

**SUBDIVISION, &  
ZONING AMENDMENT STAFF REPORT****Date: October 6, 2022**

<b><u>NAME</u></b>	Alabama State Port Authority (Casey Pipes, Agent)
<b><u>SUBDIVISION NAME</u></b>	Port of Mobile Logistics Park Subdivision
<b><u>LOCATION</u></b>	1263 Baker Street (South side of Baker Street, 1/5 mile± West of Yeend Street).
<b><u>CITY COUNCIL DISTRICT</u></b>	District 3
<b><u>PRESENT ZONING</u></b>	R-2, Two Family Residential District, and I-2, Heavy Industry District
<b><u>PROPOSED ZONING</u></b>	I-2, Heavy Industry District
<b><u>AREA OF PROPERTY</u></b>	1 Lot / 50.9± Acres
<b><u>CONTEMPLATED USE</u></b>	Subdivision approval to create one (1) legal lot of record; and Rezoning from R-2, Two Family Residential District, and I-2, Heavy Industry District, to I-2, Heavy Industry District. <b>It should be noted, however, that any use permitted in the proposed district would be allowed at this location if the zoning is changed. Furthermore, the Planning Commission may consider zoning classifications other than that sought by the applicant for this property.</b>
<b><u>TIME SCHEDULE FOR DEVELOPMENT</u></b>	Immediate
<b><u>ENGINEERING COMMENTS</u></b>	

**Subdivision:** FINAL PLAT COMMENTS (should be addressed prior to submitting the FINAL PLAT for review and/or signature by the City Engineer):

- A. Provide all of the required information on the SUBDIVISION PLAT (i.e. signature blocks, signatures, certification statements, written legal description, required notes, legend, scale, bearings and distances) that is required by the current Alabama State Board of Licensure for Professional Engineers and Land Surveyors.

- B. The proposed boundary appears to take in part of Lot 1 of Blue Creek Coal Sales, Inc. subdivision.
- C. Label all of the adjacent existing parcels.
- D. Provide and label the monument set or found at each subdivision corner.
- E. What is the line type shown for the south property line (2,336.69' long)? Are these all set monuments or is it chain link fence?
- F. Show and label the existing ROW along the opposite side of Baker Street.
- G. Provide the recording data for the two (2) areas labeled as 'TO BE VACATED'.
- H. Review and revise the written legal description or boundary label for C1.
- I. National Wetlands Inventory (NWI) mapping, as shown on City of Mobile GIS information, indicates that there is potential for wetlands within the property or properties shown on this plat. Show and label the delineated wetlands, or provide a note stating that the wetlands shown on this plat are scaled from the NWI data and have not been delineated.
- J. Provide a note that a 25' riparian buffer may be required, during development, along the edge of anything considered by ADEM to be a water of the state.
- K. Show and label all flood zones. New maps went into effect on June 5, 2020.
- L. Show and label the MFFE (Minimum Finished Floor Elevation) on each lot that contains an AE, V, or X (shaded) flood zone designation. The BFE is 12'.
- M. Show and label each and every Right-Of-Way and easement.
- N. The proposed subdivision receives drainage from a public street and will require a PUBLIC (Dedicated to the City of Mobile) drainage easement; the width and alignment of the easement shall be coordinated with, and approved by, the City Engineer prior to submitting the Plat for signatures.
- O. Add a note that a Land Disturbance permit will be required for any land disturbing activity in accordance with Mobile City Code, Chapter 17, Storm Water Management and Flood Control; the City of Mobile, Alabama Flood Plain Management Plan (1984); and, the Rules For Erosion and Sedimentation Control and Storm Water Runoff Control.
- P. Add a note that the approval of all applicable federal, state, and local agencies (including all storm water runoff, wetland and floodplain requirements) will be required prior to the issuance of a Land Disturbance permit.
- Q. Add a note that sidewalk is required to be constructed, and/or repaired, along the frontage of each lot, or parcel, at time of new development or construction, unless a sidewalk waiver is approved.
- R. Add a note that all existing and proposed detention facilities, common areas, and wetlands shall be the responsibility of the Property Owner(s), and not the responsibility of the City of Mobile.
- S. Add a note that all easements shall remain in effect until vacated through the proper Vacation process.
- T. Email a pdf copy of the FINAL SUBDIVISION PLAT and LETTER OF DECISION to the Permitting Engineering Dept. for review at [land.disturbance@cityofmobile.org](mailto:land.disturbance@cityofmobile.org) prior to obtaining any signatures. No signatures are required on the drawing.

### **Rezoning:**

- 1. Any work performed in the existing ROW (right-of-way) such as driveways, sidewalks, utility connections, grading, drainage, irrigation, or landscaping will require a ROW permit from the City of Mobile Engineering Permitting Department (251-208-6070) and must comply with the City of Mobile Right-of-Way Construction and Administration Ordinance (Mobile City Code, Chapter 57, Article VIII).

2. A Land Disturbance Permit application shall be submitted for any proposed land disturbing activity with the property. A complete set of construction plans including, but not limited to, drainage, utilities, grading, storm water detention systems and paving will need to be included with the Land Disturbance permit. This Permit must be submitted, approved, and issued prior to beginning any of the construction work.
3. Any and all proposed land disturbing activity within the property will need to be submitted for review and be in conformance with Mobile City Code, Chapter 17, Storm Water Management and Flood Control; the City of Mobile, Alabama Flood Plain Management Plan (1984); and, the Rules For Erosion and Sedimentation Control and Storm Water Runoff Control.
4. A 25' riparian buffer may be required, during development, along the edge of anything considered by ADEM to be a water of the state.
5. Any existing or proposed detention facility shall be maintained as it was constructed and approved. The Land Disturbance Permit application for any proposed construction includes a requirement of a Maintenance and Inspection Plan (signed and notarized by the Owner) for the detention facility. This Plan shall run with the land and be recorded in the County Probate Office prior to the Engineering Department issuing their approval for a Final Certificate of Occupancy.
6. The approval of all applicable federal, state, and local agencies (including all storm water runoff, wetland and floodplain requirements) will be required prior to the issuance of a Land Disturbance permit. The Owner/Developer is responsible for acquiring all of the necessary permits and approvals.
7. The proposed development must comply with all Engineering Department design requirements and Policy Letters.

## **TRAFFIC ENGINEERING**

### **COMMENTS**

A traffic impact study (TIS) has not been submitted or reviewed by Traffic Engineering. Potential access changes to the existing ICTF Facility as illustrated in the conceptual site plan have not been fully vetted as it appears to shift the public roadway of Baker Street of the public right-of-way. [preceding need not be part of subdivision note] Driveway number, size, location, and design to be approved by Traffic Engineering and conform to AASHTO standards. Any required on-site parking, including ADA handicap spaces, should meet the minimum standards as defined in Section 64-6 of the City's Zoning Ordinance.

