

CITY OF NEWBURYPORT OFFICE OF PLANNING AND DEVELOPMENT

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TO: Andrew R. Port, Director of Planning & Development

FROM: Kate Newhall-Smith, Affordable Housing Trust Administrator

DATE: April 3, 2015

RE: Newburyport's Proposed 40R District and its Consistency with the Draft Master Plan

Created in 2001, the Newburyport Master Plan (the "Plan") was long due for a review and update. Begun in early 2014, the City, through its Planning and Development Office, has been coordinating the public process and the drafting of a new Plan, which is expected to be adopted in summer 2015. Throughout the various public and subcommittee meetings the community has provided ideas, comments, strategies and solutions to help determine how Newburyport will grow and thrive over the course of the next ten years.

While comprised of a variety of featured topics ranging from transportation to cultural resources to open space, the chapter focusing on land use and development represents the fundamental element of the Plan. Policy decisions about the community's land use, including zoning code revisions, will directly impact all other elements of the Plan.

Newburyport's Draft Land Use & Development Chapter

Although still in draft form, the Land Use & Development chapter specifically speaks to the need to adopt a 40R smart growth district that will serve a variety of stated objectives:

- Preserve Land As development pressures continue in this significantly built out community,
 there is a concerted effort to preserve remaining existing open spaces through guiding future
 development to appropriate locations to minimize negative impacts on the natural
 environment. The 40R district, with the proposed density allowances of up to 40 units per acre,
 provides an incentive to locate growth in this area where much of the land is already developed
 thereby minimizing the desire to develop more pristine open spaces.
- "Smart Growth" and Sustainable Development Designated as a Green Community in 2010,
 Newburyport continues to make strides in its efforts to incorporate smart growth principles,
 low-impact development techniques and sustainable development practices into every facet of
 its permitting processes and municipal activities. The City is pursuing the 40R district so that it
 can more easily concentrate new, mixed-use development of properties in close proximity to

the MBTA commuter rail station. Once developed, the parcels within the proposed district will feature a mix of residential and non-residential uses, pedestrian-oriented design and connectivity, transportation choice and high quality urban design.

- Affordable Housing The Master Plan incorporates a chapter dedicated solely to housing; however, residential development also plays a prominent role in the Land Use & Development chapter. The 40R district, once adopted, will require a minimum of 25% of all residential units created be affordable to individuals and families earning 80% of the Area Median Income. The units that are constructed in the district will help Newburyport achieve the state-mandated goal of providing at least 10% of its housing stock as affordable.
- Improve a Gateway to the City This area of the City is a gateway to Newburyport as the terminus of the commuter rail line and also as drivers come north along Route 1 from Newbury. For more than a decade redevelopment of this gateway to the City has been discussed with the general goal to create a sense of place, a new business and residential area based around the availability of public transportation and is complementary to the downtown. The adoption of the 40R district will facilitate this type of development. The mix of uses, including residential, retail and office, supported by shared parking facilities with interconnecting walkways among the developments to the commuter rail station and the Clipper City Rail Trail, will transform the area from a sea of parking lots and impervious surfaces to a vibrant, active village-style neighborhood.

Land Use & Development Goal #8

Goal #8 of the draft Land Use & Development chapter specifically addresses the City's desire to create a 40R district. It reads as follows:

Goal LU-8: Encourage appropriate redevelopment of the Route 1/Traffic circle area into a mixeduse neighborhood centered on the MBTA train station and encompassing the characteristics of Transit Oriented Development ("TOD").

The train depot, located within this area provides a unique opportunity for the City to establish a 40R "Smart Growth" district that will enable owners of parcels within the district to redevelop their properties to promote residential and commercial growth. This area has the potential to be a new, pedestrian- and transit-oriented neighborhood with a design and culture that is uniquely its own while complimentary to that of the rest of the City. The Objectives and Actions listed for this neighborhood focus on this future to ensure appropriate density and design.

