

APPROVED MEETING MINUTES
Tuesday, October 8, 2019 Meeting | 7:00 p.m.
City Council Chamber, Woburn City Hall, 10 Common Street, Woburn, MA

Chair Dave Edmonds called the meeting to order at 7:00 pm and asked City Planner Karen Smith to call the roll.

Mr. Bob Doherty, Ms. Claudia Bolgen, Mr. Jim Callahan, Mr. Michael Ventresca, Ms. Carolyn Turner, and Chair Dave Edmonds were present. Mr. Kevin Donovan was absent.

Planning Director Tina Cassidy and City Planner Karen Smith were also present and introduced themselves.

Chair Edmonds asked audience to silence all cell phones and also noted the meeting is being recorded.

Chair Edmonds asked Director Cassidy if there were any ANR's and she stated there are none.

PUBLIC HEARING CONTINUED: PROPOSED ZONING TEXT AND MAP AMENDMENTS TO CREATE A "RAILWAY OVERLAY DISTRICT" ("ROD") / Aldermen Gaffney and Tedesco

Cassidy provided an overview of the status of this filing. The Board first opened the public hearing on September 16, 2019 and subsequently scheduled a site visit for September 24th prior to a continuation of the hearing that same evening back at City Hall. Cassidy reminded the Board they voted at the previous meeting to send a letter to the City Council asking councilors if they would be willing to have a joint meeting to discuss some of the issues and questions that had come up at the first public hearing. The Board received a response from the City Council in the form of a memo from the City Clerk stating that Chapter 40A requires the Board to file a written recommendation with the City Council and it (the Council) had determined that a meeting with the Planning Board was not necessary.

Cassidy stated that a Planning Board member was forward thinking at the previous meeting and asked her to prepare a robust recommendation suitable for the Planning Board's adoption this evening in the event the Council declined a joint meeting. She stated she will be prepared to do that this evening.

PUBLIC HEARING

Chair Edmonds opened the public hearing and asked if any audience members would like to speak for or against this proposal.

Attorney Joseph Tarby of Murtha Cullina, 600 Unicorn Park, Woburn, MA representing 8-10 Green Street LLC, which is one of the property owners in the proposed Railway Overlay District, reviewed some of the issues that were raised at the last meeting and site visit. Tarby noted his client has a revised PowerPoint presentation that shows a new proposed boundary line for the Overlay District in addition to slides that will show the result of measuring the heights of the all buildings on Main Street on the St. Charles side as well as the property observed during the site visit that was not included within the Overlay District.

Attorney Tarby stated the site visit conducted by the Planning Board was beneficial. He noted due to the environmental cleanup that needs to occur on the site, additional density is needed as the cleanup will result in an additional expense. Tarby stated his clients are suggesting reducing the height of the project from 49 feet to 46 feet and removing the properties along Main Street from the proposed Overlay District if there is

a future concern of four-story buildings along Main Street. Tarby noted this proposal encourages upgrading of properties and provides affordable housing that is close to public transportation, downtown businesses, etc.

Mark Sleger of Alan Engineering asked to present copies of his presentation to the Board.

Motion to accept the document made by Bolgen;
Seconded by Callahan;
Motion carried 6-0.

Sleger presented his overhead slides showing a revision of the proposal with the exclusion of Main Street properties in addition to photos and a summary of building heights along with their locations.

Ken Lee of 58-60 Prospect Street, Woburn, MA stated, in reference to the proposed Overlay District, the importance of not only the height of the buildings in the surrounding area, but also the number of stories. Lee feels the proposed Railway Overlay District is a mixed bag of picking and choosing between the R and the S1 Districts and it is being proposed to support a specific development. Lee stated the people of Woburn should be able to rely on appointed and elected officials to represent the residents regardless if they are able to attend the meetings or not. Lee also asked Cassidy to clarify the meaning of a robust recommendation.

Tarby stated the purpose of the proposed district, as submitted by Alderman Gaffney and Tedesco, is *“To promote the health, safety and general welfare of the community by encouraging the redevelopment of abandoned, underutilized, and/or obsolete commercial and industrial sites to residential use”* and added that his client’s proposal more than meets this purpose. Tarby further stated the existing zoning in the area has been in effect for over 35 years; the current buildings contain asbestos; and noted part of the problem of redeveloping those properties is the expense due to the involvement of environmental cleanup.