## **URBAN FORESTRY**

### **COMMENTS**

Property to be developed in compliance with state and local laws that pertain to tree preservation and protection on both city and private properties [Act 929 of the 1961 Regular Session of the Alabama Legislature (Acts 1961, p. 1487), as amended, and City Code Chapters 57 and 65]. Private removal of trees in the right-of-way will require approval of the Mobile Tree Commission. Removal of heritage trees from undeveloped residential sites, developed residential sites in historic districts, and all commercial sites will require a tree removal permit.

## **FIRE DEPARTMENT**

### **COMMENTS**

All projects within the City Limits of Mobile shall comply with the requirements of the City of Mobile Fire Code Ordinance (2012 International Fire Code). Fire apparatus access is required to be within 150' of all commercial and residential buildings. A fire hydrant is required to be within 400' of non-sprinkled commercial buildings and 600' of sprinkled commercial buildings.

## **REMARKS**

The applicant is requesting Subdivision approval to create one (1) legal lot of record from multiple legal lots of record, multiple metes-and bounds parcels, and vacated public rights-of-way, and Rezoning from R-2, Two-Family Residential District, and I-2, Heavy Industry District.

The site has been given a Heavy Industry (HI) land use designation, per the Future Land Use Plan and Map, adopted on May 18, 2017 by the Planning Commission. The Future Land Use Plan and Map complements and provides additional detail to the Development Framework Maps in the Map for Mobile, adopted by the Planning Commission at its November 5, 2015 meeting.

This designation applies to larger parcels primarily devoted to high-impact industrial activity which is preferably removed from residential and commercial uses. Light industry, industrial business or heavy commercial lands may separate heavy industry from other land uses.

Heavy industrial areas include collection, treatment, and manufacturing processes which use raw materials, are distinguished by the presence of noise, vibration, and/or odors, and benefit from easy access to a multimodal freight transportation network. Certain types of heavy industry are characterized by low building coverage and activities that rely on large areas of outdoor storage of raw material stockpiles and/or waste-product disposal areas, storage tanks, pipelines, and transportation yards to handle the transfer of heavy materials. The outdoor storage areas should be screened as much as possible by the nature of the stored materials.

Land designated as HI may be underdeveloped due to the presence of wetlands on portions of the parcel. In these cases, the wetlands may serve to buffer surrounding uses from the potential impacts of the heavy industrial use. Undeveloped areas of HI parcels that have tree cover may be used as buffering between the heavy industrial use and other uses. Where buffers do not exist naturally, they should be provided as spelled out in the zoning and subdivision regulations. Open areas reserved for dredge disposal are also designated as HI and may contain wetlands.

In Mobile, port terminal facilities, docks, shipyards, drydocks, etc., are mostly owned by the State of Alabama. Although not subject to local zoning, these facilities are shown as heavy industrial uses in the FLUM.

It should be noted that the Future Land Use Plan and Map components of the Map for Mobile Plan are meant to serve as a general guide, not a detailed lot and district plan. In many cases the designation on the new Future Land Use Map may match the existing use of land, but in others the designated land use may differ from what is on the ground today. As such, the Future Land Use Plan and Map allows the Planning Commission and City Council to consider individual cases based on additional information such as the classification request, the surrounding development, the timing of the request, and the appropriateness and compatibility of the proposed use and, where applicable, the zoning classification.

The applicant submitted the following concerning the Rezoning:

### ***PROJECT DESCRIPTION .***

*The Alabama State Port Authority (the “Port”) previously acquired multiple parcels of property so it could expand its facilities and aid in the movement of cargo and shipping containers into and out of the Container Port and the other Port facilities. The subject*

*property will be the site of a logistics park and distribution facility. This property is adjacent to the existing Intermodal Container Transfer Facility (ICTF). Rather than building this logistics and distribution facility itself (which would not require rezoning due to the Port's exemption from the City's zoning ordinances), the Port has decided to enter into a lease agreement with a private company to design, build, finance, operate and maintain (DBFOM) the facility for a term of years. After a public "Request for Qualifications" period, the Port selected Port City Logistics to be its tenant on this site. Casey Pipes, the applicant, is an attorney representing Port City Logistics.*

*The logistics park project will involve the construction of internal, private driveways, truck and trailer parking areas, and a building that will allow for cross-docking and trans-loading of cargo that is out-bound from the Port. A conceptual site plan is provided for general illustration purposes.*

#### **PLAN CONSISTENCY STATEMENT.**

*This application is 100% consistent with the City's Comprehensive Plan, the City's Future Land Use Plan, and the City's Future Land Use Map. The "Development Framework Map" for the Comprehensive Plan (page 33) identifies this property as being "Industrial". The Future Land Use Map calls for this property to be "Heavy Industry (HI)". The Future Land Use Plan's "matrix" states that the requested zoning district, Heavy Industry I-2, is "directly related" with the "Heavy Industry (HI)" Future Land Use Map district. Over half of this property is already zoned I-2, and the other part is B-2 from a subdivision that was discontinued years ago.*

*This application seeks to rezone the subject property to the exact zoning district classification that the City's plans all state is the most appropriate zoning classification for the property. Granting the application is consistent with all the City's plans. Denying the application is inconsistent with each of the City's plans.*

#### **ZONING STATEMENT**

*The subject property will be a mix of I-2 and R-2 following a resubdivision that will create one large lot from many smaller ones. The zoning change will cure the split zoning that will result.*

*The R-2 area is the site of the former Bayside Nurseries subdivision from 1895. The homes in this subdivision have all long since gone away. The City's streets in the platted subdivision were vacated by the City Council over ten years ago (see, e.g., Resolution 47-280 from July of 2012; Book 6919, Pages 767 et seq, Mobile Probate Records).*

*Even if R-2 had been appropriate at some point in the past, R-2 is manifestly erroneous for this property today due to a change in conditions. It is surrounded by heavy industrial uses on all sides, and it is located between I-10 and an active rail road track on the North, and more active rail road tracks and the ICTF facility on the South. To the extent this site was ever properly zoned R-2, there has been a substantial change in conditions which no longer make R-2 appropriate. This is a heavy industrial area, and it will remain that way.*

*Further, there is an increased need for heavy industrial sites in close proximity to the Container Port and the ICTF facility. This need is evidenced by the Port's acquisition of the subject property and its desire to create a logistics park on this site.*

*Rezoning this property to industrial will not have any adverse impact on the surrounding land uses or properties.*

The subject site consists of lots of Bayside Nurseries Subdivision, various metes-and-bounds parcels, and vacated public streets. The Bayside Nurseries Subdivision was originally assigned the R-2 classification when in residential use, and the adjoining properties were assigned the I-2 classification. The subdivision properties were eventually acquired by the Alabama State Docks, and the dwellings were removed. Surrounding properties were also eventually acquired by the Alabama State Docks. The Alabama State Port Authority now proposes to have the site developed and operated by a private company (which would not be exempt from the Zoning Ordinance) as a logistics and distribution facility in support of the State's Intermodal Container Transfer Facility, thus the site must be made into one legal lot of record. A split zoning situation would then be created within the one lot, necessitating rezoning to the appropriate I-2 classification.

