

City of Salem Board of Appeals

Meeting Minutes

Wednesday, April 19, 2017

A meeting of the Salem Board of Appeals (“Salem BOA”) was held on Wednesday, April 19, 2017 in the third floor conference room at 120 Washington Street, Salem, Massachusetts at 6:40 p.m.

Mr. Peter Copelas (Vice-Chair/Acting Chair) calls the meeting to order at 6:30 pm.

ROLL CALL

Those present were: Peter A. Copelas (Vice-Chair/Acting Chair), Mike Duffy, Jimmy Tsitsinos, Paul Viccica (alternate), and Tom Watkins. Those not present were: Rebecca Curran (Chair), Jim Hacker (alternate). Also in attendance Tom St. Pierre - Building Commissioner, Erin Schaeffer - Staff Planner, and Colleen Anderson – Recorder.

REGULAR AGENDA

Project A public hearing for a petition seeking an amendment to a previously issued decision, dated March 1, 2017, to include a third floor dormer and a few minor changes.

Applicant **LEE DEARBORN**

Location **32 BUFFUM STREET (Map 25 Lot 255)(R2 Zoning District)**

Documents and Exhibitions

- Application dated March 29, 2017 and supporting documentation

Lee Dearborn of 32 Buffum Street was present to discuss the project. Dearborn stated that the previously approved plan was presented with dormers, however; permission to include the dormers was not specifically given. He was not aware that the dormers are considered a third story and not a half story. They may not be added due to cost but he wanted permission to construct them regardless.

Dearborn clarified that the plans dated 1/23/2017 have only difference, not shown in the plans, is an existing first floor window will become a door to provide a second means of egress. St. Pierre noted that the door does not require relief.

Mr. Viccica – asked how not constructing the gables will alter the use of the space. Dearborn replied that the front portion of that floor will not have an occupiable space but the new rear shed dormer will provide additional light.

Acting Chair/Vice-Chair Copelas opens public comment.

No one in the assembly wished to speak.

Acting Chair/Vice-Chair Copelas closes public comment.

Schaeffer – reiterated that previously it was unclear that the petitioner was requesting three stories rather than 2 ½, no changes have been made to the plans, and the statement of grounds is the same. The amendment would be that the petitioner is requesting a change in the plan to reflect 3 stories not 2 ½.

Motion and Vote: Mr. Duffy makes a motion to amend the previously issued decision, dated March 1, 2017, regarding the Special Permit per 3.3.5 Nonconforming Single and Two-Family Residential Structures of the Salem Zoning Ordinance to reconstruct, extend, or structurally change the existing structure, to include a third floor dormer and the few minor changes reflected in the petition. The motion is seconded by Mr. Viccica. The vote was unanimous with five (5) (Peter A. Copelas (Acting Chair/Vice-Chair), Paul Viccica, Tom Watkins, Mike Duffy, and Jimmy Tsitsinos in favor and none (0) opposed.

Project	A public hearing for a petition requesting a Variance per Sec. 4.1.1 <i>Table of Dimensional Requirements</i> to allow the construction of a 6' x 28' front porch.
Applicant	3 MALONE DRIVE LLC
Location	11 NURSE WAY (Map 9 Lot 259)(R-1 Zoning District)

Documents and Exhibitions

- Application dated March 29, 2017 and supporting documentation

Ryan Herick and Dominic Zulo of 3 Malone Drive LLC were present to discuss the project. Herick stated that a new home is under construction at 11 Nurse Way and are applying for a hardship Variance for a front porch constructed at 6 feet deep instead of 5 feet deep, resulting in the front porch being 1 foot into the 15 foot front yard setback. In order for the porch to conform to the required setbacks it would need to be completely removed and reframed with new footings and a new stone wall that they placed in front of the deck.

Acting Chair/Vice-Chair Copelas – asked where the 14 foot dimension fell upon the deck as it is currently constructed. Herick replied to the framing. Mr. Viccica – noted that the cornice also had an approximate 1 foot overhang. St. Pierre – added that since the new porch is on cul-de-sac it is further away from their neighbors on either side and across the street.