Tarby noted the second purpose of the proposed district is *“To promote high quality design and minimize negative impacts on the surrounding area,”* and said the city is better off having housing at that location versus the single-story industrial uses that are currently being operated on the site.

Edmonds asked if there were any other members of the public who wished to speak during the hearing. There were none.

Motion to close the public hearing made by Bolgen;
Seconded by Doherty;
Motion carried, 6-0.

Cassidy read the draft recommendation letter into the record as follows:

Dear Council:

The Planning Board thanks the Council for considering its request for a joint meeting (memo received by the Board is attached as Attachment A). The ROD-related zoning changes raise more than a handful of questions on a range of issues, from big-picture matters to technical details of the proposed ordinance’s “mechanics”. In order to discharge its responsibility to most effectively assist the Council with this complex issue, the Planning Board suggested the meeting. In lieu of a joint meeting and in accordance with M.G.L. Chapter 40A, Section 5, please accept this communication as the Board’s best effort to assist the Council with a comprehensive written recommendation.

PURPOSES AND INTENT OF THE PROPOSED AMENDMENT

1. *The reason(s) for creating the proposed new overlay is unclear. Is it being created to encourage "...the redevelopment of abandoned, underutilized, and/or obsolete commercial and industrial sites to residential use" as the text says, or is it being proposed to facilitate redevelopment of a particular lot, as shown on the plans in Attachment B which were submitted to the Council at its September 19, 2019 meeting?*

If the intent of the ROD is in fact correctly stated in the text, the Board recommends the Council either focus the rezoning on the industrially-zoned lots to the south or at least consider them along with the lots currently under discussion. The area to the immediate south of the proposed ROD district is zoned IG and overlain with the Woburn Loop Bikeway Greenway Overlay District (WLBGOD); see the map in Attachment C. The suggestion to include the abutting IG/WLBGOD area in the on-going rezoning deliberation is made for two reasons.

One, the lots in the WLBGOD district appear identical in character to those in the proposed ROD in terms of lot sizes and characteristics, existing and historic land uses, and probable site environmental conditions and remediation requirements. Both areas rely on the same public infrastructure, abut the same streets and former railroad right-of-way, and are next to a single- and two-family residential district.

Two, the need to incentivize residential redevelopment in the IG/WLBGOD area may be greater than the need to do so for the lots in the proposed ROD. Residential development is already allowed in both areas; the proposed ROD lots are zoned S-1 which allows residential uses by special permit at a density of 14 units per acre under existing zoning. The proposed rezoning would nearly double the maximum permitted density to 25 units per acre. This contrasts sharply with the allowed density in the WLBGOD, where only 7 units per acre are currently possible. If there is in fact a need or desire to incentivize residential redevelopment of the industrial lots on the outskirts of downtown, it would seem rezoning the abutting IG area to S-1, or to a ROD, might be equally worthy of consideration.

The draft ordinance lists a second purpose, which is "To promote high quality design and minimize negative impacts on the surrounding area." The Board found no provisions in the proposed ROD text that would define, promote or encourage high quality design, or ensure the use of high-quality construction materials for example. Similarly, there are no provisions in the draft text to minimize the negative impacts on the surrounding area, particularly the residential neighborhood on Prospect Street. While some development impacts may be addressed by the City's mitigation ordinance, the visual impacts of nearly 50' tall buildings without buffers and within 25' of some abutters will be significant.

2. *Increasing the allowable density of units per acre from 14 to 25 will significantly increase the number of potential dwelling units on the proposed ROD lots from 118 to 210. Can this area of the City support development of this intensity in terms of providing the public infrastructure needed to sustain it? Will the resulting traffic be bearable? Does the Council have any concerns about encouraging the owners of commercial buildings along Main Street to replace them with four story multi-family dwellings? The proposed ROD would make it possible for them to do so. Are there any concerns about the visual impact 49' tall buildings would have on the streetscape whether directly on the sidewalk or on lots behind the former railroad right of way? Should design guidelines or standards be in place to guide new development?*
3. *To the Planning Board's knowledge, no information or argument has been advanced to suggest redevelopment of the lots requires the zoning relief the ROD proposal reflects. Assuming residential*

reuse is preferred by the Council, why isn't the current zoning and density sufficient to support redevelopment of the 8-10 Green Street site and the other lots proposed for inclusion in the ROD? Are there conditions here that require a doubling of density to effect redevelopment? Is there something that distinguishes the lots in the proposed ROD from those in the IG/WLBGOD zone to the south?