Subdivision review examines the site with regard to promoting orderly development, protecting general health, safety and welfare, and ensuring that development is correlated with adjacent developments and public utilities and services, and to ensure that the subdivision meets the minimum standards set forth in the Subdivision Regulations for lot size, road frontage, lot configuration, etc.

The site fronts Baker Street and Bay Street, both minor streets. Baker Street is curbed and guttered and would require a 50-foot right-of-way. The preliminary plat indicates a varying right-of-way width along Baker Street. Therefore, if approved, the plat should be revised to indicate the current right-of-way width along Baker Street, and if less than 50 feet, dedication should be required to provide 25 feet from the centerline. A portion of Bay Street passes through the Northwest corner of the site and is indicated to be vacated. Therefore, if approved, the vacation of Bay Street should be completed prior to signing the Final Plat. The preliminary plat also indicates an Illinois Central Gulf Railroad right-of-way within the Southern portion of the site as to be vacated. This vacation should also be completed prior to signing the Final Plat, if approved.

The plat does not indicate a minimum building setback line along Baker Street. Therefore, the plat should be revised to indicate at least a 25-foot minimum building setback line along Baker Street, as measured from any required frontage dedication. The lot size is labeled on the preliminary plat in both square feet and acres, and this should be retained on the Final Plat, adjusted for any required dedication, or a table should be furnished on the Final Plat providing the same information.

As per the Traffic Engineering comments, driveway number, size, location, and design are to be approved by Traffic Engineering and conform to AASHTO standards. Any required on-site parking, including ADA handicap spaces, should meet the minimum standards as defined in Section 64-6 of the City's Zoning Ordinance. A note should be required on the Final Plat stating these comments.

Section 64-9. of the Zoning Ordinance states that the intent of the Ordinance and corresponding Zoning Map is to carry out the comprehensive planning objective of sound, stable and desirable development. While changes to the Ordinance are anticipated as the city grows, the established public policy is to amend the ordinance only when one or more of the following conditions prevail:

1) there is a manifest error in the Ordinance; 2) changing conditions in a particular area make a change in the Ordinance necessary and desirable; 3) there is a need to increase the number of sites available to business or industry; or 4) the subdivision of land into building sites makes reclassification of the land necessary and desirable.

As the subject site is indicated as a Heavy Industry (HI) land use designation, per the Future Land Use Plan and Map, the proposed use would be in keeping with that classification. Additionally, there have been changing conditions within this area which make a change in the Ordinance necessary and desirable based upon the removal of the homes and the development of the Intermodal Container Transfer Facility site adjoining to the South. Furthermore, the subdivision of land into one building site makes reclassification of the land necessary and desirable to eliminate split zoning within the one proposed lot.

## **RECOMMENDATION**

**Subdivision:** Based upon the preceding, this application is recommended for Tentative Approval, subject to the following conditions:

- 1) revision of the plat to indicate the current right-of-way width along Baker Street, and if less than 50 feet, dedication to provide 25 feet from the centerline;
- 2) revision of the plat to indicate at least a 25-foot minimum building setback line along Baker Street, as measured from any required frontage dedication;
- 3) vacation of Bay Street prior to signing the Final Plat;
- 4) vacation of the Illinois Central Gulf Railroad right-of-way prior to signing the Final Plat;
- 5) retention of the lot size label in both square feet and acres, adjusted for any required street frontage dedication, or the furnishing of a table on the Final Plat providing the same information;
- 6) compliance with the Engineering comments: *(FINAL PLAT COMMENTS (should be addressed prior to submitting the FINAL PLAT for review and/or signature by the City Engineer): A. Provide all of the required information on the SUBDIVISION PLAT (i.e. signature blocks, signatures, certification statements, written legal description, required notes, legend, scale, bearings and distances) that is required by the current Alabama State Board of Licensure for Professional Engineers and Land Surveyors. B. The proposed boundary appears to take in part of Lot 1 of Blue Creek Coal Sales, Inc. subdivision. C. Label all of the adjacent existing parcels. D. Provide and label the monument set or found at each subdivision corner. E. What is the line type shown for the south property line (2,336.69' long)? Are these all set monuments or is it chain link fence? F. Show and label the existing ROW along the opposite side of Baker Street. G. Provide the recording data for the two (2) areas labeled as 'TO BE VACATED'. H. Review and revise the written legal description or boundary label for C1. I. National Wetlands Inventory (NWI) mapping, as shown on City of Mobile GIS information, indicates that there is potential for wetlands within the property or properties shown on this plat. Show and label the delineated wetlands, or provide a note stating that the wetlands shown on this plat are scaled from the NWI data and have not been delineated. J. Provide a note that a 25' riparian buffer may be required, during development, along the edge of anything considered by ADEM to be a water of the state. K. Show and label all flood zones. New maps went into effect on June 5, 2020. L. Show and label the MFFE (Minimum Finished Floor Elevation) on each lot that contains an AE, V, or X (shaded) flood zone designation. The BFE is 12'. M. Show and label each and every Right-Of-Way and easement. N. The*

- proposed subdivision receives drainage from a public street and will require a PUBLIC (Dedicated to the City of Mobile) drainage easement; the width and alignment of the easement shall be coordinated with, and approved by, the City Engineer prior to submitting the Plat for signatures. O. Add a note that a Land Disturbance permit will be required for any land disturbing activity in accordance with Mobile City Code, Chapter 17, Storm Water Management and Flood Control; the City of Mobile, Alabama Flood Plain Management Plan (1984); and, the Rules For Erosion and Sedimentation Control and Storm Water Runoff Control. P. Add a note that the approval of all applicable federal, state, and local agencies (including all storm water runoff, wetland and floodplain requirements) will be required prior to the issuance of a Land Disturbance permit. Q. Add a note that sidewalk is required to be constructed, and/or repaired, along the frontage of each lot, or parcel, at time of new development or construction, unless a sidewalk waiver is approved. R. Add a note that all existing and proposed detention facilities, common areas, and wetlands shall be the responsibility of the Property Owner(s), and not the responsibility of the City of Mobile. S. Add a note that all easements shall remain in effect until vacated through the proper Vacation process. T. Email a pdf copy of the FINAL SUBDIVISION PLAT and LETTER OF DECISION to the Permitting Engineering Dept. for review at [land.disturbance@cityofmobile.org](mailto:land.disturbance@cityofmobile.org) prior to obtaining any signatures. No signatures are required on the drawing.);*
- 7) *placement of a note on the Final Plat stating the Traffic Engineering comments: (Driveway number, size, location, and design to be approved by Traffic Engineering and conform to AASHTO standards. Any required on-site parking, including ADA handicap spaces, should meet the minimum standards as defined in Section 64-6 of the City's Zoning Ordinance.);*
  - 8) *compliance with the Urban Forestry comments: (Property to be developed in compliance with state and local laws that pertain to tree preservation and protection on both city and private properties [Act 929 of the 1961 Regular Session of the Alabama Legislature (Acts 1961, p. 1487), as amended, and City Code Chapters 57 and 65]. Private removal of trees in the right-of-way will require approval of the Mobile Tree Commission. Removal of heritage trees from undeveloped residential sites, developed residential sites in historic districts, and all commercial sites will require a tree removal permit.);*
  - 9) *compliance with the Fire Department comments: (All projects within the City Limits of Mobile shall comply with the requirements of the City of Mobile Fire Code Ordinance (2012 International Fire Code). Fire apparatus access is required to be within 150' of all commercial and residential buildings. A fire hydrant is required to be within 400' of non-sprinkled commercial buildings and 600' of sprinkled commercial buildings.); and,*
  - 10) *completion of the Rezoning process prior signing the Final Plat.*

