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DEPT. OF PLANNING &  
COMMUNITY DEVELOPMENT

8 November 2011

**To** Consulting Party

**From** Paul Silverstone, Environmental Officer, Massachusetts Housing Finance Agency (MassHousing), acting on behalf of Massachusetts Department of Housing and Community Development (DHCD) as the Agency Official's Designee under a Memorandum of Agreement dated August 1, 2011

**Regarding** St. Joseph's Redevelopment, located at 135 Lafayette Street, Salem, MA

Thank you for your consultation thus far on the Section 106 review of proposed redevelopment of the St. Joseph's site in Salem. Please find enclosed:

- Memorandum Documenting DHCD's Consideration of Means to Avoid or Minimize Effects on Historic Properties
- Text of a legal notice announcing determination and inviting input on Memorandum of Agreement stipulations that is to be published in *The Salem News* on 11 November 2011.



NOTICE OF DETERMINATION REGARDING FINDINGS AND MITIGATION OF ADVERSE  
EFFECTS UNDER SECTION 106 OF NATIONAL HISTORIC PRESERVATION ACT

11 November 2011  
Massachusetts Dept of Housing and Community Development  
100 Cambridge Street  
Boston, MA 02114  
617-573-1300

Department of Housing and Community Development (“DHCD”) intends to request release of HOME funds under Title II of the HOME Investment Partnerships Act (PL-101-625), to assist in the financing of residential housing at a Project known as St. Joseph’s Redevelopment at 135 Lafayette Street in Salem, Massachusetts. In consideration of pending release of such funds, together with the Massachusetts Historic Commission (acting as the State Historic Preservation Officer or SHPO), MassHousing (acting as DHCD’s Agency Official Designee) and other consulting parties, DHCD, by and through MassHousing, has conducted review and consultation regarding the resolution of “adverse effects” of the Project on properties eligible for listing on the National Register of Historic Places (NRHP), pursuant to Section 106 of the National Historic Preservation Act, 16 U.S.C. § 470f, and its implementing regulations.

DHCD has reviewed the information provided to date as a result of the Section 106 consultation process to determine whether there are feasible means available to avoid or minimize adverse effects in connection with the Project. DHCD hereby makes the determination that the only alternatives that would avoid all adverse effects on the subject historic properties are not feasible. In addition, DHCD has evaluated whether the Applicant could pursue modifications to the Project plans that would significantly minimize adverse effects, without making the Project infeasible for its proposed purpose, or for delay, economic or other reasons. Based upon consideration of information provided by the Applicant and other consulting parties, DHCD hereby determines that such modifications would provide no appreciable avoidance or minimization of the Project’s adverse effects on historic properties and also would not be feasible given the physical, programmatic and economic constraints of the Project. Therefore, DHCD has determined that the only viable approach to resolving the Project’s adverse effects on historic properties is via mitigation of those effects through a Memorandum of Agreement between DHCD and the SHPO, with concurrence from the Applicant and other consulting parties that seek to join.

This notice is intended to provide an opportunity for members of the public to submit comments and suggestions regarding potential stipulations of an Agreement intended to mitigate adverse effect of the Project to such extent as may be feasible. Such comments and suggestions sent via email to Paul Silverstone of MassHousing at [psilverstone@masshousing.com](mailto:psilverstone@masshousing.com) prior to 18 November 2011 will be considered in development of a Memorandum of Agreement.

Catherine Racer  
Associate Director, Housing Development, DHCD



**MEMORANDUM DOCUMENTING DHCD'S CONSIDERATION OF  
MEANS TO AVOID OR MINIMIZE ADVERSE EFFECTS ON HISTORIC PROPERTIES**

TO: Consulting Parties (see attached distribution list)

FROM: Massachusetts Housing Finance Agency ("MH"), acting on behalf of the  
Massachusetts Department of Housing and Community Development as the Agency  
Official's Designee under a Memorandum of Agreement dated August 1, 2011

DATE: 8 November 2011

SUBJECT: St. Joseph's Redevelopment  
Salem, Massachusetts  
DHCD # db1671  
MHC # RC47465

The purpose of this Memorandum is to document consideration by the Massachusetts Department of Housing and Community Development ("DHCD"), in connection with the above referenced project (the "Project"), of means to avoid or minimize adverse effects on historic properties, as required under Section 106 of the National Historic Preservation Act ("Section 106") and its regulations found at 36 CFR Part 800. In producing this Memorandum, DHCD is acting as Responsible Entity for the U. S. Department of Housing and Urban Development ("HUD") under a delegation authorized under 12 U.S.C. § 1715z-22(c)(9) and pursuant to regulations found at 24 CFR Part 58.