IMPACT OF PROPOSED AMENDMENT IN THE LONGER TERM

1. Rezoning this area could set a precedent or perhaps establish an incentive for other property owners nearby to request inclusion in the overlay. The aforementioned 45 to 50-acre IG/WLBGOD zoning district just south of the proposed overlay, between Green Street and the Winchester town line, currently has the option for residential development at the rate of seven (7) units per acre. If the City creates the ROD, owners of land in the IG/WLBGOD district might be expected to request their lots be rezoned to ROD. Given the current value of residential developments versus industrial land uses and what would be a near quadrupling of the number of possible dwelling units, it is a likelihood. If the Council says yes to 25 units per acre for the proposed ROD area, on what basis would it say no to the owners of land literally immediately across the street?
2. The proposed ROD will authorize a housing density equal to that allowed near the Anderson/Woburn Regional Transit Center and greater than that permitted at the Woburn Mall. If the City wants the industrial uses in the area near Main Street including those in the WLBGOD district to be replaced with housing at a density of this magnitude, a significant amount of advanced planning would seem to be necessary to accommodate it. A summary of possible unit counts is provided as Attachment D. For example, the streets near the proposed Overlay District are unlikely to provide equal or better access to mass transit than does Commerce Way to Anderson/Woburn Regional Transit Center or provide more direct access to highways in order to reduce traffic impacts on local roads. Should the City pursue acquisition and build-out of the former railroad right-of-way as an access road for the cars, pedestrians and bicyclists that new development of this scale would bring?

OTHER QUESTIONS AND ISSUES RELATED TO THE PROPOSED BOUNDARIES FOR THE ROD

1. The map included with the zoning petition has at least one confusing aspect to it. To be clear, the lots that would be rezoned by the pending petition are the following (City of Woburn Assessors Map identification in parentheses):

<i>275 Main St. (Map 51, Block 27, Lot 16)</i>	<i>269a Main St. (Map 51, Block 27, Lot 17)</i>
<i>263 Main St. (Map 51, Block 27, Lot 18)</i>	<i>257 Main St. (Map 51, Block 27, Lot 19)</i>
<i>253 Main St. (Map 51, Block 27, Lot 20)</i>	<i>245 Main St. (Map 51, Block 27, Lot 21)</i>
<i>243 Main St. (Map 51, Block 27, Lot 22)</i>	<i>8 Green St. (Map 59, Block 4, Lot 5)</i>
<i>29 High St. (Map 51, Block 27, Lot 11)</i>	
<i>S-1 zoned portion of 239-241 Main St. (Map 59, Block 04, Lot 1)</i>	
<i>Unnumbered lot at Main and High Streets (Map 51, Block 27, Lot 15)</i>	
<i>Unnumbered lot on Green St. (Map 59, Block 4, Lot 4)</i>	
<i>Unnumbered parcel containing part of former railroad right-of way, between High and Main Sts.</i>	

The zoning petition and attachment do not reflect this more comprehensive list above. In particular, the parcels in italics above were not mentioned in the Petition or included in the Council's legal notice but Planning staff subsequently confirmed with the attorney for the 8- 10 Street property owners that the omissions were oversights.

2. *The proposed rezoning would leave several “islands” of S-1 Zoning District in place without the ROD overlay. More particularly, three lots that are either in the center of the area to be rezoned or on the periphery of the area to be rezoned have been omitted from the proposed map amendment. Specifically, lots at 31 High Street (Map 51, Block 27, Lot 10), 35 Prospect Street (Map 51, Block 27, Lot 08), and 47 Prospect Street Rear (Map 51, Block 27, Lot 23) would remain zoned S-1 but would not be included in the overlay. There does not seem to be a logical planning argument for leaving them out.*
3. *The proposed Overlay District uses a combination of lot lines and zoning lines as boundaries and excludes some lots (such as 31 High Street and the one at the corner of Main and Green Streets) without apparent rationale. To the extent possible, streets should be used as boundary lines instead of lot lines or historic zoning district boundary lines.*