**Rezoning:** Based on the preceding, this application is recommended for Approval for the following reasons:

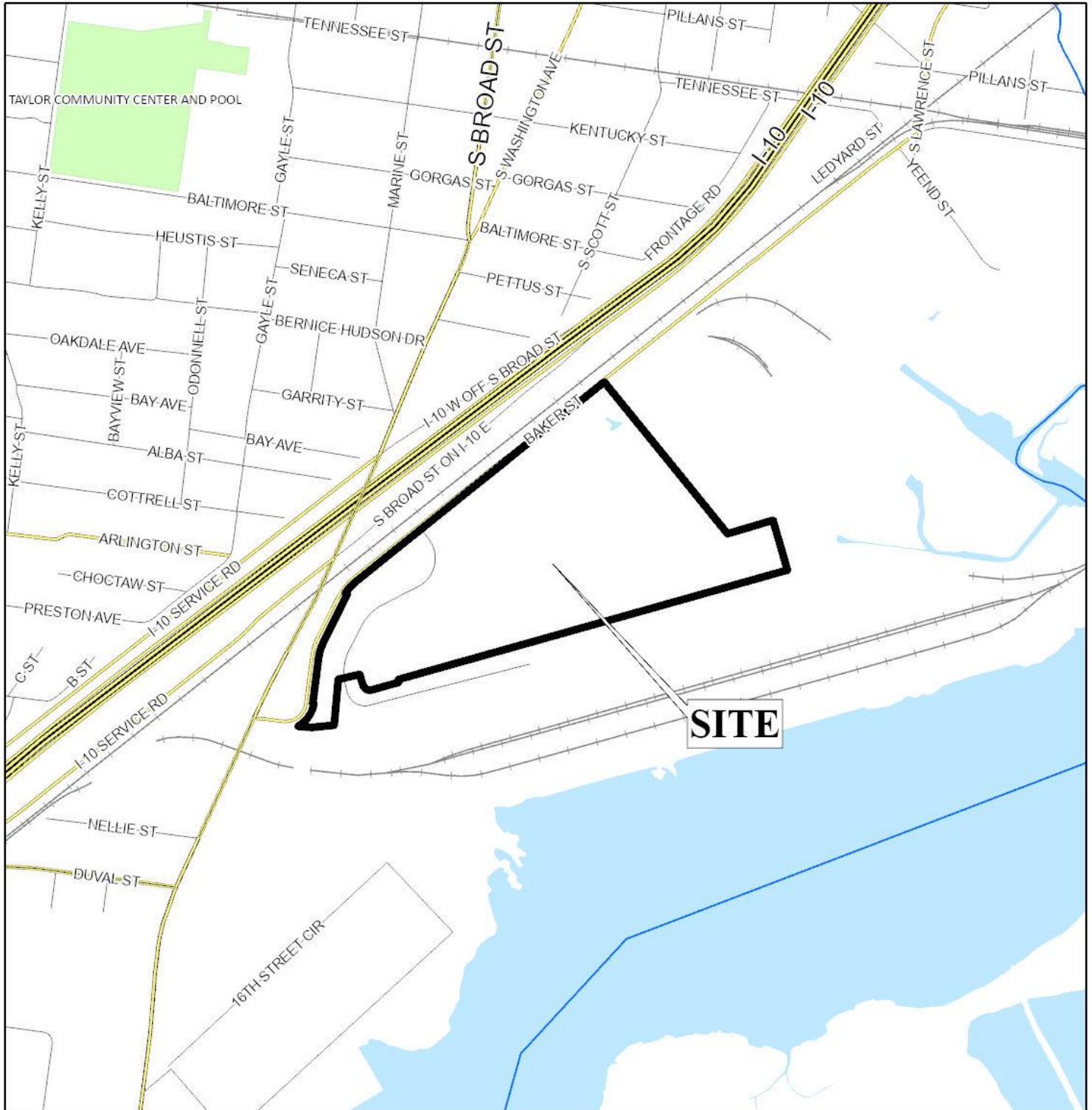
- a) *changing conditions in a particular area make a change in the Ordinance necessary and desirable; and,*
- b) *the subdivision of land into building sites makes reclassification of the land necessary and desirable.*

The approval should be subject to the following conditions:

- 1) *completion of the Subdivision process; and*
- 2) *full compliance with all municipal codes and ordinances.*