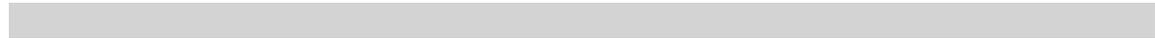
Acting Chair/Vice-Chair Copelas – stated that relief could be granted without detriment to the public good and literal enforcement would create a substantial hardship to the applicant. What special conditions or circumstances affect this land, building, or structures that don't affect others? Herick replied that there is more greenspace, it is not thickly settled, and the adjacent neighbors' house is setback unlike in other areas. Mr. Watkins – added that being located on a cul-de-sac is also a special condition.

Acting Chair/Vice-Chair Copelas opens public comment.

No one in the assembly wished to speak.

Acting Chair/Vice-Chair Copelas closes public comment.

Motion and Vote: Mr. Duffy makes a motion to approve the application for a Variance per Sec. 4.1.1 *Table of Dimensional Requirements* to allow the construction of a 6' x 28' front porch. The motion is seconded by Mr. Viccica. The vote was unanimous with five (5) (Peter A. Copelas (Acting Chair/Vice-Chair), Paul Viccica, Tom Watkins, Mike Duffy, and Jimmy Tsitsinos in favor and none (0) opposed.



Project	A public hearing for a petition of, requesting a Special Permit per <i>Sec. 3.0 Table of Uses</i> to allow a historic carriage house to be converted into a dwelling unit.
Applicant	LORRAINE BOUCHER
Location	13 ARTHUR STREET (Map 23 Lot 35)(R-2 Zoning District)

Documents and Exhibitions

- Application dated March 28, 2017 and supporting documentation

Dean and Lorraine Boucher of 13 Arthur Street were present to discuss the project. Boucher stated that they have lived on the property, a two-family house, for 25 years. The rear structure has been used for storage but they would like to convert it into a rentable 1 bedroom carriage house. The structure was built between 1907 and 1911 and neighbors have said that horses were once kept there. It has gas, sewer, and water connections and on-site parking.

Acting Chair/Vice-Chair Copelas – asked if he is the primary resident living in the main two-family house on the property and if the rental of the rear structure would result in a third tenant in an R-2 district. Boucher replied yes. Mr. Viccica asked when the renovation on the structure had taken place. Boucher replied approximately 22 years ago, with new windows, and siding. The roof has not been altered. Architect David Jaquith is proposing to install more historic features that will make it resemble a carriage house, although there is no

documentation of the original structure is being presented. The vinyl siding was added to deter the moisture from the garden that a rear neighbor was planting at the back side of it. The 2x4 balloon framing is still exposed on the interior and the rubble stone foundation is still intact. The porch and concrete foundation were also already in place, however; when he purchased it part of it had been torn down to the size it currently is today. In old maps/plans the carriage house was larger than the main house.

Mr. Viccica – noted that the applicant is using the historic carriage house ordinance as a density bonus. Acting Chair/Vice-Chair. Copelas – stated that the intent of that ordinance is to create an incentive to restore the historic structures however; this structure has no traditional carriage house features and only structures built prior to 1900 are eligible. Schaeffer – added that a historic carriage house in an accessory building originally built to house carriages, horses, or for use as a barn, in its present location, since 1900. The map shows a structure in place in 1911 but there no earlier map has been provided at this time. Boucher replied that he has searched and the earliest map they have been able to find is the one that was presented from 1911.

David Jaquith, Architect, of 81 Railroad Avenue, Rowley, MA presented elevations of the proposed project. Acting Chair/Vice-Chair Copelas – reiterated that the massing and shallow pitched roof are not the characteristics of 1900 era carriage house and other features have been dramatically changed. Jaquith disagrees and noted that other outbuildings in the neighborhood have similar features including the low pitched roof. The proposed renovation will consist of new 2 over 2 windows, french and barn doors, new clapboards 4” to the weather, to make it reflect an early 1900’s structure. A new stairway will be constructed to provide a second means of egress. Acting Chair/Vice-Chair Copelas – noted that these missing items are integral to the application being reviewed to better understand the nature of how this historic building would be restored. Stating that ‘it will be restored to a carriage house’ is too ambiguous. Jaquith suggests a continuance to the next regular meeting. Viccica – added that all of the proposed elevations and interior photos, including window headers, should be provided so the Board will feel comfortable with the proposed renovation as it relates to the carriage house ordinance.

John Farnsworth, land surveyor for the project, stated that no documentation was found stating that it didn’t exist before 1900 and has used his aerial and topographic map and very little information was found but the structure is not out of character with the neighborhood.