CITY OF NEWBURYPORT

Strategic Land Use Committee



Strategic Land Use Plan

A Strategy for Conservation and Development June 2004



Introduction

HIS DOCUMENT PRESENTS A NEW VISION AND STRATEGY for an important area within the City of Newburyport. This area, stretching from Interstate 95 to Route 1, includes the City's industrial park, farms, and an open space corridor along the Little River, as well as several residential neighborhoods. With excellent highway and commuter rail access, and with much of its undeveloped land zoned primarily for industrial use, the area has long been valued for its economic opportunities. In recent years, though, its ecological and aesthetic qualities have also become recognized. Competing interests and values have converged in this area, causing residents to revisit long-standing land use policies through a focused and public planning process. This process has resulted in recommendations for policy changes designed to protect significant environmental resources while supporting the City's continued economic vitality.

Overview

DURING 2003-2004 THE CITY OF NEWBURYPORT engaged in a strategic planning

process for a 1500-acre area in the southern portion of the City. The planning effort was a priority recommendation of the City's 2001 Master Plan.

The study area encompasses the City's industrial park, several residential neighborhoods, and an open space corridor of woods and farm fields extending into the Town of Newbury. It represents the edge between the densely developed sections of Newburyport to the north and the more sparsely settled areas to

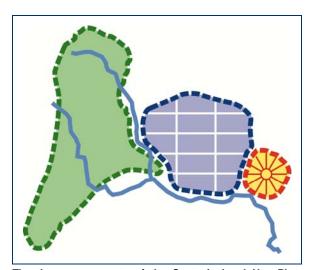


The Strategic Land Use Plan study area includes the existing industrial park, large expanses of open space, and smaller commercial districts and residential neighborhoods.

the south, and is thus an area where competing interests of growth and conservation converge. The planning study was undertaken to identify ways to reconcile these interests and to guide future land use policy in this area of the City.

The plan described in this document sets forth a strategy for redirecting future development within the study area to achieve several complementary goals. The three major elements of this strategy correspond to three distinct areas within the overall study area:

- Common Pasture Greenway: Preservation of a substantial undeveloped corridor in the upper portion of the Little River watershed.
- Industrial Park: Continued development and redevelopment of industrial uses within the City's existing Industrial Park.
- Transit-Oriented Development: Creation of a higher-density node of mixed-use development surrounding the MBTA Commuter Rail station and the Route 1 traffic circle.



The three components of the Strategic Land Use Plan: Greenway, Industrial Park, and Transit-Oriented Center.

In addition to expanding the City's tax base in a manner that is sensitive to local values and environmental sustainability, the economic development portions of the plan (the industrial park and the transit-oriented development) will provide a wide range of additional **employment opportunities** for low, middle, and moderate income persons. At the same time, the mixed-use transit-oriented development will provide **housing opportunities for all income levels**: it is anticipated that 20 percent of the new housing units will qualify as affordable housing under Chapter 40B, helping the City to meet its regional affordable housing responsibilities.

Along with the three major elements outlined above, the plan also incorporates several additional features:

- Clustering of future residential development so as to preserve vistas and opportunities for recreational use, particularly near the intersection of Low Street and Crow Lane, and along Hale Street.
- Defining Low Street as a transition zone between industrial and residential districts, and strengthening Low Street's visual quality and image as a major entry corridor into the City.

