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STAFF REPORT – ADDENDUM*

REPORT DATE PLANNING BOARD MEETING
April 8, 2019 April 10, 2019

Case #19-06: SITE PLAN REVIEW Case #19-07: SPECIAL PERMIT

117 Union Street, 7 N Second Street, 115 Union Street,

121 Union Street, & 127-129 Union Street

Map: 53 Lots: 40, 41, 215, 216, and 146

Applicants: 117 Union Street LLC

128 Union Street, 4th Floor

New Bedford, MA 02740

Owner: Paul A. Piva & Gail Florek

10 Pequod Road Fairhaven, MA 02719

Applicant's

Agent: PO Box 1088

350 Bedford Street Lakeville, MA 02347

Prime Engineering

Addendum*

This is an addendum to the previous staff report provided for Case #19-06 & #19-07. The applicant has resubmitted revised plans as requested by the board at the

115, 117, 121 Union St Looking north from Union Street



previous hearing held on March 10, 2019. This addendum is provided to detail the changes to the plan from the previous submission.

The plans and application have been revised to formally included 127-129 Union Street (Map: 53 Lot: 146) as part of the development site.

Overview

The modified request is for **Site Plan** approval for new construction of a 42,650 SF mixed commercial residential building; located at **117 Union Street**, **7 N Second St**, **115 Union St**, **121 Union St**, and **127-129 Union Street** (Map: 53, Lots 40, 41, 215, 216, and 146) on an 12,525 SF site in a Mixed Use Business and Downtown Business Overlay zoned district.

Additionally, the applicant requests a **Special Permit (Case #19-07)** for a reduction of the number of parking spaces required for the proposed 42,650 SF mixed commercial and residential building. **The applicant proposes 1 parking space and 0 loading spaces where 106 spaces and 2 loading spaces are required under ordinance.**

Therefore, the applicant requests a reduction of 105 parking spaces and 2 loading spaces.

Existing Conditions

The project site is comprised of five lots with five buildings and a parking lot; all under the same ownership. In total the site is 12,524± SF with frontage on three streets. The site has 105′± of frontage on Union Street, 117′± on N. Second Street, and 106′± on Barkers Lane. The buildings at 117, 115, and 121 Union Street and 7 N Second Street, each are brick, flat roof, single story buildings varying in size from 873 SF-2,074 SF. The brick building at 127-129 Union Street, known as the "Moby Dick Chandler Building" is three stories high, fronting on Union Street, and a single story high, in the rear, fronting on Barkers Lane. The building is 8,652 SF. Almost the entire lot is impervious with buildings and the parking lot covering the land.

The existing parking lot area, located in the northeast corner of the site, has five (5) parking spaces. Metered on-street parking is available on Union Street and on the west side of N. Second Street. No parking is allowed on Barkers Lane. The board should note N. Second Street is one-way northbound. The entrance to the Elm Street parking garage is directly two blocks north at the terminus of N. Second Street at Elm Street.

Located in the heart of the historic downtown (see figure on last page for historic district boundary), the surrounding neighborhood is a mixture of commercial retail, office, and mixed-use buildings with residential units on the upper floors. Directly abutting the property to the west is the Garden Bar. Also, on the same block on the north side of Union Street are two recently restored mixed use properties. The restored buildings include residential space, a co-working space known as the Co-Creative Center, a juice bar café known as People's Pressed and hair salon known as Beauty Union. Directly south across Union Street is a professional office building with multiple tenants, known as the DeMello International Building. East across N. Second Street is St. Anne Credit Union. North across Barkers Lane is Custom House Square park and the historic, still active, United States Custom House. The Custom House is a national historic landmark on the National Register of Historic Places. Diagonally southwest across Union Street is the New Bedford YMCA.

Revisions Made to Previous Plans

Parcel added. The applicant has revised the plan to include 127-129 Union Street, known as Moby Dick Chandler Building. It should be noted that the applicant proposes changes to the rear portion of the Moby Dick parcel only. No changes are proposed to the three-story structure fronting on Union Street. The addition of this parcel has clarified some questions the board had at the previous meeting about supportive uses that were noted though not shown on previous plans.

The applicant proposes to submit an Approval Not Required (ANR) plan to create a new "L" shaped lot. The new lot would include the rear portion of the Moby Dick parcel and the four parcels to the east known as 117, 115, 121 Union Street and 7 N Second Street.