Motion and Vote: Mr. Duffy makes a motion to continue the public hearing to the next regularly scheduled meeting on May 17, 2017. The motion is seconded by Mr. Watkins. The vote was unanimous with five (5) (Peter A. Copelas (Acting Chair/Vice-Chair), Paul Viccica, Tom Watkins, Mike Duffy, and Jimmy Tsitsinos in favor and none (0) opposed.



Project A public hearing for a petition of, requesting a Special Permit per *Sec. 3.3.3* of the Salem Zoning Ordinance, *Nonconforming Structures*, to allow the petitioner to build a nonconforming structure, a Variance to *Sec. 5.1.5* of the Salem Zoning Ordinance, *Parking Design*, to exceed the maximum width of entrance and exit drive.

Applicant **295 BRIDGE STREET ASSOCIATES**
Location **293 BRIDGE STREET and 297 BRIDGE STREET (Map 26, Lots 634, 635)(B-4 Zoning District)**

Documents and Exhibitions

- Application dated March 29, 2017 and supporting documentation

Attorney Joseph Correnti, 63 Federal Street, represents the applicant

Other presenters include:

- Andrew McBeth, Greenleaf Construction (Contractor)
- Mark McLeod, Turner Group (Engineer)
- Andrew Loverud, Design Science (Architect)
- Bob Matvichuk , F.W. Webb (Salem Store Manager)

Atty. Correnti stated that the 293 Bridge Street lot is the lot that the F.W. Webb building and storage area sits on and 297 Bridge Street is the adjacent lot that was leveled, remediated, paved, through an RFP process, by 295 Bridge Street Associates (F.W. Webb.) The lot is now a municipal parking lot owned and run by the City of Salem, and F.W. Webb and The City of Salem are both on the application. Both parcels were party to a rezoning petition in 2016 that was approved by both the City Council and Planning Board, and are now considered a B4 zone. For approximately 10 years the parcels were previously an NRCC zone which made it a nonconforming use, as well as other uses before that.

Atty. Correnti stated that the petition request is for a special permit to allow a single story 7,600 square foot addition to the Webb building, to be used as a plumbing fixture showroom, on 293 Bridge Street lot. Also being requested is variance to enlarge the maximum curb cut allowed under the B4 zone. The ordinance calls for 30 feet and three curb cuts of different widths, ranging from 28 feet to 67 feet wide.

Atty. Correnti stated the plan has been modified from two stories to one and from over 20,000 square feet 16,000 and finally to 7,600. The only construction along the parking lot side of the building will be along the building itself and for a new ramp. No additional parking is needed.

McCloud stated that the site plan show existing tractor trailer movements to maneuver up to the loading dock on the East side of the building. When deliveries arrive the tractor trailer will need to block both lanes of traffic to maneuver backwards onto the site and up to the dock. The proposed plan will allow tractor trailers to pull into the parking lot, no matter

which direction they are arriving from, and maneuver on the site. There previously was no closed drainage system on the lot but the new parking lot now has storm water collection system. The largest existing curb cut is in 95 feet wide and in front of the building, and vehicles parked in that area must back up onto Bridge Street to exit the parking lot. The proposed curb cut in that area is 28 feet and the cars will be able to maneuver within the lot before exiting onto the Bridge Street.

McCloud stated that two new loading docks that are proposed on the West side of the building. A new 67 foot curb cut will tractor trailers will allow tractor trailers to pull completely into the parking lot, from either direction on Bridge Street, and back-up to the loading docks, and the proposed maneuvering paths are shown in plan. The drainage will remain slopped towards Bridge Street and with a connection to an existing collection system. They are having meetings with the Conservation Commission and drainage calculations show a reduction in the rate of run-off into the City's drainage system on the East side of the building, because the larger proposed detention basin will detain and drain more water on site. The current F.W. Webb lot is virtually impervious, the addition will be placed over an existing paved area, and the amount of greenspace on the East side of the building has the potential to be increased.

St. Pierre - noted that after meeting with the City of Salem, Webb revised the eastern most driveway so that vehicles would not be backing up into pedestrians walking across the driveway. McCloud added that Mass Highway sidewalk and crosswalk details can be implemented to highlight the pedestrian area.