# LOCATOR MAP



APPLICATION NUMBER 7 DATE October 6, 2022

APPLICANT Port Of Mobile Logistics Park Subdivision

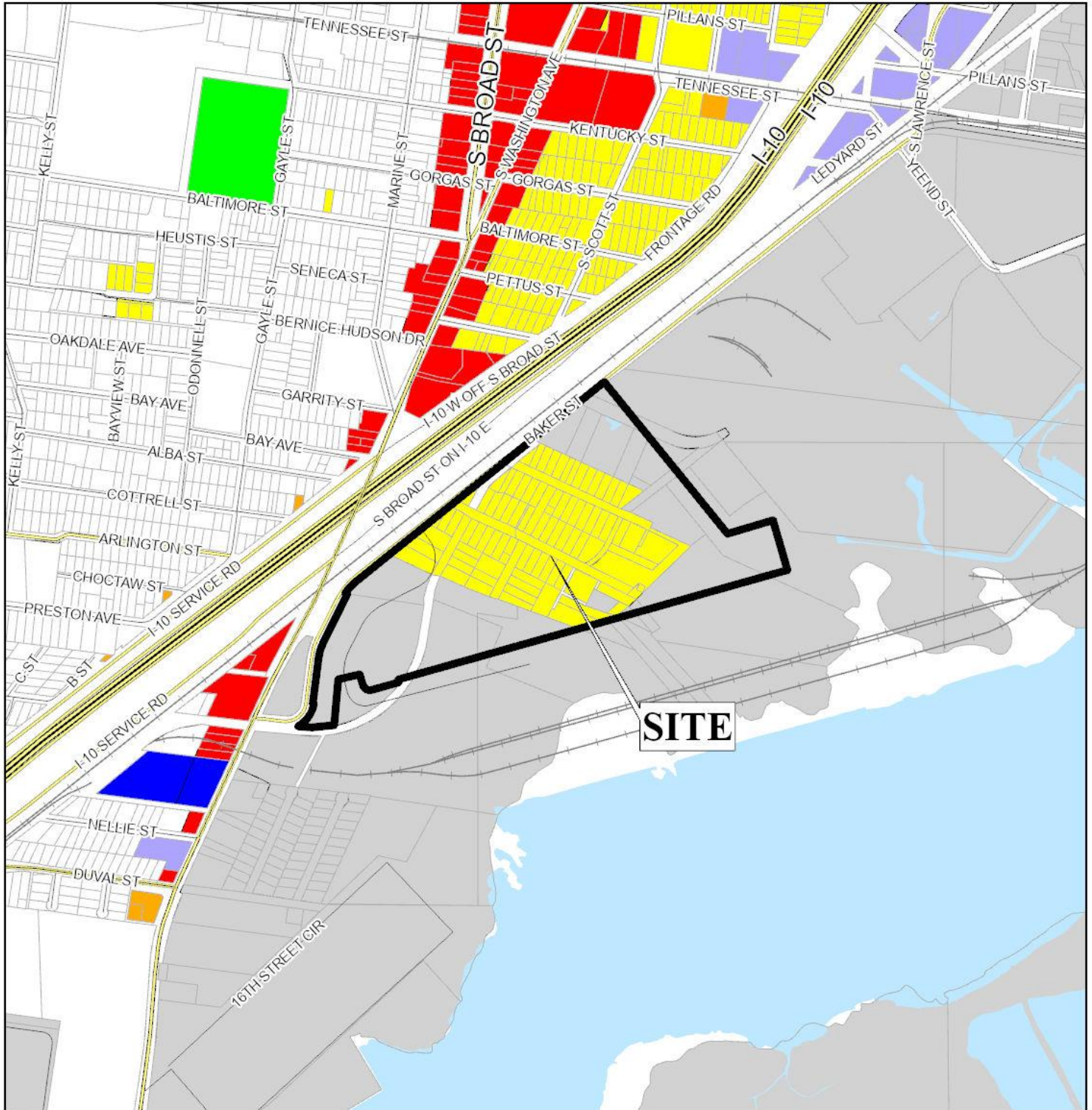
REQUEST Subdivision, Rezoning From R-2 And I-2 To I-2

N



NTS

# LOCATOR ZONING MAP



APPLICATION NUMBER 7 DATE October 6, 2022

APPLICANT Port Of Mobile Logistics Park Subdivision

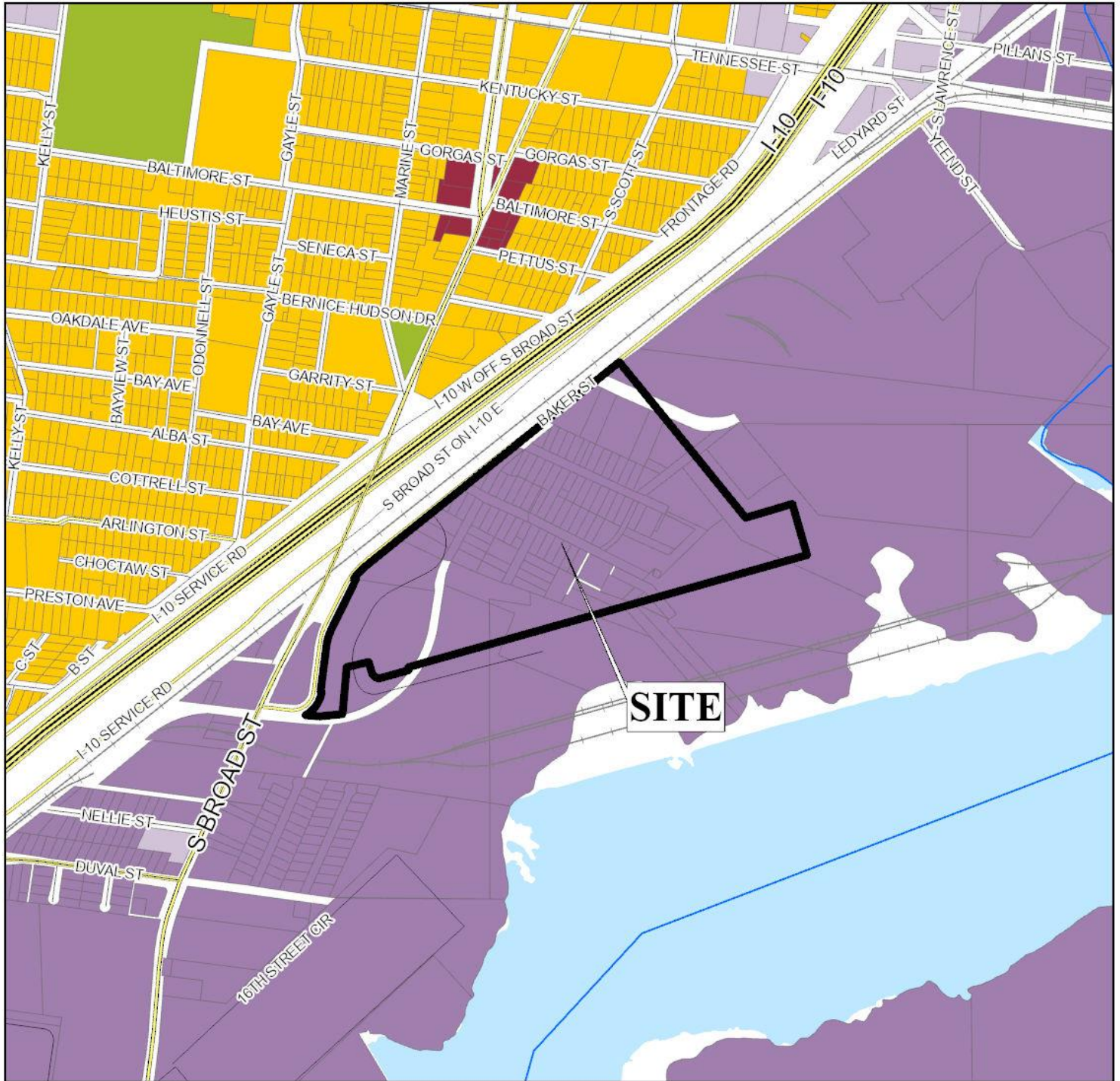
REQUEST Subdivision, Rezoning From R-2 And I-2 To I-2



