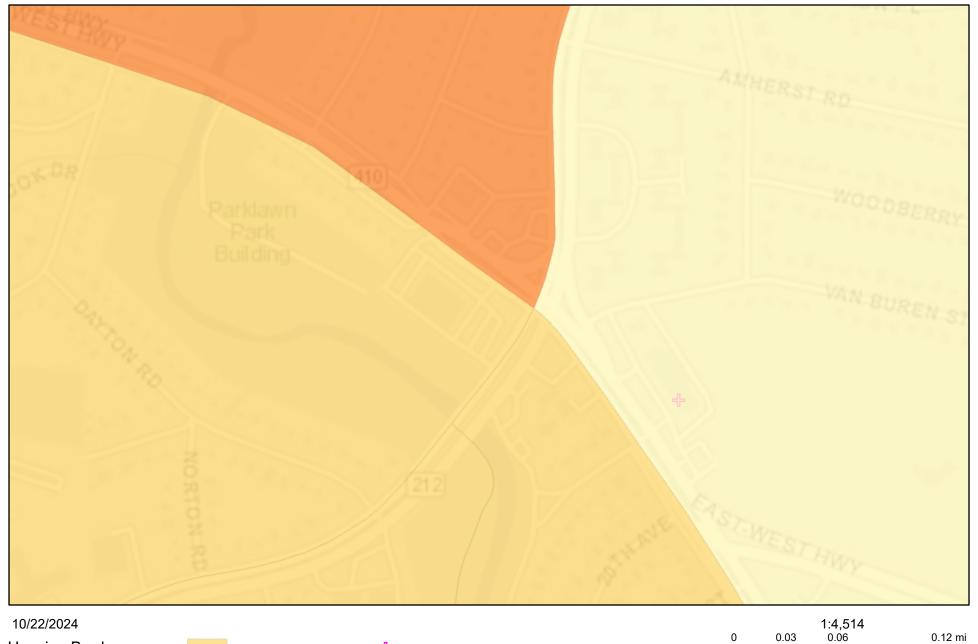


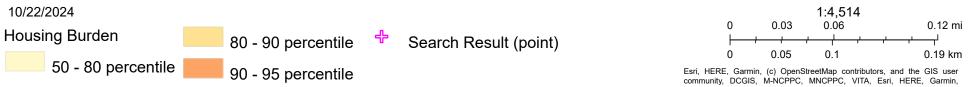




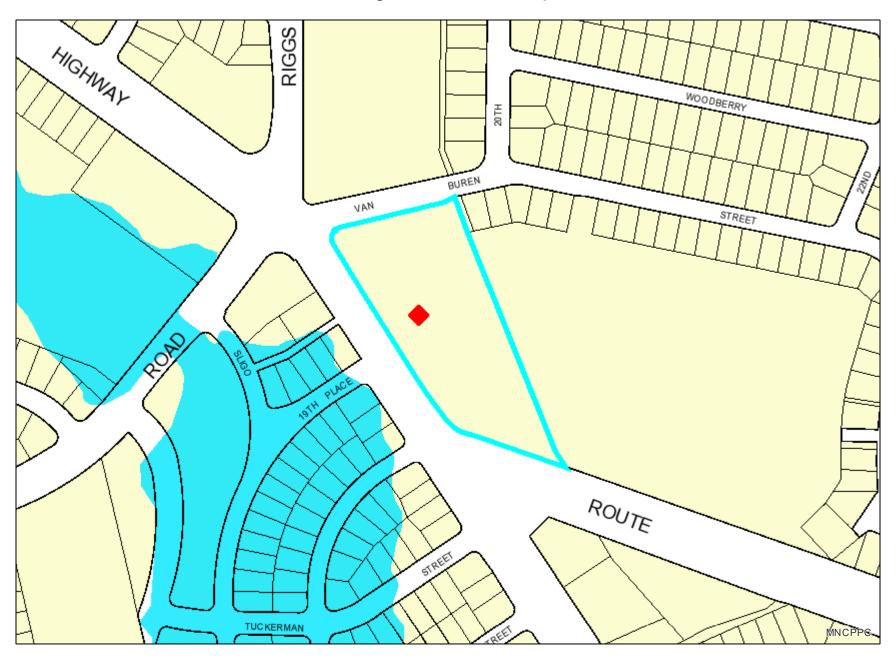


Housing Burden





6565 Ager - FEMA Floodplain



Legend for 6565 Ager - FEMA Floodplain

Property Road Casings Property Environmental Floodplain (FEMA - 2016) 1% Annual Chance Flood Hazard Regulatory Floodway Open Water 0.2% Annual Chance Flood Hazard Area with Reduced Risk Due to Levee

Area of Minimal Flood Hazard

Default

Property Base Fill