Mr. Viccica – asked for the estimate of tractor trailer trips during the week and if the showroom will increase that number? A low number of deliveries is driving the need for a 67 foot curb cut that tractor trailers, vehicles, and pedestrians must all cross. If alternative options haven't been considered at the 67 foot curb cut they should. Vehicles could start to enter and exit at multiple points throughout that opening. Matvichuk replied approximately 1-2 per day or 10 per week and there should be no increase in the number of deliveries. Tractor trailers blocking Bridge Street to back-up to a loading dock is an inconvenience and unsafe for pedestrians. Mr. Viccica – asked if this project will go before the Planning Board or Site Plan Review for a review of; the location of trash, lighting of the parking lot fitting in with the neighborhood, etc. Atty. Correnti replied yes to Planning but the expansion is small that it does not trigger a Site Plan Review. Webb must make sure that items such as lighting comply with City ordinances and the various City Departments will review and enforce those items. Mr. Viccica – added that all lighting locations and requirements for a Special Permit should be included in the future review as well as considering how the request for a 67 foot curb cut can be reduced.

Mr. Viccica – asked about the temporary snow storage. McCloud replied that snow would be stock piled at the rear and removed by truck. Only 33 parking spaces are required and 37 are being provided so there are extra spaces for additional snow storage. The BOA needs to determine if the snow storage will have a detrimental effect on the neighborhood. Atty. Correnti added that the snow storage and removal will be reviewed by the Conservation Commission and with the Planning Board for flood hazard. The special permit is for the

extension of a nonconforming structure but how the project works as a whole does need to be understood and it will be reviewed.

Atty. Correnti noted that the 297 lot was contaminated but was a group effort clean-up project and there is not an environmental cap on the now odd shaped paved lot with no new construction.

Loverud stated that the existing self-serve area will be expanded to 1500-200 square feet with offices on the first and second floors, and the upper five floors will be storage and warehouse space. One new 8-9 feet wide and 20 feet long stair tower is being added for a second means of egress, totaling two. The proposed addition will be showroom/retail facing Bridge Street. Two loading docks, a ramp for a forklifts, and new windows will be added to the west façade. The building will become handicapped accessible, which it currently is not. Atty. Correnti noted that the building height and rear yard setback make it nonconforming, the single story addition and jogs at the rear are because of the nonconformities, but there are no new nonconformities and no new relief is being requested. A single story flat roof structure should have minimal impact on the neighborhood.

Acting Chair/Vice-Chair Copelas – asked if the mechanical units would be placed on the roof of the addition. Loverud replied that there would be three small units in the middle of the new flat roof to serve the addition and the expanded interior. The Special Permit request has effects on the site and the BOA will review them, especially since lighting for loading docks on the opposite site of the building will create activity and lighting that will impact the neighborhood.

Acting Chair/Vice-Chair Copelas opens public comment.

Fred Bevisheimer of 17 1/2 River Street. President of the Federal Street Neighborhood Association. The FSNA was unanimously opposed the B4 Zoning change passed by the City Council and have unanimously approved the appeal of that decision. BOA should be considering zoning plans with the zoning change decision is still in question, a hardship for the Variance request has not been heard, and how can there be no Site Plan Review when they were committed to it at public hearings and to the City Council in connection with granting a zoning change. Acting Chair/Vice-Chair Copelas – replied that the Board must assume that the zoning is as it is petition and it will be reviewed as such with the requirements they are obligated to consider. The statement of hardship has been addressed in the petition but should be read aloud.

Barbara Clearly of 122 Federal Street. Is not in support of granting the requests, Webb compromises are appreciated but does not want a B4 zoning next to the neighborhood with takes away NRCC Plan and Site Plan Review which protect the neighborhood from being in view of tractor trailers. City Council assured them of Site Plan Review. Is there a P&S Agreement that shows Salem as the owner?

Meg Twohey of 122 Federal Street. Requests that the BOA make a site visit, is interested in the setbacks at the rear lot line and B4 zoning, 8,000 square feet of outside storage, a

concrete pad, and dumpster is proposed and will be seen by their residential neighbors, how will customers/pedestrians access to the building and showroom, and the site should receive a Site Plan Review.

Jennifer Firth of 3 Carpenter Street. President of Historic Salem. She is a commuter that walks to the T and a 67 foot curb cut is dangerous for pedestrians. Suggests the BOA request a statement from Public Safety regarding tractor trailer trucks accessing the site.