**I. SUMMARY OF CONSIDERATIONS**

MH and DHCD have reviewed the information provided to date as a result of the Section 106 consultation process to determine whether there are feasible means available to avoid or minimize adverse effects in connection with the Project. DHCD hereby makes the determination that the only alternatives that would avoid all adverse effects on the subject historic properties are not feasible.

In addition, MH and DHCD have evaluated whether the Planning Office for Urban Affairs, a private non-profit entity (the "Applicant"), could pursue modifications to the Project plans that would significantly minimize adverse effects, without making the Project infeasible for its proposed purpose, or for delay, economic or other reasons. Based upon consideration of information provided by the Applicant and other consulting parties, DHCD hereby determines that such modifications would provide no appreciable avoidance or minimization of the Project's adverse effects on historic properties and also would not be feasible given the physical, programmatic and economic constraints of the Project. Therefore, DHCD has determined that the only viable approach to resolving the Project's adverse effects on historic properties is via mitigation of those effects through a Memorandum of Agreement between DHCD and the SHPO, with concurrence from the Applicant and other consulting parties that seek to join.

## **II. BACKGROUND**

### **A. Project and Funding**

The existing Project site is a 2.7-acre parcel that contains paved areas, landscaped areas and four buildings: a church, rectory, school and convent; none of which are being used at this time. Project plans propose demolition of the church and rectory buildings and construction of a 51-unit multifamily affordable housing development, all of which will be reserved for households earning at or below sixty percent (60%) of area median income. The Project also includes approximately 4,150 square feet of area for neighborhood-serving commercial space and approximately 750 square feet of community space as well as new parking and outdoor space.

In order to finance the rental portion of the Project, its owner, Salem Lafayette Development, LLC has been conditionally awarded HOME Funds by DHCD, the City of Salem and the North Shore HOME Consortium, Section 8 Project-Based Vouchers ("PBVs"), as well as various sources of state funds.

Because of its participation in the HOME Program and award of PBVs, the Project is subject to HUD environmental review, including compliance with NEPA and related laws, including Section 106 of the National Historic Preservation Act and the regulations found at 36 CFR Part 800. DHCD and the North Shore HOME Consortium (acting on behalf of itself and the City of Salem with respect to Salem's allocation of HOME Funds) have agreed that DHCD has acted, is acting, and will act as "lead agency" pursuant to 36 CFR 800.2(2), to fulfill both DHCD's and the North Shore HOME Consortium's respective obligations under Section 106 with respect to the Project in a consolidated manner.

### **B. Historic Properties Affected**

The church building is the third church located at this site, constructed in 1949-50. It is not the original building or reflective of reconstruction following the Salem Fire of 1914, but it may be considered representative of a religious/cultural heritage dating to the construction of the original 1880's church and is constructed over the foundation of its predecessor building. It can be considered an example of an architect-designed building of a coherent International Style that is uncommon in the local area.

The existing rectory is an historic result of post-Fire reconstruction, constructed in 1917. Architecturally, it is an intact example of the Late Gothic Revival Style of its times and has fine Arts & Crafts interior details.

The school was constructed in 1921 and is an eclectic combination of Late Classic Revival and Paneled Brick Styles with much of its interior plan and original features intact. While windows and doors are no longer original, it is a good example of school buildings of its era.

While the specific characteristics of the existing convent building may not meet historic criteria, it (a) has a use that has been associated with the church site since at least 1906 and, (b) along

with the rectory and school, contributes to the northern definition of the site along Harbor Street. As such, it is a building contributing to an area that is eligible for listing in the National and State Registers of Historic Places as an historic district.

There is sufficient indication that a concrete statue of St. Joseph was buried on the site to merit confirmatory investigation if its suspected general location is in an area that may be disturbed by Project activities.

The overall site occupied by the four former parish buildings as an aggregate group is eligible for listing in the National and State Registers of Historic Places as an historic district at the local level. In addition to having longstanding religious and cultural significance, at least three of the buildings are reflective of local history and/or are of architectural significance.