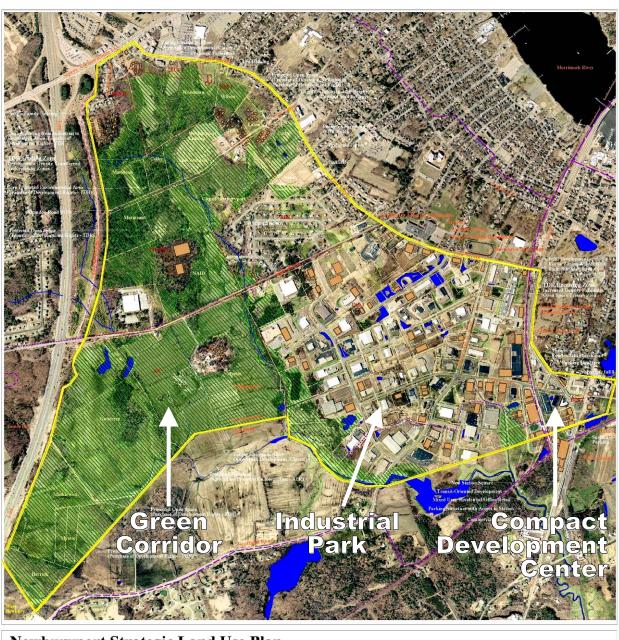
- 6. Encourage **infill development** within the existing industrial park to use this developed area more efficiently, taking advantage of existing infrastructure (streets, water, sewer, etc.).
- 7. Promote redevelopment around the MBTA Commuter Rail station to achieve higher density, mixed-use, transit-oriented, pedestrian-friendly environment. Attain higher density through the use of multi-story buildings with structured parking.
- 8. Promote redevelopment around the Route 1 traffic circle to promote a more **walkable community center** with an increased amount of economic activity and a greater mix of uses.
- 9. Use the redevelopment of the transit area and traffic circle to create a **sense of place** at this gateway to the City. Promote the development of the area as a complement to downtown, not a competing center.
- 10. Promote better **pedestrian links** from the transit/circle area to the industrial park and to downtown Newburyport. Build on the existing plans for bicycle and multiuse trails, including the Little River Nature Trail and the Clipper City Rail Trail.

Description

The plan that has resulted from this process recognizes three major components of the study area: a **green corridor** along the westerly side, the existing **industrial park** area in the center, and a **compact development node** around the commuter rail station and traffic circle at the east end of the study area. The full plan is depicted in Figure 12, and the components are described in the following pages.

Under this plan, the preservation of open space in the proposed green corridor and the increase in development intensity around the rail station and traffic circle are explicitly linked together. In other words, the total amount of development in the entire study area under the Alternative Future Land Use scenario should be comparable to the amount of development under the Likely Future Land Use scenario. The principal mechanism for making this connection is a "Transfer of Development Rights" (TDR) program, under which each increase in the allowable development on one parcel is balanced by a specific reduction in development potential on another parcel.

Figure 12: Alternative Future Land Use





The "Alternative Future Land Use" scenario is an illustration of how land development <u>might</u> occur with certain changes in land use policies. It is <u>not a prediction</u> that specific parcels will be developed in specific ways or at specific points in time; and it <u>does not represent an official development proposal</u> for any parcel.

Figure 18 depicts the Alternative Future Land Use scenario for the Business Circle District and Commuter Rail station area. Increased development in this part of the study area provides the complement to intensive preservation in the Common Pasture Greenway, and also creates the opportunity for the City to achieve a variety of goals, including expansion of the commercial tax base and upgrading of a neglected commercial district; provision of affordable housing in an area with transportation access and supporting services; and creation of pedestrian and bicycle links from the rail station toward the downtown area.



Figure 18: Alternative Future Land Use - Business Circle District / Commuter Rail

Figure 18 presents a vision for this area that is dramatically different from its current scale and appearance, but based on historic development patterns within the City. As in downtown Newburyport, this new district is characterized by three- to four-story buildings placed close to the street edge, with a mix of retail, office, and residential uses. Parking is provided in some shared lots behind the buildings, but most of the surface parking at the rail station and adjacent to the courthouse has been replaced by parking garages. The entire area has a density that supports both transit use and pedestrian circulation.

It is important once again to emphasize the conceptual nature of the scenario and this illustration: this does not represent a specific plan for any parcel, and much further work is needed to define the densities and development standards that should apply in this location. Furthermore, not all the floor area shown in this illustration will be built, because detailed analysis of environmental constraints and other factors will undoubtedly preclude

In its simplest form, Transfer of Development Rights is established as a local zoning regulation, within the zoning ordinance. However, in this case the receiving area also includes land within the Town of Newbury; therefore, the City and Town should investigate the possibility of creating a two-town TDR program.

More background and explanation of Transfer of Development Rights are provided in the Appendix (see pages 97 ff.).