NTS



# FLUM LOCATOR MAP



APPLICATION NUMBER 7 DATE October 6, 2022

APPLICANT Port Of Mobile Logistics Park Subdivision

REQUEST Subdivision, Rezoning From R-2 And I-2 To I-2

Layer2

Low Density Residential  
Mixed Density Residential

Downtown  
District Center  
Neighborhood Center - Traditional  
Neighborhood Center - Suburban

Traditional Corridor  
Mixed Commercial Corridor  
Downtown Waterfront  
Light Industry

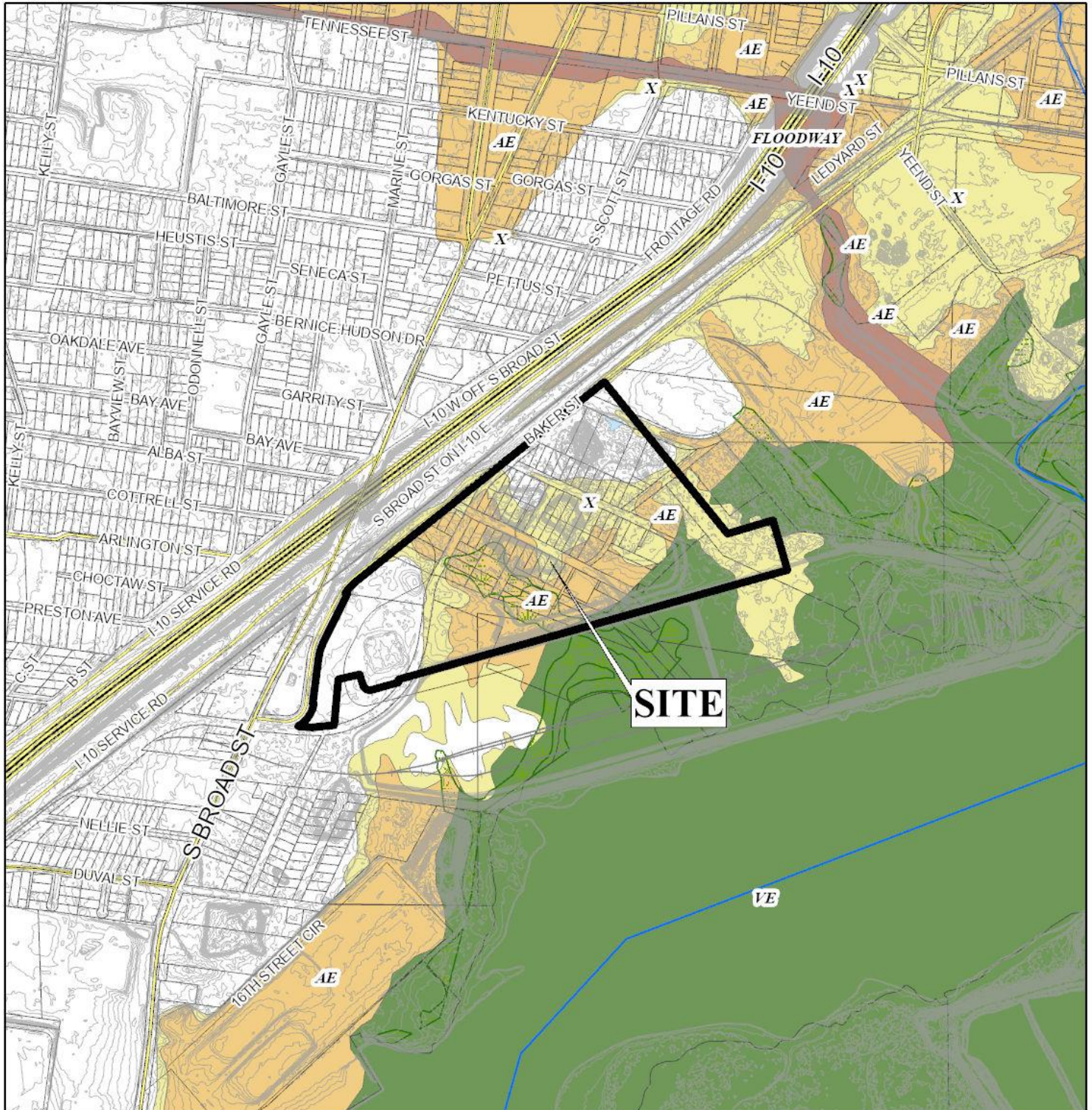
Heavy Industry  
Institutional  
Parks & Open Space  
Water Dependent



NTS



# ENVIRONMENTAL LOCATOR MAP



APPLICATION NUMBER 7 DATE October 6, 2022

APPLICANT Port Of Mobile Logistics Park Subdivision

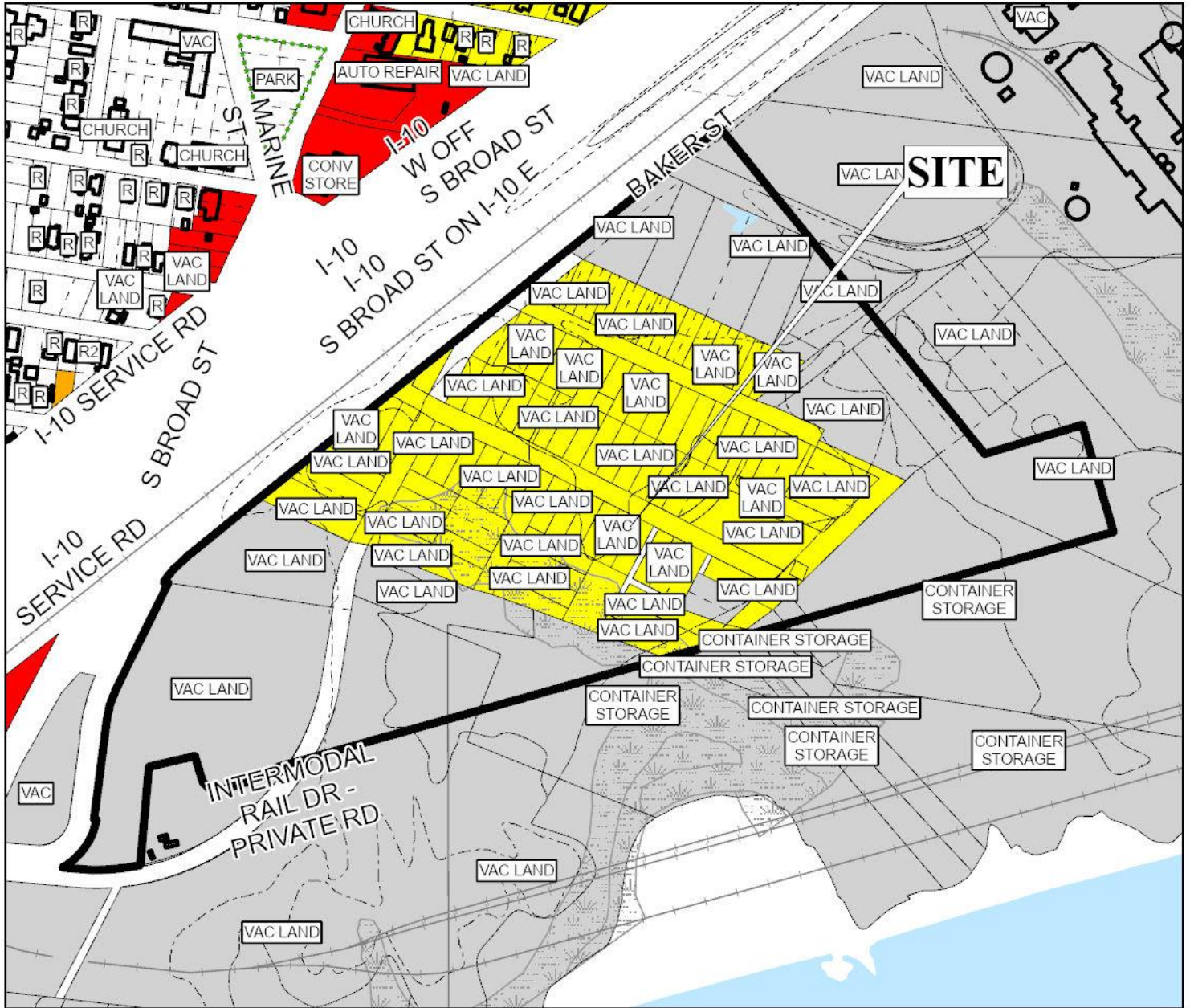
REQUEST Subdivision, Rezoning From R-2 And I-2 To I-2