#### C. Area of Potential Effect ("APE")

A 2006 *Point Neighborhood Historic Resources Survey and Preservation Plan* recommended that the neighborhood surrounding the church property be considered eligible for listing on the basis of its (Criterion A) neighborhood restoration after the Great Salem Fire of 1914 and its (Criterion C) stock of buildings that reflect the economic and social conditions of its then largely French-Canadian community; with a period of significance of 1914-1956. Since this recommendation is consistent with that of the SHPO, the Point Neighborhood may be considered eligible for listing in the NHRP as an historic district. The bounds of the Point Neighborhood, as defined in the *Point Neighborhood Historic Resources Survey and Preservation Plan*, extend at least several blocks beyond the Project site in each direction and are considered to define the APE.

#### D. Adverse Effect of Project

Completion of the Project would require demolition of the church and convent buildings; resulting in an adverse effect on those two buildings, the aggregate former parish campus and the APE (Point Neighborhood District).

### **III. CONSULTATION PROCESS**

DHCD was authorized to act as Agency Official to complete the Section 106 Process and, pursuant to a Memorandum of Agreement dated August 1, 2011, appointed MassHousing as its Designee. MassHousing, which has more experience in completing the Section 106 Process, has assisted DHCD with respect to the Project.

DHCD commenced the Section 106 consultation process with the goal of determining what appropriate means have been considered or may be considered to avoid, minimize or mitigate adverse effects of the Project on historic properties. Several sources were considered in evaluating historic criteria and effects of the proposed Project that include: reconnaissance of the site and surrounding area, consultation with SHPO, consultation with municipality and its historic commission (Salem Historical Commission, "SHC"), opinions and information provided

by individuals and representatives of the public, information supplied by the Applicant, consultation with an organization of demonstrated historical interest (Historic Salem, Inc., "HSI") and review of reports by professional consultants (Crosswhite Property Advisors 2005, Tremont Preservation Services 2005, VHB/Vanasse Hangen Brustlin 2006).

As background inquiry, MH and DHCD have reviewed all information provided regarding the Project upon initiating review. Such information indicated that, prior to initiation of the Section 106 review:

- The St. Joseph's Parish church and associated buildings closed in August 2004 and were purchased by the Applicant in June 2005.
- Following acquisition, the Applicant (a) held several meetings with municipal bodies, neighborhood groups and historic organizations to solicit input regarding a property redevelopment plan, (b) pursued parties identified by local residents, HSI and a real estate consultant for possible reuse of the former church building in a manner that might avoid or minimize adverse effect and (c) evaluated architectural, structural and financial consequences and feasibility of adaptive reuse of the church building.
- A *St. Joseph's Parcel Reuse Study* ("Parcel Reuse Study") prepared by an independent third party consultant was commissioned by the City of Salem in 2005, which indicated that (a) housing is the both the recommended and market-supported use of the parcel and that (b) probable private redevelopment would probably include higher density and demolition of the rectory building.
- A report regarding historical and architectural significance was produced in 2005.
- A 2005 structural investigation and analysis of all buildings was prepared by Structures North Consulting Engineers, Inc.
- A *Point Neighborhood Historic Resources and Preservation Plan* was produced in 2006.
- Presentation of an initial site plan showing a new apartment building proposed to be constructed at the location of the former church structure was presented and reviewed by municipal bodies and the neighborhood public between the winter and summer of 2006.
- A demolition delay for Salem Historical Commission ("SHC") review occurred during 2006-2007.
- Municipal permitting, delays, appeals, reviews and approvals were ongoing during 2007 and 2008.
- Revisions to the initially presented building design were made in response to input from the Salem Zoning Board of Appeals, the Salem Planning Board and public comment following the Applicant's success in land use litigation.

Subsequent to initiation of Section 106 review:

7/25/2011: MH and DHCD visited the site to observe the parcel, building exteriors and some building interiors. Other participants: Representatives of the SHPO, the Applicant, the North Shore Home Consortium and the City of Salem.

8/2/2011: Based on materials received to date, MH and DHCD mailed a finding of "adverse effect" and invitation to consult/participate to SHPO, THPOs and ACHP. Responses were received 8/23/2011 and 8/19/2011, respectively.



8/4/2011: MH and DHCD sent invitation to participate as an additional consulting party to SHC, City of Salem, HSI and the North Shore HOME Consortium. All accepted. Some provided information and/or comment.