Planned Development Districts

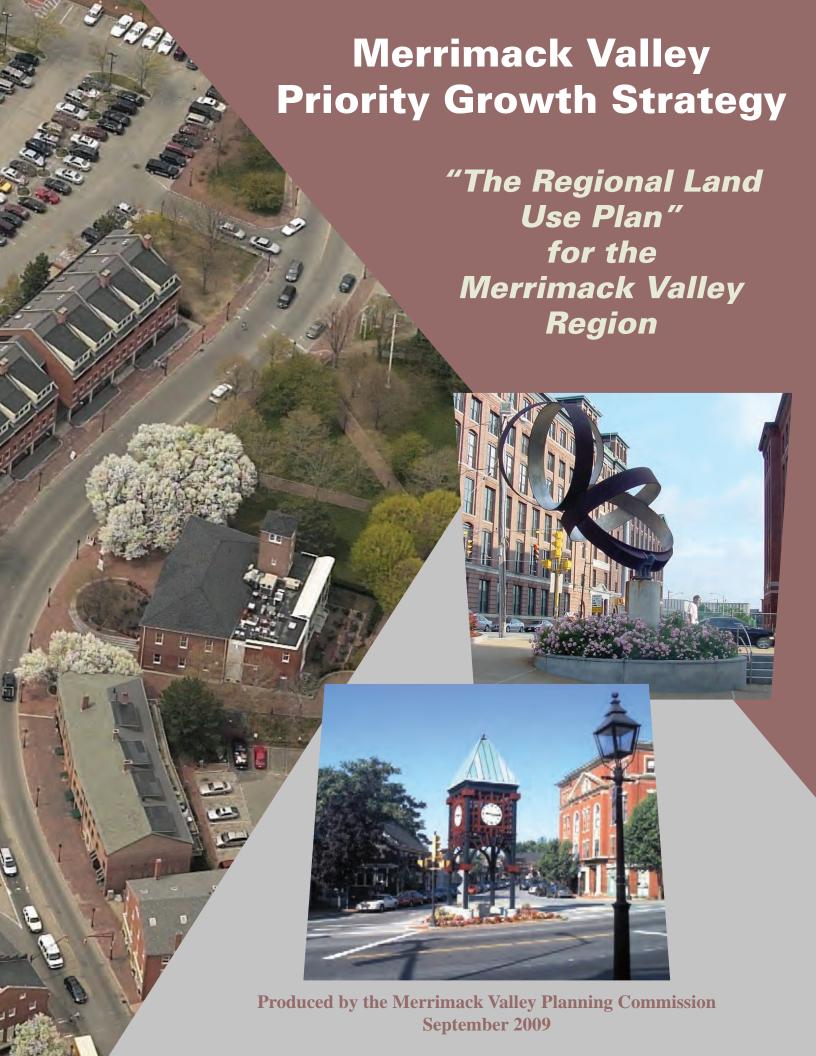
The most complex regulatory strategy recommended to implement the Alternative Future Land Use scenario is to **create two new "Planned Development" overlay districts** around the MBTA Commuter Rail station and the Route 1 traffic circle, in order to encourage compact, mixed-use development. In these districts the uses currently allowed in the underlying zoning districts (Business 1 and Industrial 1) would continue to be permitted, but property owners would also have the option to develop under a different set of regulations in accordance with a specific plan established by the City and subject to clear site and building design standards.

TRANSIT-ORIENTED DEVELOPMENT

The Planned Development District 1 (PDD 1) would promote the Transit-Oriented Development around the MBTA Commuter Rail station on Boston Way. The district would be bounded on the north by Parker Street, on the south by the Little River, and on the west by the drainage tributary between Boston Way and Bixby International. The easterly boundary would be determined after further study.



Orenco Station, in Hillsboro, Oregon, is a mixed-use, transitoriented development on Portland's Westside light rail line. (photo: Fregonese Calthorpe & Associates)



The Merrimack Valley Planning Commission ("MVPC") was created in 1959 with the general purpose to "foster a cooperative effort among its communities in resolving common, regional problems, to allow its communities to plan jointly, and to promote with greatest efficiency and economy the coordinated and orderly development of the region and the general welfare of its residents."

How do you get fifteen different communities, all separate a-political bodies, tied together through history, economics, transportation and natural resources to cooperate to resolve regional problems? How can communities plan jointly to promote the coordinated and orderly development of the Merrimack Valley region? The answers lie in the development of a regional strategy. A strategy based on "Smart Growth" principles, which identifies the roles each community plays and promotes a shared vision.