Additions to and reconfiguration of parking area. The proposed area where the handicapped parking space is proposed has been reconfigured. The parking space and curb cut have shifted west to move vehicular

movements away from the street light. An electronic vehicle charging station has been added next to the transformer in this area. Landscape screening is shown around the transformer. Bollards have been added in front of the parking space and loading area. Two grease traps are proposed under the parking space in this area. The board may wish to inquire on the reasoning for two grease traps and information about servicing the units in this configuration.

North Second Street Amenities. Three (3) U-shaped bicycle racks are proposed at the northeast corner of the site. The seasonal outdoor dining area has been identified on the plan at the southeast corner. Two (2) new Little Leaf Linden tress are proposed to be added in the sidewalk amenity area.

Utilities. The utilities connections have been updated to address DPI's previous comments. DPI comments have not yet been received confirming if the revisions are in conformance with their requirements. The board may wish to inquire about when the development proposes to make utility connections on Union Street; paving for Union street is expected to commence in May 2019, after which a moratorium will be put in place to hinder cutting into the road. If the applicant cannot meet this May deadline, the board may wish to put in place a protective covenant to complete roadway repairs per DPI direction.

Stormwater Report. A stormwater report has been submitted with calculations demonstrating no change in runoff rates pre- and post-construction. No changes have been made to the stormwater management plan for the site. Roof drains are still proposed to tie into the existing storm drains at Union Street. Staff noticed a solar facility is considered in the stormwater report but is not noted anywhere else on the plans submitted.

Proposed Conditions

The proposal is for the demolition of the four buildings on the east side of the site and the construction of a five (5) story building with a lobby/retail space on the first floor and forty-two (42) residential apartment units on the upper floors. In total the building will be 41,000 GFA with 32,000 GFA of residential floor area, and 8,200 GFA of retail/lobby space.

The project proposes twelve (12) one-bedroom units, seven (7) two-bedroom units, and twenty-three (23) studio apartments on the upper floors in the five-story building. The chart below shows the range of unit sizes.

The applicant also proposes to demolish the rear single-story building at 127-129 Union Street (Moby Dick

Building). In this rear area the applicant proposes to construct a single-story building $(33'-11^{7/8"}x30'-2")$. The building would have a single live/work unit, a trash storage room, and a bicycle storage room.

The trash and bicycle storage rooms are to be shared between this unit and the adjoining 42 residential units in the adjacent five-story building proposed.

Apartment type	Total	Size range
One bedroom units	12	428 SF - 466 SF
Two bedroom units	7	661 SF – 752 SF
Studio units	23	346 SF – 472 SF
Live/Work unit	1	
Amenity space	1	783 SF

On the first floor of the five-story building an open lobby with retail space is proposed. In addition to residential units the fifth floor includes a shared interior 783 SF amenity space with adjacent 34'±x10'± balcony/patio. No information has been provided regarding a basement level. The board may wish to inquire about any plans for a basement level.

Three balconies are proposed at the fifth floor on the south elevation (Union Street). Two balconies are for individual residential units $(14'\pm x\ 3'\pm \ and\ 10'\pm x\ 3'\pm)$ while the third $(35'\pm x\ 10'\pm)$ is accessible through the shared amenity space. Two balconies are proposed for individual residential units $(14'\pm x\ 3'\pm,\ 10'\pm x\ 3'\pm)$ at the fifth floor on the north elevation (Barkers Lane). Juliette balconies are proposed for seventeen (17) of the units

with four on both the south and north elevations (Union Street/Barkers Lane), and nine on the east elevation (N. 2nd Street).

The live/work space as proposed will have a separate slate walkway entrance off Barkers Lane. The unit will have a floor to ceiling glass garage door, as shown on elevation plans. The garage door is not in line with the driveway nor does it seem to be intended for vehicular use. Staff note the electric vehicle charging station and transformer are in line with this garage door.

Demolition & Site Preparation. The applicant proposes demolishing the four buildings on the east side of the site (117 Union Street, 7 N Second St, 115 Union St, 121 Union St) and the rear single-story portion of the Moby Dick Building (127-129 Union Street). The demolition plan should be revised to specifically note that the three-story building on 127-129 Union Street is not to be demolished and is to be protected in place, as it is a historically significant building.