8/5/2011: MH and DHCD published legal notice in *The Salem News* announcing a finding of adverse effect, availability of documents for public examination, and invitation for public comments and views. A copy of the legal notice was also directly mailed in advance to parties of expressed or identified interest as known at the time. Comments were reviewed from public and consulting parties and additional requests to be considered "interested parties" were received following publication.

8/17/2011: MH attended and participated in a public meeting held by SHC regarding SHC agenda item "135 Lafayette Street (St. Joseph's Redevelopment) – Review and comment on submission (Section 106 Review)".

8/19/2011: MH and DHCD published legal notice in *The Salem News* announcing a public meeting on 9/6/2011 with availability of documents for public examination. The public was additionally informed of the meeting via local electronic and printed media. A copy of the legal notice was also directly mailed in advance to an expanded number of parties of expressed or identified interest as known at the time.

9/6/2011: MH participated in reconnaissance of the Point Neighborhood, APE and surrounding area.

9/6/2011: MH conducted a public meeting that included description and discussion regarding the proposed Project, Section 106 review, NRHP eligibility, APE, adverse effects, considerations and options to avoid, minimize and/or mitigate adverse effects, and widely ranging views and opinions of over 90 members of the public in attendance. Additional written comment and response were reviewed from and by public and consulting parties during the following weeks.

9/21/2011: MH and DCHD mailed an update of comments, questions, information and related materials received to all consulting parties and to ACHP.

10/4/2011: MH and DHCD hosted a meeting of consulting parties. Prior and current options and alternatives were discussed. An alternate re-use plan for the former church building was presented for comparison and evaluation.

10/17/2011: MH and DHCD hosted a follow-up meeting of consulting parties. Evaluation of the alternate re-use plan presented on 10/4 and re-evaluation of the previous re-use plan found both to result in adverse effect and neither to be financially viable. Evaluation of other information following the previous consulting parties meeting did not present other means of avoiding or minimizing adverse effects.

Because the public and all Consulting Parties have been informed and have exercised opportunities to provide input through the Section 106 consultation process on avoiding or minimizing adverse effects on historic properties as described above, MH and DHCD believe that it is appropriate to make final determinations based on the information received to date, as follows.

#### **IV. DISCUSSION**

As a threshold matter, this Section 106 review and consultation comes at a late stage of the development process. While that has potential to impose certain limitations on options to avoid or minimize adverse effects on historic properties, options and alternatives had been examined in preceding years. The Applicant has also stated that, at substantial cost to the Applicant, the Project's schematic design has been completed and it has obtained the full complement of reviews, zoning and permitting from local, state, and federal authorities. The Applicant has also purchased and maintained the Project site and secured financial commitments from lenders, including DHCD and other agencies or entities, based on the Project's current design and regulatory approvals.

That notwithstanding, MH and DHCD reviewed both previous and current options and efforts to avoid or minimize adverse effects and explored new options suggested during the Section 106 process. Since no action is currently planned regarding the school and rectory buildings and the convent building is a contributing structure to the integrity of the district eligible for listing that is comprised of all four buildings, the following discussion primarily addresses considerations regarding the former church building.

##### **A. Options to Avoid Adverse Effects on Historic Properties**

Completed considerations of a feasible reuse that might avoid demolition, require minimal alteration to the buildings, conform to Secretary of the Interior's Standards for Historic Rehabilitation or otherwise preserve attributes that maintain eligibility for listing in the NRHP were unsuccessful but included:

A Parcel Reuse Study that identified potential ways in which the existing buildings might be reutilized. Results of the Parcel Reuse Study found that it would be extremely difficult to avoid the removal of the former church structure in any redevelopment scenario. The Parcel Reuse Study also notes that the former church has limitations for reuse that include both structural difficulties and lack of market-supported use. Invoking "an urban design and development efficiency perspective," the Parcel Reuse Study stated that "it would be desirable to complete the street wall along Lafayette Street from Dow to Harbor with a single structure of uniform height", which would require demolition of the church and the rectory. The City of Salem has stated that, if the Project does not proceed, the most likely use would then be by a for-profit developer that would demolish all of the buildings, leaving none of the historical fabric intact, and the development would include some form of traffic-intensive retail.

Meetings with neighborhood residents and civic organizations to identify their property reutilization preferences.

Specific effort to preserve the church as an assembly, performance or arts space. All parties that were suggested as potentially interested in retaining and reusing the former church were contacted by the Applicant, but none expressed interest in doing so.