The vision they share is a region that promotes development in the right place that generates good jobs, new tax revenues, creates affordable housing, stimulates the economy and creates a sense of place. A region that balances growth with preservation, maintains open space and the character of the region, and is served by an effective transportation system. This Strategy is a tool for achieving this vision.

The strategy focuses on identifying Concentrated Development Centers where communities want to encourage growth. It also suggests areas that should not be developed to preserve the character of the region and protect environmental resources. And it evaluates the suitability of the regional transportation network to serve these land use patterns and recommends smart mobility improvements that will best serve present/future development.

To ensure that the Strategy accurately reflected the communities' priorities, elements in the Strategy were generated and formed with active local involvement. Not only were community representatives interviewed and used as a "sounding board" but all local Master Plans, Executive Order 418 Plans, Community Development Plans and Open Space & Recreation Master Plans were reviewed for guidance. To augment the traditional public process a number of unique outreach efforts were undertaken. Forum presentations on the draft Strategy were made at the 2008 annual Regional Planning Day, Merrimack Valley Metropolitan Planning Organization, Merrimack Valley quarterly planning directors meeting, Comprehensive Economic Development Strategy (CEDS) committee and the Merrimack Valley Regional Legislative Caucus. Presentations were also made to community leaders, Boards of Selectmen and Planning Boards, throughout the region.

In September 2009 the commissioners of the Merrimack Valley Planning Commission unanimously approved the Merrimack Valley Priority Growth Strategy as the official regional policy plan for the region.

As clearly outlined in Section 4.0, if the region's communities do not grow it is likely that they will not be able to meet the demands placed on them by their citizens: new jobs will not be created, housing will not be affordable, transportation options will be limited and local governments will not have the resources to provide municipal services. This does not mean that communities should allow uncontrollable growth or that there should not be a balance with protecting the character of the communities and of the region. There needs to be a responsible way of promoting the orderly development of the region taking into consideration the needs to protect its natural resources. The approach recommended is to develop a regional priority growth strategy founded on the principles of "smart growth".

The purpose of this section is to identify locations in the region where growth is appropriate based on zoning, infrastructure, access and limited environmental impacts. These areas have been identified as Concentrated Development Centers (CDC) and are defined as "areas of concentrated development, including a city or town center, consisting of existing and appropriately zoned commercial, industrial and mixed-use areas suitable for high-density development".

To ensure that there is local 'buy in' to this strategy and that it is a locally driven process each community was asked to identify growth areas that were consistent with the CDC definition. Once identified, data for each CDC was collected. The data collection was extensive and included the following:

- Land Use: Uses allowed by zoning were identified (Industrial, commercial and residential). The density allowed by each community in the CDC was reviewed and calculated. And any CDC targeted by the local, state or federal governments for development incentives was recognized such as Priority Development or 40R sites.
- **Infrastructure:** The availability of infrastructure to support development was identified, including; water, sewer, broadband & utilities.
- Access: Transportation access including road, transit and off road connections were recorded. Using the MVPC Congestion Management Study each CDC was evaluated for any congestion that may limit access or development potential.
- **Environmental:** All environmental constraints that could impact development of the CDC were identified, including, wetlands, flood plains, water supply protection areas and rare species habitats.

As can be imagined each CDC has unique zoning requirements, access points, available infrastructure and environmental constraints and as such needed to be evaluated as to the nature and suitability for development. MVPC collected and evaluated the CDC data shown in Appendix 10.6 according to three rankings: highly advantageous, medium and low. Criteria used to make these rankings were based on the following ranges:

- Land use: Highly Advantageous A CDC that allows a mix of uses, has density of at least a Floor to Area Ratio (FAR) of 1.0, and is designated a PDS to low where single uses are allowed, a FAR of less than .5 and no PDS designation.
- **Infrastructure:** Highly Advantageous A CDC that is served by water, sewer, broadband and all utilities to low where the CDC has limited access to water and sewer.
- Access: Highly Advantageous A CDC that has highway access, transit service and is friendly to bikes/pedestrians to low where the CDC has limited highway access, no transit service and is not pedestrian friendly.
- Environmental: Highly Advantageous A CDC that has minimal impact on wetlands, water protection areas, rare species habitats and not located in a flood plain to low where the CDC has a significant impact on these environmental sensitive elements.