The existing slate walkway along the Barkers Lane frontage is to be removed, stockpiled, and reset at the completion of the project. The existing streetscape and sidewalk materials along North Second Street are noted to be preserved.

Erosion Control Plan. An erosion control plan has not been submitted with the application. The board may wish to require the plan be submitted and show areas on site where materials will be stockpiled, and dust and erosion control measures to be utilized during demolition, site preparation, and construction phases. Also, any protection provided to adjacent buildings.

Parking and Loading Requirements

USE	PARKING REQUIREMENTS	LOADING REQUIREMENTS
Multi-family (3) or more per structure	Two (2) spaces per dwelling unit	One (1) loading space for each multifamily dwelling containing more than ten (10) dwelling units
Restaurant / Assembly Space	One (1) space per five (5) seats for which the building is designed or one (1) spaces for each 200 sq. ft. of gross floor area whichever results in the greatest number	One (1) loading space for each building containing 10,000 sq. ft. or more of gross floor area. Two (2) loading spaces for buildings containing 100,000 sq. ft. or more of gross floor area
Parking Calculations		

Parking Calculations 86 parking spaces (2 per dwelling unit) 1 Loading space (1 per multifamily building) 20 parking spaces (1 per 200 SF) 1 Loading space (1 per building 10,000 SF+) 2 Loading space required

Parking & Loading. The applicant proposes one (1) handicapped parking space. As shown on the plans submitted, the one parking space is proposed in the rear portion of the Moby Dick parcel. The board should note the zoning ordinance allows for parking to be provided on an adjoining lot held in the same ownership. The applicant has moved the proposed parking space westward to distance the curb cut away from the sidewalk gas lamp. The proposed parking area is 8'x20' with a 8'x20' loading area. Red brick is the proposed

surface material for the parking space. The surface material and patterns need to be reviewed and approved by the Historic Commission.

The application indicates twenty (20) long term and twenty (20) short bicycle term parking spaces. No information is provided about how many bicycles can fit in the storage room; nor how the bicycle storage room accessible for residents. The board may wish to inquire more about specifics.

Under the zoning ordinance the proposal requires 106 spaces and 2 loading spaces; therefore, the applicant petitions the Board for a Special Permit to allow for a parking reduction. The applicant requests a reduction of 105 parking spaces and 2 loading spaces.

Traffic Impact & Access Study. The applicant has provided a traffic generation and available parking analysis within the Development Impact Statement provided.

Using the Institute of Traffic Engineers Trip Generation Manual, land use code for mid-rise apartments (3 to 10 floors) the applicant predicts the site will experience 13 trips during the morning peak (7am-9am) with 4 vehicles arriving and 9 departing; and 17 trips during the evening peak (4pm-6pm), with 10 vehicles arriving, and 7 vehicles departing.

Additionally, the applicant has provided an Exhibit "Available Parking & Transportation" that shows the onstreet and off-street parking available in the downtown.

Circulation. As the building will encompass the entire lot there is no vehicular internal site circulation proposed. The one parking space proposed in front of the live/work unit in the northwest corner of the site. Vehicles will enter the space from Barkers Lane and exit onto the same.

Pedestrian access into the building is provided via six (6) doors on the proposed five-story building. Two doors are proposed on Union Street; one providing direct access to a stairwell to the upstairs residential units. The second providing general access to the first-floor lobby/retail space. One door is proposed on North Front Street and another on Barkers Lane, both to also provide access to the first-floor lobby/retail space. The fifth door is shown on the northwest corner of the building to provide access to fire service equipment. A sixth door is also shown in the middle of the west elevation. This door exits to a slate walkway which provides access from the retail/lobby space and main trash compactor room to the trash storage and bicycle storage rooms to be located on the adjacent building.

Access to the live/work space is provided by another proposed slate walkway just west of the transformer area to the main door. A glass garage door is also shown on the plan elevations for this space. It is not intended for vehicle parking nor aligned with the parking space.

Mechanicals/Utilities. Utilities have been revised to address DPI comments. Underground electrical, water, sewer, and gas lines service the site. New connections for water and gas are proposed off Barkers Lane. Sewer service is to be replaced on the Union Street side of the building. DPI has commented that construction within the Union Street ROW must occur prior to the application of the top coat of paving in May 2019. A new transformer is proposed in the northwest corner of the site.