A real estate broker sought potential buyers of the church that might be interested in retaining the former church to reuse the building for other purposes with minimal modification to it. According to the Applicant, solicited parties included developers, other churches, charter schools, performing arts groups and Boys & Girls Clubs; but no interested parties were found.

Consideration of possible further continuation of the above efforts found that:

In addition to the deleterious effects of vandalism, the church's physical integrity has been professionally assessed and is known to have existing problems that continue to deteriorate, including deep vertical cracks in every vertical corner of the building, stress lines and horizontal cracks in long stretches of the walls, thermal cracks in some of the walls, a cracked and fragmented chimney and rusting steel structure within the tower.

Criminal activity at the former church site and neighborhood has increased, to the detriment of residents of the neighborhood and broader community; a condition that is undesirable to persist.

Further delay may result in the applicant selling the property. As noted in the City Study conclusion, the most likely redevelopment would then be by a for-profit developer that is likely to demolish all of the buildings, leaving none of the historical fabric intact. The Applicant has incurred approximately \$4.7 million in acquisition, maintenance and predevelopment costs to date. This is a high investment by any developer, particularly a non-profit. The Applicant has spent nearly a half million dollars to care for the property since acquisition, including full payment of real estate taxes, utilities, landscaping, snow removal, security, fire alarms, environmental remediation and general maintenance. The applicant appears unable to extend that effort.

#### **B. Options to Minimize Adverse Effects on Historic Properties**

As noted above, other users and uses of the property were pursued with hope that at least one might have been able to reuse the building(s) with no or minimal adverse effect. However, none proved to be feasible.

Rental housing is the site redevelopment use that was both community and market-supported. In recognition of the social and cultural value of the former church property as well as its eligibility for listing in the National and State Registers of Historic Places, both previous and current

options for renovation of the church building to create housing were reevaluated via review of conceptual plan options from two architects and contractor pricing.

Both options for renovation of the church building for adaptive residential reuse demonstrated that such renovation would (a) remove most, if not all, of building interior features, (b) add approximately 70% more windows, (c) remove some façade features, (d) include other exterior demolition and addition, (e) probably require change to roof form, (f) use all new windows of non-original type and style (g) require reconstruction of large portions of the exterior wall and (f) lower the surface grading that surrounds much of the building and its foundation. Reevaluation of these individual and cumulative consequences of renovation showed that such renovation would result in multiple and significant adverse effects to the historic property. While such renovation appears likely to remove several of the building's physical characteristics of eligibility for listing in the National Register of Historic Places, its cost was also found to be in excess of budgetary provisions.

Due to its configuration and structural system, the most feasible potential reuse of the convent building would be as a form of single-room residence such as transitional housing or a hostel, for examples. However, this type of use is not supported by the community. In addition, the four-building campus would lose definition with the loss of the church building's eligibility and the convent would no longer be a contributing structure regarding the ability of the campus to be eligible for listing in the National and State Registers of Historic Places as an historic district.

Project plans do not include renovation, demolition or otherwise incur adverse effect to the rectory and school buildings individually.

### Conclusions

As evidenced in the discussion above, DHCD has determined that there are no feasible means to avoid adverse effects of the Project on historic properties. In particular, DHCD believes that the information provided by the Applicant and consulting parties establishes that it would not be feasible to (A) develop the property without adverse effect to the church, its principal structure, or to the convent, or (B) make substantial changes to the Project design that would significantly minimize any adverse effect while remaining feasible. Therefore, DHCD has determined that the only viable approach to resolving the Project's adverse effects on historic properties is via mitigation of those effects through a Memorandum of Agreement.

(end)

## EXHIBIT LIST

<u>Exhibit</u>	<u>Date</u>	<u>Description</u>
A	August 2, 2005	Point Neighborhood Association Meeting Notes including (a) Uses and Ideas Proposed at July 12, 2005 Meeting and (b) Petition supporting POUA's plans.
B	November 2005	St. Joseph's Parcel Reuse Study prepared for the City of Salem Department of Planning and Community Development, prepared by Crosswhite Property Advisors ("Parcel Reuse Study"), including May 10, 2005 Report on Historical Significance prepared by Tremont Preservation Services, prepared for Crosswhite Property Advisors to inform the Parcel Reuse Study.
C	August 3, 2006	Tremont Preservation Services letter to POUA acknowledging the difficulties of reusing the church, and recommending the scale of any new construction at the site.
D	August 2006	Demolition Delay application by POUA to Salem Historical Commission.
E	September 2006	Point Neighborhood Historic Resources Survey and Preservation Plan prepared by VHB/Vanassee Hangen Brustlin, Inc. prepared for City of Salem Department of Planning and Community Development ("VHB Report").
F	June 2008	City of Salem – City Council votes to amend the Salem Zoning Ordinances and Zoning Map to extend the B-5 Central Development District to include the site.
G	December 2009	Project Notification Form submitted to the Massachusetts Historical Commission by POUA.
H	January 12, 2010 [says 2009]	MHC Letter to POUA stating that the Proposed Project will have an adverse effect on the National Register eligible district.
I	September 16, 2010	City of Salem Planning Board Decision granting Site Plan Review/Planned Unit Development to Salem Lafayette Development, LLC for Proposed Project to include a phased mixed-use development with a total of 76 dwelling units (51