NTS



## PLANNING COMMISSION VICINITY MAP - EXISTING ZONING



















The site is surrounded by a container storage yard to the south. Residential units lie to the north of the site.









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APPLICANT Port Of Mobile Logistics Park Subdivision

REQUEST Subdivision, Rezoning From R-2 And I-2 To I-2

 R-A
  R-3
  T-B
  B-2
  B-5
  MUN
  SD-WH
  T5.1

 R-1
  R-B
  B-1
  B-3
  I-1
  OPEN
  T3
  T5.2

 R-2
  H-B
  LB-2
  B-4
  I-2
  SD
  T4
  T6



NTS



# PLANNING COMMISSION VICINITY MAP - EXISTING AERIAL



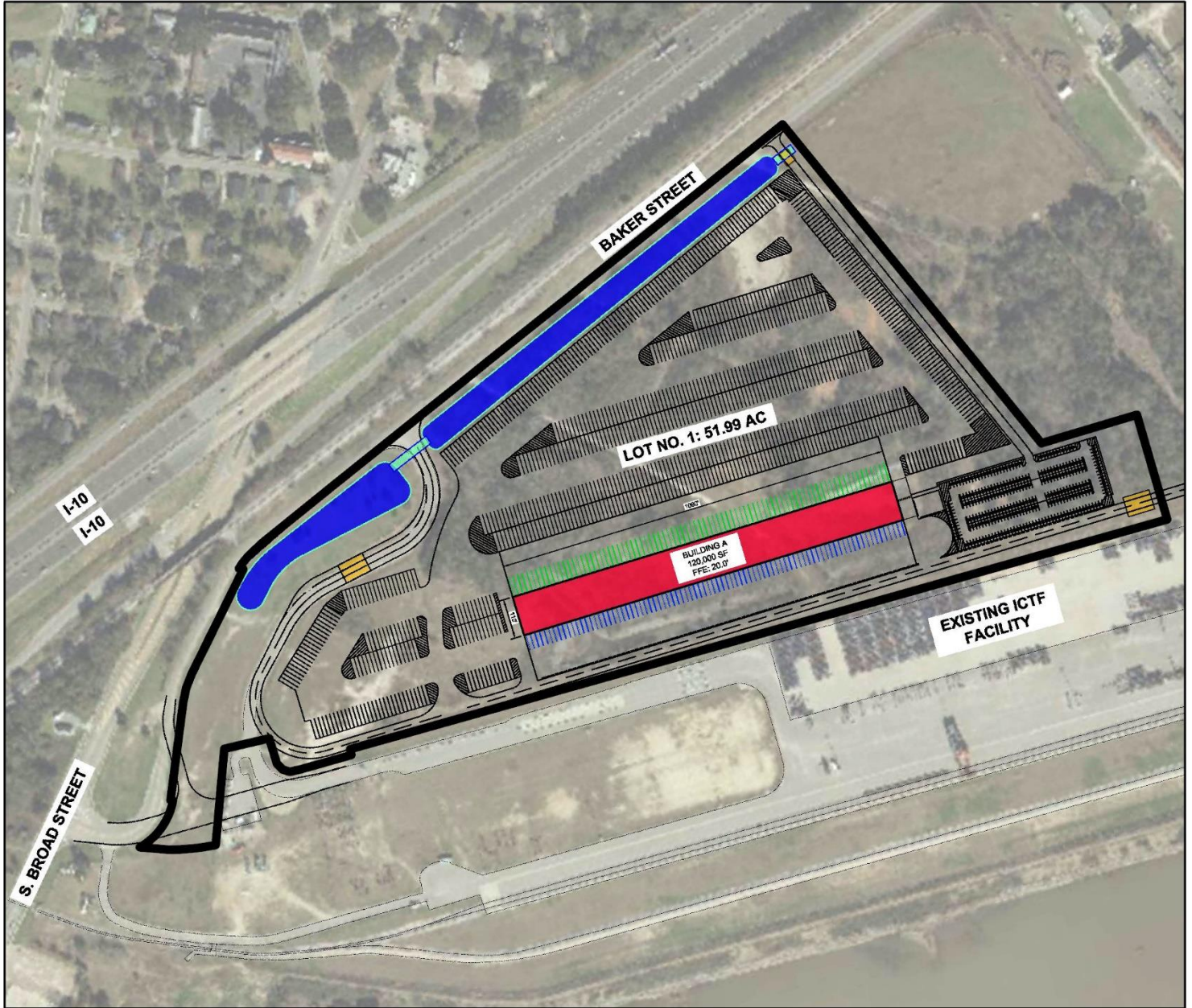
The site is surrounded by vacant land.

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 REQUEST Subdivision, Rezoning From R-2 And I-2 To I-2





# SITE PLAN



The site plan illustrates the proposed building, and parking.