Exhaust pipes, a generator, an energy recovery unit, and 42 condensing units (1 per residential unit) are proposed on the rooftop. 3D modeling perspectives have been submitted to the historic commission of the rooftop mechanicals with and without screening. No additional specification have been provided regarding these rooftop mechanicals.

Operations. The application provides no information about the operations of the site generally or the proposed commercial space. The board may wish to request more information.

Development Impact Statement. A Development Impact Statement (DIS) has been provided with the application. The DIS provided summarizes the project, describes the existing conditions, proposed conditions, and details the relief requested from the zoning requirements.

The applicant requests an increase in the density requirement. The City ordinance allows for 1 unit per 1,000 SF. The applicant proposes 5.12 units per 1,000 SF. The Planning Board requested a market analysis be submitted for their review to demonstrate the demand for the proposed level of density in this area. The market analysis has yet to be submitted.

The Planning Board should note that the Zoning Board of Appeals will vote on whether to allow for this variation in requirements through the Downtown Business Overlay District Special Permit.

The development impact statement submitted does not address the project phasing as per section 5355. The board may wish to have the applicant address the following:

- Describe the methods to be used during construction to control erosion and sedimentation through use of sediment basins, mulching, matting, temporary vegetation, or covering of soil stockpiles.
 Describe the approximate size and location of portion of the parcel to be cleared at any given time and length of time of exposure.
- Describe how the adjacent historic building will be protected during demolition and construction.
- Describe the phased construction, if any, of any required public improvements, and how such improvements are to be integrated into site development.

Project Narrative. A project summary has been provided with the application detailing the proposed project and relief sought. The site plan review ordinance per requires information about the project time line, phases, and estimate of cost for all site improvement planned.

"The site plan shall be accompanied by a written statement indicating the estimated time required to complete the proposed project and any and all phases thereof. There shall be submitted a written estimate, showing in detail the costs of all site improvements planned." New Bedford Code of Ordinances Ch. 9 Section 5452

The applicant has noted in the Development Impact Statement that utility updates will cost approximately \$20,000. The applicant has not provided an estimated construction start date or phasing information.

Landscaping/Streetscaping. As the proposed buildings and driveway encompass almost the entirety of the lot there is little room leftfor landscaping. The proposal retains the existing street trees and has been revised to include two additional street trees (little leaf linden trees) along North Second Street. The proposal also includes an unspecified species of planted evergreens as a screen around the transformer.

https://library.municode.com/ma/new_bedford/codes/code_of_ordinances?nodeId=COOR_CH9COZO_S5000ADPR_5400SIPL_RE

¹ Ch. 9 section 5452 available online:

On Barkers Lane the applicant proposes to expand the sidewalk by resetting the 4' wide slate, adding a 3' wide brick ribbon and a vertical granite curb. The applicant proposes no changes to the existing streetscape along Union Street or N. Second Street other than the additional street trees and bicycle racks at this time.

Snow Storage & Waste Receptacles. No information is provided as to snow storage or removal for the one parking space proposed.

An interior trash compactor room is identified in the center of the first floor of the five-story building and a trash storage room is proposed in the proposed adjacent single-story building. The trash and bicycle storage areas are currently on a separate parcel from the main site. The applicant will need to legally combine this area with the main development through a Form and/or record an easement for these supportive uses on an adjacent parcel.

Review Comments

As required under city ordinance, the case submittal documents were distributed to City Clerk, City Solicitor, Health Department, Inspectional Services, Engineering, Public Infrastructure, Conservation Commission, Fire Department and School Department.

Comments were not received as of the publication of this report; any comments received will be made available at the public meeting.

Master Plan Goal

The proposal is consistent with the master plan's goal to promote a mixed-use environment in Downtown New Bedford, and in other commercial centers and corridors to ensure a vibrant community during the day, evening and weekends, that creates walkable village like neighborhoods throughout the city.