in the new building, 17 in the renovated school, and 8 in the renovated rectory), 4560 square feet of commercial space, and 1,000 square foot community center.

J	December 27, 2010 - March 17, 2011	Massachusetts Department of Housing and Community Development awards funding subsidies to the four-story building as the first phase of the Proposed Project.
K	August 2, 2011	Notice of Opportunity for Public Comment Regarding Findings and Resolution of Adverse Effects under Section 106 of NHPA and Availability of Documentation.
L	August 17, 2011	Salem Historical Commission Public Hearing Minutes.
M	August 19, 2011	Letter from ACHP to MH stating that ACHP does not intend to participate in the Section 106 process for the St. Joseph's Redevelopment.
N	August 29, 2011	POUA Letter to P. Silverstone enclosing: <ul style="list-style-type: none"><li>• POUA Memorandum dated August 17, 2011 entitled "Consideration of Alternatives"</li><li>• POUA August 17, 2011 Presentation to Salem Historical Commission</li><li>• March 21, 2005 Structures North Report</li></ul>
O	September 6, 2011	Section 106 Public Meeting – meeting minutes.
P	September 7, 2011	Salem Historical Commission Public Hearing Minutes.
Q	September 15, 2011	The Architectural Team letter supporting architectural analysis of Church.
R	September 21, 2011	P. Silverstone email requesting additional information.
S	October 3, 2011	Letter from POUA to P. Silverstone regarding infeasibility of reusing church building.
T	October 3, 2011	Email from HSI to P. Silverstone with questions.
U	October 4, 2011	Materials distributed at Consulting Parties Meeting: <ul style="list-style-type: none"><li>• HSI Scheme A and Scheme B</li><li>• HSI Memorandum #1</li><li>• HSI Memorandum #2</li><li>• POUA – TAT Plan A1.00 showing Hypothetical Floor Plans and Building Section for church</li></ul>

		<ul style="list-style-type: none"> <li>October 3, 2011 Letter for Odeh Engineers to TAT regarding structural review of church</li> <li>POUA response to P. Silverstone questions</li> </ul>
V	October 4, 2011	DHCD Minutes of Consulting Parties October 4, 2011 Meeting.
W	October 9, 2011	Email from E. Nilsson attaching October 7, 2011 cost estimate and October 6, 2011 letter from Souza, True and Partners regarding structural analysis of church.
X	October 11, 2011	POUA review and analysis of HSI Scheme A, including the following attachments: <ul style="list-style-type: none"> <li>October 11, 2011 Letter from TAT</li> <li>October 3, 2011 Letter from Odeh Engineers</li> <li>October 11, 2011 Letter from Dellbrook Construction regarding construction costs for HSI's Scheme A</li> </ul>
Y	October 16, 2011	HSI Memorandum to B. Loughlin and P. Silverstone regarding HSI Response to POUA October 11, 2011 submission.
Z	October 17, 2011	POUA Memorandum to B. Loughlin and P. Silverstone regarding POUA Response to HSI Memorandum dated October 16, 2011.
AA	October 21, 2011	Memorandum from POUA to P. Silverstone regarding revenue assumptions in POUA's feasibility analysis with attachments, including Salem Condo Sales dated 12/2/10 through 8/30/11; excerpts from Market Study dated August 2010; and excerpts from Appraisal dated May 31, 2011.
BB	Undated	Photographs of existing buildings.
CC	Various Dates	Evolution of Renderings for POUA Proposed Redevelopment.
DD	Various Dates	Letters requesting status as "Consulting Party" or "Interested Party"
EE	Various Dates	Section 106 Comment Letters

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