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REQUEST Subdivision, Rezoning From R-2 And I-2 To I-2



NTS

**LOT A**  
2,217,426+- SF  
50.91+- ACRES

Map details include:  
 - Streets: BAY STREET, BROAD STREET, INTERMEDIAL HALL DRIVE, PRIVATE DRIVE, ELKINS CENTRAL GOLF COURSE.  
 - Flood Zones: FLOOD ZONE "A-1", FLOOD ZONE "A-2", FLOOD ZONE "A-3", FLOOD ZONE "A-4", FLOOD ZONE "A-5", FLOOD ZONE "A-6", FLOOD ZONE "A-7", FLOOD ZONE "A-8", FLOOD ZONE "A-9", FLOOD ZONE "A-10", FLOOD ZONE "A-11", FLOOD ZONE "A-12", FLOOD ZONE "A-13", FLOOD ZONE "A-14", FLOOD ZONE "A-15", FLOOD ZONE "A-16", FLOOD ZONE "A-17", FLOOD ZONE "A-18", FLOOD ZONE "A-19", FLOOD ZONE "A-20", FLOOD ZONE "A-21", FLOOD ZONE "A-22", FLOOD ZONE "A-23", FLOOD ZONE "A-24", FLOOD ZONE "A-25", FLOOD ZONE "A-26", FLOOD ZONE "A-27", FLOOD ZONE "A-28", FLOOD ZONE "A-29", FLOOD ZONE "A-30", FLOOD ZONE "A-31", FLOOD ZONE "A-32", FLOOD ZONE "A-33", FLOOD ZONE "A-34", FLOOD ZONE "A-35", FLOOD ZONE "A-36", FLOOD ZONE "A-37", FLOOD ZONE "A-38", FLOOD ZONE "A-39", FLOOD ZONE "A-40", FLOOD ZONE "A-41", FLOOD ZONE "A-42", FLOOD ZONE "A-43", FLOOD ZONE "A-44", FLOOD ZONE "A-45", FLOOD ZONE "A-46", FLOOD ZONE "A-47", FLOOD ZONE "A-48", FLOOD ZONE "A-49", FLOOD ZONE "A-50", FLOOD ZONE "A-51", FLOOD ZONE "A-52", FLOOD ZONE "A-53", FLOOD ZONE "A-54", FLOOD ZONE "A-55", FLOOD ZONE "A-56", FLOOD ZONE "A-57", FLOOD ZONE "A-58", FLOOD ZONE "A-59", FLOOD ZONE "A-60", FLOOD ZONE "A-61", FLOOD ZONE "A-62", FLOOD ZONE "A-63", FLOOD ZONE "A-64", FLOOD ZONE "A-65", FLOOD ZONE "A-66", FLOOD ZONE "A-67", FLOOD ZONE "A-68", FLOOD ZONE "A-69", FLOOD ZONE "A-70", FLOOD ZONE "A-71", FLOOD ZONE "A-72", FLOOD ZONE "A-73", FLOOD ZONE "A-74", FLOOD ZONE "A-75", FLOOD ZONE "A-76", FLOOD ZONE "A-77", FLOOD ZONE "A-78", FLOOD ZONE "A-79", FLOOD ZONE "A-80", FLOOD ZONE "A-81", FLOOD ZONE "A-82", FLOOD ZONE "A-83", FLOOD ZONE "A-84", FLOOD ZONE "A-85", FLOOD ZONE "A-86", FLOOD ZONE "A-87", FLOOD ZONE "A-88", FLOOD ZONE "A-89", FLOOD ZONE "A-90", FLOOD ZONE "A-91", FLOOD ZONE "A-92", FLOOD ZONE "A-93", FLOOD ZONE "A-94", FLOOD ZONE "A-95", FLOOD ZONE "A-96", FLOOD ZONE "A-97", FLOOD ZONE "A-98", FLOOD ZONE "A-99", FLOOD ZONE "A-100".  
 - Other labels: TO BE VACATED, FLOOD ZONE "A-1", FLOOD ZONE "A-2", FLOOD ZONE "A-3", FLOOD ZONE "A-4", FLOOD ZONE "A-5", FLOOD ZONE "A-6", FLOOD ZONE "A-7", FLOOD ZONE "A-8", FLOOD ZONE "A-9", FLOOD ZONE "A-10", FLOOD ZONE "A-11", FLOOD ZONE "A-12", FLOOD ZONE "A-13", FLOOD ZONE "A-14", FLOOD ZONE "A-15", FLOOD ZONE "A-16", FLOOD ZONE "A-17", FLOOD ZONE "A-18", FLOOD ZONE "A-19", FLOOD ZONE "A-20", FLOOD ZONE "A-21", FLOOD ZONE "A-22", FLOOD ZONE "A-23", FLOOD ZONE "A-24", FLOOD ZONE "A-25", FLOOD ZONE "A-26", FLOOD ZONE "A-27", FLOOD ZONE "A-28", FLOOD ZONE "A-29", FLOOD ZONE "A-30", FLOOD ZONE "A-31", FLOOD ZONE "A-32", FLOOD ZONE "A-33", FLOOD ZONE "A-34", FLOOD ZONE "A-35", FLOOD ZONE "A-36", FLOOD ZONE "A-37", FLOOD ZONE "A-38", FLOOD ZONE "A-39", FLOOD ZONE "A-40", FLOOD ZONE "A-41", FLOOD ZONE "A-42", FLOOD ZONE "A-43", FLOOD ZONE "A-44", FLOOD ZONE "A-45", FLOOD ZONE "A-46", FLOOD ZONE "A-47", FLOOD ZONE "A-48", FLOOD ZONE "A-49", FLOOD ZONE "A-50", FLOOD ZONE "A-51", FLOOD ZONE "A-52", FLOOD ZONE "A-53", FLOOD ZONE "A-54", FLOOD ZONE "A-55", FLOOD ZONE "A-56", FLOOD ZONE "A-57", FLOOD ZONE "A-58", FLOOD ZONE "A-59", FLOOD ZONE "A-60", FLOOD ZONE "A-61", FLOOD ZONE "A-62", FLOOD ZONE "A-63", FLOOD ZONE "A-64", FLOOD ZONE "A-65", FLOOD ZONE "A-66", FLOOD ZONE "A-67", FLOOD ZONE "A-68", FLOOD ZONE "A-69", FLOOD ZONE "A-70", FLOOD ZONE "A-71", FLOOD ZONE "A-72", FLOOD ZONE "A-73", FLOOD ZONE "A-74", FLOOD ZONE "A-75", FLOOD ZONE "A-76", FLOOD ZONE "A-77", FLOOD ZONE "A-78", FLOOD ZONE "A-79", FLOOD ZONE "A-80", FLOOD ZONE "A-81", FLOOD ZONE "A-82", FLOOD ZONE "A-83", FLOOD ZONE "A-84", FLOOD ZONE "A-85", FLOOD ZONE "A-86", FLOOD ZONE "A-87", FLOOD ZONE "A-88", FLOOD ZONE "A-89", FLOOD ZONE "A-90", FLOOD ZONE "A-91", FLOOD ZONE "A-92", FLOOD ZONE "A-93", FLOOD ZONE "A-94", FLOOD ZONE "A-95", FLOOD ZONE "A-96", FLOOD ZONE "A-97", FLOOD ZONE "A-98", FLOOD ZONE "A-99", FLOOD ZONE "A-100".

[illegible]

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