Carol of 122 Federal Street. The hardship cannot be self-inflicted. Regarding the B4 approval, P&S Agreement, and Memorandum of Understanding weren't there agreements to protect the neighborhood? Is it a public document?

Jane Arlander of 93 Federal Street. The proposed changes don't enhance the neighborhood, some residents have left because of the early morning tractor trailer noises, snow piles have damaged residential fences, Webb have not maintained their sites cleanliness or manicured greenspace, Webb is proposing to make more of this visible to the residential neighborhood, the surface of the new municipal lot damaged the outskirts of the rear wetlands allowing water to sit which lead to mosquitos, which a dumpster and snow will not help. A sidewalk will be needed for pedestrians and those pedestrians do get splashed by vehicles during times of flooding. 2 large planters will be removed from the lot for trucks to maneuver as well as approximately 2,000 square feet of greenspace to buildings West.

Justin Whittier of 10 River Street. This project has been Webb driven and Planning Board was not comfortable giving their unanimous approval for this project and suggested the BOA review the Planning Board minutes.

Dan Madigan of 14 River Street. The BOA should be reviewing the entire property and the neighboring Alpha Auto Motors site is owned by Webb. What are the plans for that site?

Jeremiah Jennings of 18 River Street. Is this an allowed use in a B4 zone? Do the changes to the existing building require additional variances?

Tim Jenkins of 18 Board Street. Is a showroom an expansion of the use since the building was for professionals only and not open to the public? Would showroom use require a variance? Some case law indicated that increased use does expand use. Schaeffer – replied that a showroom is an allowed use in a B4 zone and the structure requires a special permit to expand a nonconforming structure. Mr. Copelas – the BOA does not review case law and identifies uses the same as the Planning Board.

Atty. Correnti – stated that the use is permitted, the hardship is the uniqueness of the lot and where an expansion can be placed, construction on the 297 lot feasible because its environmental cap. The expansion has been reduced in size from 16,000 to 7,600 square foot one story addition and its shape conforms to the rear setback which doesn't require relief. The flat roof respects the residential neighbors and a variance is being required for the

curb cuts only. Webb would like to expand their business and remain in Salem. Atty. Correnti requests a continuance to provide lighting.

Acting Chair/Vice-Chair Copelas – asked if there was Memorandum of Understanding. Atty. Correnti replied yes, it can be obtained from the City Clerk.

Schaeffer noted that the statute of the P&S Agreement and its requirements are unknown to the BOA and not within their purview. The City Clerk will know the timing in relation to the zoning change and all other relevant information.

Acting Chair/Vice-Chair Copelas states that the public comment will remain open.

Motion and Vote: Mr. Duffy makes a motion to continue the public hearing to the next regularly scheduled meeting on May 17, 2017. The motion is seconded by Mr. Tsitsinos. The vote was unanimous with five (5) (Peter A. Copelas (Acting Chair/Vice-Chair), Paul Viccica, Tom Watkins, Mike Duffy, and Jimmy Tsitsinos in favor and none (0) opposed.



Project	A public hearing for a petition of, requesting a Special Permit per <i>Sec. 3.3.3 Nonconforming Structures</i> , and a Variance per <i>Sec. 5.1.8 Table of Required Parking Spaces</i> of the Salem Zoning Ordinance, to allow the petitioner to extend a nonconforming structure and provide (4) parking spaces (5 required).
Applicant	JUNIPER 89 BRIDGE STREET LLC
Location	89 BRIDGE STREET (Map 36, Lot 374)(B-1 ECOD Zoning Districts)

Documents and Exhibitions

- Application dated March 29, 2017 and supporting documentation

*There is the appearance of a conflict of interest and Mr. Tsitsinos will recuse himself for the petition of Juniper 89 Bridge Street LLC

Attorney Kristin Kolick of 63 Federal Street, represents the applicant.

Other presenters include:

- Ryan McShera, Red Barn Architecture (Architect)

Atty. Kolick stated that the middle building between two newly renovated condominium structures was recently purchased by the applicant/applicant and he would like to renovate the two family building, add a rear addition, and provide parking at the rear which the

building currently does not have. The new parking entrance would be off of Barton Street to access the three properties and two additional spaces would be added outside of the lot line, both instances would require a cross easement for the three properties. The structure is nonconforming as to height and the proposal is to continue the existing dormers to provide head room for the top floor unit.