Materials for Consideration

The plan submission is shown as "Proposed Commercial/ Residential Development 117 Union Street New Bedford, MA 02740" dated March 21, 2019, date stamped received by City Clerks' Office March 26, 2019. Engineered plans were prepared by Prime Engineering, in Lakeville, MA, and stamped by Richard Rheaume, PE. Architectural plans were prepared by STANTEC, in Boston, MA, unstamped. The plan set consists of the following sheets:

	U	
•		Cover Sheet
•	C-1	Existing Conditions & Demolition Plan
•	C-2	Site Layout & Utilities Plan
•	C-3	Site Details
•	C-4	Site Details
•	A-101	Floor Plan – Level 1
•	A-102	Floor Plan – Level 2
•	A-103	Floor Plan – Level 3
•	A-104	Floor Plan – Level 4
•	A-105	Floor Plan – Level 5
•	A-106	Roof Plan
•	A-201	Elevations North & South
•	A-202	Elevations – East & West
•	A211	Building Sections

In addition to the foregoing submitted materials, the Planning Board may also wish to consider:

Waivers

The applicant submitted a number of waiver petitions for consideration by the Planning Board:

• **Topography and Drainage Plan** – The applicant petitions: "There currently exists a structure and pavement on the site. No excavation of the site is being proposed, therefore topography and drainage will not be altered.

Site topographic changes would be expected to alter the drainage patterns onsite, which will determine downstream volume and velocity.

• **Required Off Street Parking** – The applicant petitions: "There is adequate parking available parking on the streets and the nearby parking garages."

This is not valid waiver request. A reduction in the number of required parking spaces is available only through a special permit.

Staff Recommendations

NOTE: It is recommended that the Planning Board hear the revised project presentation, receive public comment, and continue the case hearing.

The Historic Commission was unable to complete review of the plan set at their last meeting and Planning Board approval may be impacted by any decisions of the Historic Commission.

Therefore, the Historic Commission and Planning Board will host a special joint meeting of the two boards which has been scheduled for May 6, 2019, 6pm in the Main Library.



Site Plan Approval. Having reviewed the submitted materials, planning staff offers the following recommendations for conditions to the Planning Board should it act favorably on the requested site plan approval for the project:

Τŀ	and the following specific conditions he applied to this desirion:		
That the following specific conditions be applied to this decision:			
	This project requires approval by the New Bedford Historic Commission. Any conditions imposed		
	by the Historic Commission decision shall also be conditions of this approval.		
	The exterior lighting and signage have not been approved and will require a separate		
	modification submittal.		
	Information is to be submitted about the basement level.		
	Project Narrative including estimated project start dates and phasing information be provided.		
	A copy of the Final Market Analysis is to be submitted for Planning Board review.		
	The supportive storage uses (trash and bicycle storage) on the adjacent parcel are to be made		
	legally associated with the main project site either through an Approval Not Required Plan or		
	Legal Easement allowing for access to the storage facilities.		
	Specifications for on rooftop mechanicals is to be submitted.		
	Information about any proposed solar installation is to be submitted to the board for review.		
	All existing streetscaping materials, including landscape, lighting, hardscape, are to be		
	preserved, retained, or removed as per approval of the Historic Commission and agreement		
	with the Department of Public Infrastructure.		
	The demolition plan shall be revised to note the three-story building at 127-129 Union Street is		
	not to be demolished.		
	A Demolition and an Erosion Control Plan shall be submitted for administrative review and		

approval by the Planning Board by [date to be determined by the board and applicant].

- □ The soil conditions are to be tested prior to any construction and the results be provided to the board for review. Further, if the soil test results show relatively contaminant free soil, the site plan is to be modified to include infiltration units to store 1-inch of runoff from impervious areas on site. The revised plans are to be provided to the board as a plan modification for review.
- □ Or, If the applicant is to receive a waiver of the local stormwater management permit requirements from DPI, evidence of such waiver must be provided to the Planning Board prior to construction commencing.
- ☐ That the following general conditions also be applied to this decision:
 - The project shall be completed according to the plans, notes, reports, and specifications submitted for consideration and final approval by the Planning Board.
 - The applicant shall submit final plan revisions to the Planning Division in the following formats: one (1) -11" x 17" Plan Set and one (1) CD or USB with Plan Set in PDF format and shall ensure that these same plans are properly submitted to the Department of Inspectional Services.
 - The applicant shall ensure that a copy of the Notice of Decision, bearing the certification of the New Bedford City Clerk signifying no appeal has been made against the project's approval, be provided for the Planning Division Case file folder.
 - That the applicant shall ensure a copy of the Notice of Decision bearing the certification of the city of New Bedford City Clerk, signifying no appeal has been made against the project's approval, be recorded at the Registry of Deeds.
 - The applicant shall ensure that a copy recorded decision be provided for the Planning Division Case file folder.
 - The applicant shall present any proposed modification from the approved plans for consideration to the City Planner for determination as to whether the modified plan must return before this Board for further review.
 - The rights authorized by the granted approval must be exercised by issuance of a Building Permit by the Department of Inspectional Services and acted upon within one year from the date the decision was granted, or they will lapse.