Each CDC was assessed for its consistency with the "Smart Growth" principles embedded in this Strategy, particularly Section 8.0. Each CDC was then classified according to appropriate physical scale and mix of uses as follows:

- Smart Growth Center: Areas that allow high density concentrated development and a mix of uses, has suitable infrastructure to support development, has good access both auto and pedestrian, is served by transit and has limited environmental constraints (example would be an urban downtown).
- Center of Commerce: Areas that allow a mix of high density concentrated development, excluding residential, served by water and sewer, may be served by transit or a transportation management association and has limited environmental constraints (example would be a suburban office or business park).
- **Business Center:** Areas of high density industrial or retail with limited infrastructure, mainly auto oriented, little pedestrian mobility or transit and limited environmental constraints (example would be an industrial park or retail center).
- Village Center: Areas of concentrated development of appropriate density in context, commonly known as a town center or a community's downtown. Encourages a mix of uses, has access to infrastructure, served by transit, pedestrian friendly and has limited environmental constraints.

The following is a description of all CDC's by community and their "Smart Growth" classification and recommendations for strengthening each CDC:

NEWBURYPORT

Downtown Center

Land Use: Downtown Newburyport is comprised of approximately 150 acres of densely developed mixed uses. It includes retail, service, and office uses. The scale is intended to reinforce downtown's role as the focus of activity in Newburyport. Multi-use development combining residential and business use is encouraged. Activity is oriented to pedestrian traffic and centralized parking is in

CDC Classification:

• Smart Growth Center

Recommended Strategy:

- Increase Parking
- Complete Trail System

place. Businesses that consume large amounts of land and interrupt pedestrian circulation and shopping patterns, and single and two-family dwellings are prohibited. Newburyport's historic downtown has been a bustling center of activity and vitality for the last three decades. Unlike many communities located on the water, Newburyport, to its credit, has developed a much better connection to the water than most, although there are still areas where improvement can be made towards a more functional, attractive and accessible waterfront. Newburyport continues to work to improve riverfront access and functionality.

Infrastructure: Downtown Newburyport is served with water, gas, sewer, and broadband.

Access: The downtown may be accessed via Route 1, which connects north to Salisbury and south all the way to Boston along the coast. Alternatively, Route 113, High Street, connects to I-95 at Exit 57. By traveling north on I-95 one exit across the Merrimack River, a connection can be made with I-495 via Route 110. Newburyport is serviced by the MVRTA's fixed bus Route 51, which also connects with the Ring & Ride service out to Plum Island. In addition, commuter bus service into Boston stops both downtown and at the Park & Ride on Storey Avenue (Rt. 113) adjacent to I-95. Newburyport also has a MBTA commuter rail station off of Parker Street and Route 1.

Newburyport is the first community in the Merrimack Valley region to create bicycle lanes, which are on High Street. Beginning at the waterfront, the new Clipper City Rail Trail (to open in 2013) will be a multi-use trail that connects the downtown to the train station.

Environmental: Approximately 3% of the downtown is considered wetlands, and 11% is within the 100- year floodplain.

Recommended Strategies: Newburyport has a very vibrant downtown redeveloped in the 1970's using smart growth principles well before that term became popular. As economic conditions fluctuate, the City needs to work to keep the downtown attractive and keep vacant storefronts to a minimum. The City needs to continue implementation of its waterfront plan to make the immediate riverfront more functional and accessible. Plans to redevelop and expand the waterfront should be encouraged and supported.

Road infrastructure is adequate for accessing downtown, though it does experience seasonal traffic congestion and truck deliveries on State Street can cause expected traffic congestion. However, parking is inadequate during the summer months and efforts should be made to consider a parking structure to address this issue. A transit study should also be undertaken that will look at the option of creating a seasonal circular bus between Amesbury, Salisbury and Newburyport, including the

commuter rail station so that available parking capacity is accessible for summertime use. Other transit needs include synchronized connections between the downtown and the commuter rail.