OTHER QUESTIONS AND ISSUES ABOUT PROPOSED TEXT FOR THE ROD

1. *The proposed ordinance states that the overlay permits residential land uses not allowed in the underlying district, but this is mostly inaccurate. Three of the four proposed special permit uses (elevator apartment, congregate elderly and townhouse apartments) are already allowed by special permit in the underlying S-1 zoning district. The newly-added use would be garden apartments, but the Board suggests adding that use would be unnecessary, since new buildings over 2 stories are virtually guaranteed to have an elevator by State Building Code and would therefore be permitted as elevator apartments. Also, it is unlikely a developer will “underbuild” by constructing two-story buildings where 4.5 stories would be permitted.*
2. *The proposed zoning text is inadequate as drafted and in need of revision/elaboration. At a minimum:*
 - a. *It does not follow the same formatting as the rest of the zoning ordinance, either in terms of numbering or titling of subsections;*
 - b. *Customary and/or required provisions about such matters as signage and parking design standards are not included; and*
 - c. *References to the applicability of other sections of the WZO, including but not limited to special permits, groundwater protection and floodway and flood plain districts, are missing.*
3. *The proposed zoning ordinance would require less than two parking spaces per unit and call for no additional parking for guests, contractors, and the like.*
4. *The impact of a 49’ height limit on residences along Prospect Street is of concern. The homes on that street are largely one- and two-family dwellings that are 25’ – 30’ in height. The rezoning would therefore authorize construction of a building nearly twice as tall as some of the abutting structures on Prospect Street and more than twice as tall as some of the commercial structures along Main Street. The size and mass of the proposed building would be considerably greater than those of any of the structures on abutting lots. Is this appropriate? And as previously mentioned, if the properties along Main Street that are proposed for inclusion in the overlay were redeveloped with 49’ tall buildings, would that be acceptable/desirable?*

Cassidy concluded her draft stating this is her robust recommendation.

Bolgen stated the only comment she had is that the second line of the last page in her draft letter should read “constructing” not construction.

Ventresca complimented Cassidy on her draft recommendation as it contained many items that were discussed and added that this is a “tough” piece of property and this is an opportunity for something to happen there. He feels the wording of this ordinance needs additional work and is poorly constructed and it is unfortunate that the Board was not granted the opportunity to engage in dialog with the City Council to hash these issues out.

Turner stated a main concern is density while adding it would be beneficial to have something more esthetically pleasing in that neighborhood than what is there presently. She questioned whether or not it would be possible to place a provision in the ordinance that would cap the total number of units that could be permitted in this Overlay District, with the idea that once that number was reached, no more permits for residential dwellings would be issued.

Responding to Turner’s idea, Cassidy suggested the Council could seek the opinion of the City Solicitor while Bolgen agreed it is an interesting idea and that perhaps the opinion of the Solicitor should be sought as to whether or not real estate/zoning/property law in the Commonwealth allows for that.

Cassidy stated she could add a paragraph in the recommendation letter suggesting the City Council vet that issue with the City Solicitor.

Edmonds reminded the Board that whatever decision the Board and/or City Council makes, it will be a fifty-year decision and stated it is important to keep the long-term interest of the City in mind.

Motion to accept the Planning Board Director’s recommendation as written with the addition of the suggestion to consider limiting the number of total units in the Railway Overlay District and the planning Board suggests that any such decision be vetted by the City Solicitor before it is enacted, made by Bolgen; Seconded by Callahan for discussion. Callahan asked Bolgen to clarify her motion, asking if it is a favorable or unfavorable motion.

Bolgen clarified this recommendation references MGL Chapter 40A Section 5 which she re-read today. That statute requires the Board to “provide a report with recommendations.” Therefore, Bolgen continued, if that is all the Board is required to do, members have certainly provided fulsome recommendations to the City Council on issues large and small. Bolgen added that there is no mandate in Chapter 40A requiring the Board to brand its recommendation as favorable or unfavorable and suggested that the Board does not in this case. She stood by the original motion to accept the Planning Board Director’s recommendation, with Turner’s amendment.

There was no further discussion so Edmonds called for the vote.

The motion carried, 6-0.

DOWNS COURT SUBDIVISION

Cassidy stated the construction completion date for this two-lot subdivision expired on September 30, 2019. The developer, Mr. Cialdea, indicates that all construction has been completed as planned but he has been unable to obtain final As-built plans for staff review and Board acceptance. The developer proposes a one (1)-month extension of the subdivision completion date for this reason.