Materials Provided by the Applicant are available at: (http://www.newbedford-ma.gov/planning/planning-board-agenda-info-2019/)

List of Items Requested from Previous Meetings And Staff Review of Revised Plans

Planning Boar	d .	
	REQUEST	NOTES
Still needed	More detailed information on rooftop mechanicals- dimensions, model types, etc	
	Once exterior materials are approved by the Historic Commission, specifications to be submitted to Planning	
	Board for informational purposes.	
	Elevation and massing study/comparison of properties within three blocks east of the site	
	Market Study to be provided	
	Project narrative including estimated project start dates and phasing information to be provided	
	The supportive storage uses (trash and bicycle storage) on the adjacent parcel are to be made legally associated	
	with the main project site either through an Approval Not Required Plan or Legal Easement allowing for access	
	to the storage facilities.	
	Roof top mechanicals specifications are to be submitted.	
	Solar installation is to be submitted	
	Evidence of waiver of local stormwater management permit requirements, if granted, is to be submitted	
	Demolition and Erosion Control Plan is to be submitted	
	The demolition plan shall be revised to note the three-story building at 127-129 Union Street is not to be demolished.	
Questions	Submit a revised set of plans with consistent callouts on all sheets. Civil plans must match architectural	Provided
	floorplates.	
	Stormwater Management Report, not waived, applicant is to provide full storm water report	Provided. Report demonstrates no changes in run-off rates Pre- vs. Post-Development. Applicant needs to submit proof or
		DPI comments need to confirm that a waiver has been granted for the local municpal stormwater permit requirements.
	DPI Comments should be addressed in full and any revisions made to plans	DPI comments will need to confirm
	N 2nd Street sidewalk activation and design – The board would like to see this area activated more through	Provided illustration to Historic details not included in site plan application. Should be presented to Planning Board. Board
	design, street furniture, hardscape and landscape design.	may incorporate elements into a condtion, if desired.
	N 2nd Street - Grease trap to be relocated to a more discreet location	The grease trap has been relocated. A second grease trap has been added. It is unclear why a second trap has been added. Also, unclear how units will be serviced.
	Barkers Lane parking space – The board needed clarity to understand the context of development on this	Bollards added, space redesigned
	adjacent parcel. If parking is proposed in this location the board requested bollards or a wheel stop be installed.	
	You may want to consider an alternative loading scenario to this parking space.	
	Bicycle accommodation to be clarified and shown on plans.	3 inverted U public bike racks noted on plan; bicycle storage room provided on 127-129 Union parcel. No detail about how
		many bikes can be stored in the bike storage room or how. Also, no details on how access is provided to the bicycle
		storage room.
	Total lot size on plan submitted does not include whole parcel of 127-129 Union Street.	The whole property should be included on the plan information at this point. The applicant should clearly note the
		intention of the applicant as it relates to the front three-story building even if it is no changes. It should be noted to be
		retained during demolition activities. The applicant still needs to legally assoicate the rear portion of the parcel with the
		main site either through ANR or easements for access to the storage areas.
Addressed	Site Context Perspectives to be submitted	Submitted to Histroic Commission. Should also be submitted to Planning Board.
	Clarify the properties involved in the scope of the proposal. Plan set must include all properties involved in the	127-129 Union Street added formally to the application.
l	proposed development. For the property at 127-129 Union, you will need to show the entire parcel. You can	
l	draw a line for the limit of work to the Moby Dick building, but you should only locate storage, trash, utilities etc	
	in that space with accurate portrayal on a floorplan with dimensional requirements.	
	A note should be added to the plans that all existing streetscaping materials, including landscape, lighting and	This note has been added to the plans.
	hardscape are to be preserved, retained, removed, or relocated as per approval of the Historic Commission and	
	agreement with the Department of Public Infrastructure.	
		CTAFF COMMAGNITO