McShera (Architect) stated that the L shaped rear addition would extend connect the series of third floor dormers and gable end. The second floor addition would create a better second floor layout, extend an interior stair for third floor access, and would be in line with the existing face of the building along the side and rear and would cantilever over the first floor. One of the four proposed parking spaces would be below that overhang.

Acting Chair/Vice-Chair Copelas – asked how many bedrooms would be in the units. McShera replied three.

Mr. Viccica – asked for the hardship to be clarified. Atty. Kolick replied the shape of the lot, the placement of the existing structure, and the desire of the developer for rear vehicular access.

Mr. Duffy – asked if an easement was in place yet? Atty. Kolick replied no. There is a curb cut to the right side of the building that 89 Bridge Street has an easement to access to rear lot.

Acting Chair/Vice-Chair Copelas – noted that 14 spaces are proposed and asked if those spaces would meet the requirements for all three buildings. Atty. Kolick replied yes. There are 3 units in 89 Bridge Street, 4 units in 87 Bridge Street, 4 units in 93-95 Bridge Street, and 1 unit in 91 Bridge Street.

Acting Chair/Vice-Chair Copelas opens public comment.

Patrick Connolly of 93-95 Bridge Street. In favor of the renovation and proposed parking.

Karen Crosby of 93-95 Bridge Street. In favor of the renovation and proposed parking.

St. Pierre – noted that Sec. 3.3.4 states that a variance is not required accept for 1 and 2 family homes. The existing two units are grandfathered with no parking and would only need parking of for the additional third floor unit, not the entire building. Only a special permit would be required. St. Pierre suggests that the petitioner and council discuss the in private.

Motion and Vote: Mr. Duffy makes a motion to suspend this discussion and allow the petitioner to speak with his council. The motion is seconded by Mr. Watkins. The vote was unanimous.

Acting Chair/Vice-Chair Copelas reconvenes the discussion.

Atty. Kolick stated that they would like to withdrawal the request for a variance for additional parking spaces. St. Pierre – stated that if this project were new construction parking for all of the proposed units would need to be provided. Because the building is grandfathered with no parking, only parking for the new third floor unit is required. 1.5 spaces per unit are required and the proposed 4 exceed the requirement. The granting of a special permit can be conditional upon the applicant obtaining a cross easement.

Acting Chair/Vice-Chair Copelas - reads letters from Ryan & Holly Lilly of 87 Bridge Street, Mathew Digiovanni & Elizabeth Field of 87 Bridge Street, Karen Crosby of 93-95 Bridge Street, Margo Paranzino of 93-95 Bridge Street, Patrick & Blair McCafferty of 93-95 Bridge Street, Andrew French & Patrick Connolly of 93-95 Bridge Street, Anna Endoznodder of 91 Bridge Street, and Gail Assiovati of 4 Barton Street, who are all in support of the requested relief.

Acting Chair/Vice-Chair Copelas closes public comment.

Mr. Duffy – stated that the change is not more detrimental to the neighborhood and an easement will allow the parking at the rear. This will add previously non-existent parking

Motion and Vote: Mr. Viccica makes a motion to approve the application for a requesting a Special Permit per *Sec. 3.3.3 Nonconforming Structures* to allow the petitioner to extend a nonconforming structure with the condition that an easement off of Barton Street be obtained prior to a building permit. The motion is seconded by Mr. Watkins. The vote was unanimous with four (4) (Peter A. Copelas (Acting Chair/Vice-Chair), Paul Viccica, Tom Watkins, and Mike Duffy, in favor and none (0) opposed.

APPROVAL OF MEETING MINUTES

Motion and Vote: Mr. Watkins makes a motion to approve the March 15, 2017 minutes. Seconded by Mr. Duffy. The vote was unanimous with five (5) in favor and none (0) opposed.

OLD/NEW BUSINESS

None

ADJOURNMENT

Motion and Vote: Mr. Duffy made a motion to adjourn the April 19, 2017 regular meeting of the Salem Board of Appeals, seconded by Mr. Watkins, and the vote was unanimous with five (5) in favor and none (0) opposed.

The meeting ends at 9:30 PM.

For actions where the decisions have not been fully written into these minutes, copies of the decisions have been posted separately by address or project at:
http://saalem.com/Pages/SalemMA_ZoningAppealsMin/

Respectfully submitted,
Erin Schaeffer, Staff Planner