Cassidy recommended the Board vote to extend the definitive subdivision completion date, from the current date of September 30, 2019 to October 30, 2019.

Motion to accept the Director's recommendation made by Doherty;
Seconded by Ventresca;

Edmonds asked if there was any discussion and Bolgen stated she supports the extension based on the fact that the subdivision construction work is complete and all that remains is a paperwork compliance issue. The extension is appropriate for that specific reason.

Ventresca stated he is familiar with the area and he agrees with the assessment that the subdivision appears complete.

The motion carried, 6-0.

DRAGON COURT (GARVEY ROAD) SUBDIVISION

Turner recused herself from this matter.

Phyllis Etsell, representing the developer Robert Murray, stated at the previous meeting they intended to submit the As-Built and acceptance plans as well as the conveyance of easements for the utilities and street before the next meeting. Etsell stated the documents and plans were in fact submitted and have received a favorable review by the City's Engineering Department. Etsell asked the Board to return the bond and accept the subdivision and stated there is one small issue with regards to the five-foot reserve area and asked if the Director had any comments.

Cassidy stated the city's Engineering Department, after a comprehensive site review, found the As-Built and Acceptance plans acceptable the quality of the construction work very good. The developer's design engineer has submitted a written statement saying the construction of the subdivision was done in substantial conformance with the approved subdivision plans.

Cassidy stated she received a couple of emails recently from property owners and/or neighbors and abutters expressing concerns about some work that has been done and some remaining work regarding drainage and grading on the lots. The drainage easements and conveyances were done a little differently than initially envisioned. There are ten condo associations (each lot being a two-unit condo association) and all ten of the condo associations are subject to the Homeowner's Association documents. However, with the five-foot planting strip, there was a clear reference to a five-foot reserve strip in the deed to all of the units, but the Planning Board's subdivision approval letter required that a restrictive covenant be created and cited in the deeds. A restrictive covenant was created and submitted to and approved by the Board in 2017 for inclusion in the deeds to the individual lots. Cassidy continued that although the two-page restrictive covenant was recorded at the Registry of Deeds, there was not a specific citation of that recorded covenant in the deeds to the individual units. There is a reference to a reserve strip, but not to the specific covenant language that was on record. The City Solicitor is recommending when the Board votes to release the remaining bond money, that it do so subject to Mr. Murray sending to each of the twenty unit owners in the subdivision a copy of the restrictive covenant that is on record at the Registry of Deeds and a copy of the HOA document to make sure that all property owners are aware of their obligations with respect to the drainage easement not only with regard to maintenance responsibility for the drainage easements but also about the existence and the limitations that come with the five foot reserve strip (tree belt). Cassidy's recommendation is to release the remaining bond monies in this subdivision subject to receipt of proof that Mr. Murray has sent the above-mentioned documents to the owners by certified mail. The purpose of this mailing would be to ensure the

new homeowners have a complete understanding and awareness of the purposes, homeowner obligations and restrictions embodied in the easement documents.

Edmonds asked for clarification as to whether or not the City's Engineering Department confirmed the drainage system works as designed.

Cassidy noted the City's Engineering Department has stated the subdivision was constructed in accordance with the approved plan, including the lot grading. It is not uncommon that there may be some elevation deviations of less than one foot that need to be regraded. It does not mean the subdivision is not in substantial conformance with the plan.

Edmonds asked for clarification as to when the "massaging" of the grading happens.

Cassidy stated one Garvey Road homeowner told her that they have been contacting Mr. Murray periodically when they have an issue and the resident stated that Mr. Murray has been very responsive and his contractor has been addressing the issues as they arise. Cassidy added that the Board has received photographs from a homeowner that illustrates some of this type of work.

Edmonds asked if this work has been done since the winter and if it is continuing to be tweaked.

Cassidy confirmed that Mr. Murray has been back to the property since the time of sale of units to address various owners' concerns.

Callahan continued the discussion stating he is concerned if the Board releases the bond and grading (regarding drainage issues) still needs to be addressed.

Cassidy replied to Callahan's comment stating that it would not be the responsibility of the City or the Planning Board. Cassidy posed the question to Etsell as to whether or not the property owners have a warranty on the property that would obligate Mr. Murray to continue making improvements to the lots.