Planning should continue for the second phase of rail-trail construction, the City Branch Trail that will create a loop with the Clipper City Rail Trail. The final piece for the rail-trail should also be considered, which will create a crossing over the Merrimack River to link with the Old Eastern Marsh Trail in Salisbury.

Newburyport Industrial Park

Land Use: The Newburyport Industrial Park CDC comprises approximately 443 acres of which approximately 80 acres is developed with over 3.4m square feet of building site. This area is zoned Industrial-1, which allows a broad range of manufacturing and industrial uses as of right, along with accessory retail uses. Most non-industrial uses are prohibited, as are all residential and marine uses. Parcels in this zoning district must be at least 50,000 square feet in area, maximum lot coverage ranges from 30 to 40 percent, depending on use, and buildings cannot exceed 40 feet in height.

CDC Classification:

• Business Center

Recommended Strategy:

- Revise Zoning Around Train Station
- Traffic Improvements to Route 1 Rotary
- Improve Pedestrian Access

According to Newburyport's Strategic Land Use Plan, this area is likely to see incremental, infill development on the remaining buildable lots, and possible expansion of existing developed lots where feasible given zoning, environmental considerations, and existing covenants on the land.

Infrastructure: All parcels in this CDC have access to public water, sewer, gas, and broadband.

Access: The primary access roads that flank the Industrial Park are Low Street and Route 1. Parker Street runs through the site and provides access to Route 1. Low Street provides access to Route 113 close to the Exit 57 interchange of I-95. Scotland Road and Park Street also provide access to I-95 in Newbury at Exit 56. During the period 2004-2007, 41 accidents occurred at the intersection of Low St. and Route 113. Sixteen accidents occurred at Route 1, Pond and Low Streets. In addition, 51 accidents occurred during this same period at the Exit 57 interchange on I-95.

The MVRTA's fixed bus Route 51 does provide access to this area along Low Street, Henry Graf Junior Road and Parker Street. The MBTA train station is situated in the southern section of this site below Parker Street. The Clipper City Rail Trail will be accessible from a portion of the Industrial site and provide easy access to the train station and downtown.

Environmental: Future development in this CDC can occur, but will be somewhat limited due to 29% of the land being in water supply, 7% being wetlands, and 3% being in the 100-year floodplain.

Recommended Strategies: The City's Strategic Land Use Plan suggests that future development in the industrial park follow different site planning guidelines than what has been built in the past. Most street frontages have been dominated by parking lots, future building should be closer to the street line with parking in back. The Plan also recommends that higher density development be achieved through redevelopment of existing parcels, rather than on vacant parcels of land.

In addition, any new development that occurs around the MBTA Commuter Rail Station and the Route 1 traffic circle should not conform to propagate the low density development pattern that current exists, particularly the one story, single use buildings. New development should be multistory, mixed-use buildings with much greater total floor area. Recommended uses in this area include retail, office, and residential with integrated parking and shared lots. Following density and design now in the downtown, this area could be a dramatic new gateway to Newburyport.

The CDC stands to benefit from the recent redesign of the Low Street and Storey Avenue intersection that has reduced congestion and reduced collisions. Improvements to the Route 1