Etsell stated the property owners all have warranties for the buildings themselves. As far as the drainage, the concerns of the property owners have been addressed. Etsell noted there have been some very heavy rainstorms while they were working at completing the subdivision and grading the lots. As the developer would hydroseed, often a huge rainstorm would wash the hydroseed away. Mr. Murray did quite a few repairs and in some instances, they did some regrading of the lots to improve the drainage. Etsell stated she believes everything has been fixed with satisfactory results and the subdivision has been completed per the approved plans and the same is noted in the Engineering Department's memorandum. Etsell added that if there are any issues in the future, she believes the Homeowner's Association would be the entity responsible for making improvements. She asked for further clarification from Callahan as to the specifics of his concerns.

Callahan stated his concern is that it appears that some of the residents of the Association have concerns with the grading and drainage on their property. Callahan would not feel comfortable signing off on a development in this situation, while adding that he would like to see the developer iron out those issues. He further stated that he feels the developer has met the goal of substantial completion of the subdivision but would like to make sure the residents are satisfied with their property. Callahan would like to find that if the Homeowners Association has a specific concern, such as drainage, it has been satisfactorily addressed by Mr. Murray. Callahan added that it seems as though every other week the Board is receiving a letter stating the opposite of what the developer is saying regarding drainage and that is why at the last meeting it was requested that the City's Engineering Department take photos to confirm it has been done correctly, which it appears it has been; but the residents are still emailing regarding drainage issues as of October 1st.

Etsell stated she has not seen the recent emails that Callahan is referring to regarding the residents' most recent complaints and inquired of their concern.

Cassidy apologized to Etsell for the oversight and the fact that she did not receive the emails. Cassidy read the email into record from the resident at 9 Garvey Road and pointed out that he is a homeowner that has an easement in his back yard. The email discussed landscaping engineering design; easement concerns; water logging issues; water runoff issues; and the fact that they would like the developer to Implement a permanent solution.

After some discussion regarding weather cycles and postponing a decision on the bond release until the Spring, Callahan stated we are due for heavy rains over the next couple of days and he would like the City's Engineering Department to make a site visit during that time to observe the drainage.

Motion to continue discussion on this matter to October 22, 2019 and to send correspondence to the Engineering Department requesting they conduct a site visit this week during the upcoming rainstorms to analyze puddling and drainage on the site made by Callahan;

Seconded by Ventresca for discussion;

Ventresca motioned to add to the motion a requirement that the developer send notification to all homeowners relative to easement documents (specifically, a copy of the restrictive covenant that is on record at the Registry relative to the 5' reserve strip/tree belt and a copy of the HOA document);

Motion carried, 5-0-1 (Doherty, Bolgen, Callahan, Ventresca, and Edmonds in favor, no one in opposition, Turner recusing).

Turner rejoined the meeting.

APPROVAL OF MINUTES

Motion by Bolgen to approve the September 16, 2019 Planning Board minutes;
Seconded by Doherty;
Motion carried, 6-0.

Motion by Bolgen to approve the September 24, 2019 Site Visit Meeting Minutes;
Seconded by Doherty;
Motion carried, 6-0.

Approval of the October 8, 2019 minutes will be deferred to the next meeting.

PLANNING DIRECTOR UPDATE

Cassidy stated the next meeting agenda will include a continuation of the Public Hearing for 0 Village Street (Lot 3) and discussion on revising the Subdivision Rules and Regulations.

Edmonds asked if there was any other business for the Board to conduct. There was none.

Motion to adjourn the meeting made by Bolgen at 8:05 p.m.;
Seconded by Doherty;
Motion carried 6-0.

Table of Documents Used and/or Referenced at Meeting

Planning Board Staff Report
Staff Report Attachment (Railway Overlay District [ROD]): Transcript of City Council Discussion of ROD (October 2, 2019 meeting); City Clerk's correspondence to Planning Board from City Council;
Staff Report Attachment (Downs Court Definitive Subdivision): Developer's extension request letter
Staff Report Attachments (Dragon Court Definitive Subdivision): (1) Engineering response memo/comments relative to post-construction field inspection; (2) Resident emails and staff responses relative to concerns about landscaping, fence installation and drainage conditions; (3) Engineering statement indicating that construction is completed in substantial conformance with approved subdivision plan
Draft Planning Board Meeting Minutes: September 16, 2019 and Site Visit on September 24, 2019

Respectfully submitted,

Karen Smith

Karen Smith