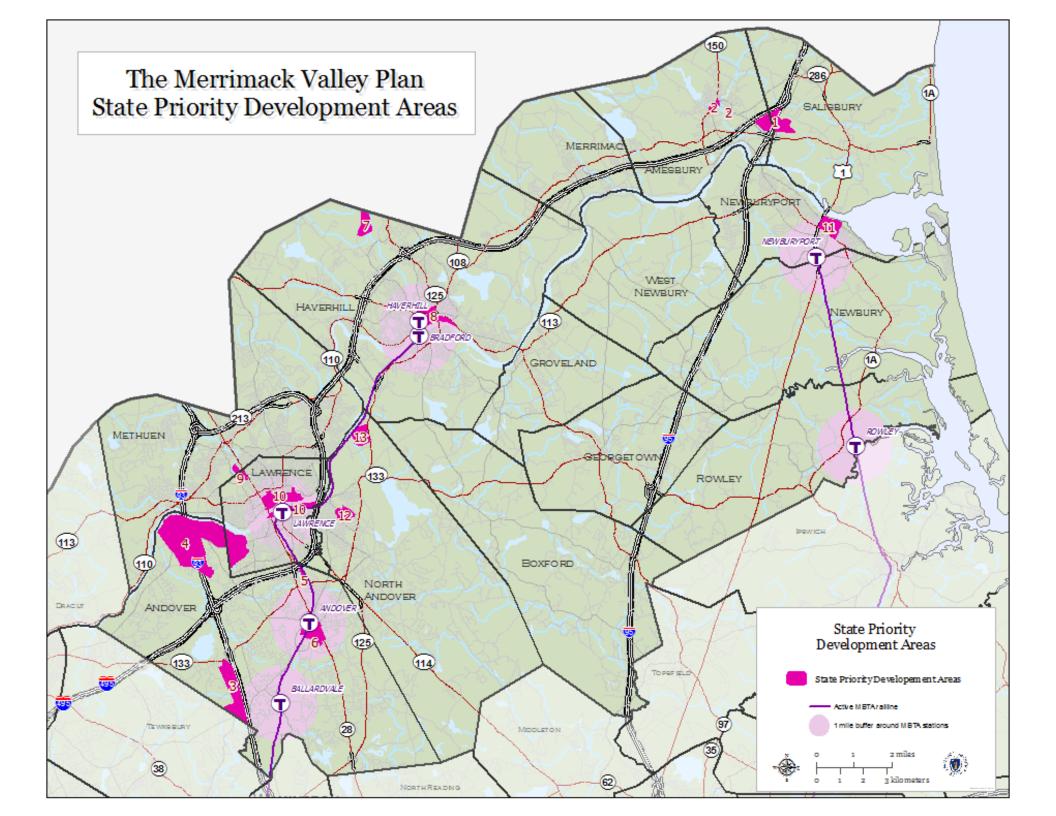
Rotary/Low Street intersection would be beneficial. Pedestrian safety would be significantly enhanced with the inclusion of sidewalks on area roads.

In 2005 Newburyport and Newbury conducted a feasibility study to create the Little River Transit Village served by the MBTA train station. Using Transfer of Development Rights (TDR) techniques and extending water and sewer service from Newburyport in Newbury, both communities could realize a significant Smart Growth Development area. Reconsideration of this concept should be considered.



Newburyport Industrial Park

MERRIMACK VALLEY STATE PRIORITY DEVELOPMENT AREAS							
Site ID	Priority Development Area	Matrix Name	Municipality	State Recognized	TOD (1 mi.)	Hsg Opp	Туре
1	Interstate 495 & Interstate 95	Golden Triangle Business Park	Amesbury Salisbury	43D			Ground up site
2	Lower Millyard & Village Center	Lower Mill Yard Village Center	Amesbury		X	X	Urban Center/TOD
3	I-93/Osgood Street	193 Osgood Street	Andover	43D			Reuse
4	River Road & Lawrence Industrial Park	River Road Industrial Park	Andover Lawrence	43D GC			Reuse
5	Brickstone Square	Brickstone Sq.	Andover	43D			Urban Center
6	Downtown Andover	Downtown	Andover		X	X	Urban Center/TOD
7	Upper Hilldale Industrial Park	Hilldale	Haverhill	GC, 43D			Reuse
8	Downtown - Water Street	Downtown	Haverhill	GC, GDI, 40R	X	X	Urban Center/TOD
9	Malden Mills - Lawrence	Malden Mills	Lawrence Methuen	GC, 40R GC		X	Urban Center
10	Merrimack Street Gateway	Gateway Merrimack	Lawrence	GC, GDI GC, GDI, 43D, 43E	X		Urban Center/TOD
11	Downtown Center	Downtown Center	Newburyport		X	X	Urban Center/TOD
12	Machine Shop Village	Machine Shop	North Andover			X	Adaptive Reuse
13	Osgood Landing	Osgood Landing	North Andover	40R, 43D		X	Reuse



APPENDIX A CONTINUED

