



Historic Preservation Commission Agenda

Town of Swansboro

Tuesday, July 18, 2023

I. Call to Order

II. Approval of Minutes

a. May 16, 2023 Regular Meeting Minutes

III. Business

a. Certificate of Appropriateness/210 S Walnut Street

Presenter: Rebecca Brehmer – Projects/Planning Coordinator

An application for a Certificate of Appropriateness has been submitted by Jerry Seddon for exterior alterations of 210 S Walnut Street.

Recommended Action:

1. Hold a public hearing;
2. Motion to approve COA 2023-06 for exterior alterations at 210 S Walnut Street based on the standards provided.

b. Swansboro Historic Preservation Commission Opening Statement

Presenter: Rebecca Brehmer – Projects/Planning Coordinator

Staff was asked to research and draft an opening statement to be reviewed at each meeting that would inform the public in attendance at meetings of the standards for public comments and decisions to be made by the commission.

Recommended Action: Motion to approve recommended opening statement.

c. Minor Work and Staff Approval Application Report

Presenter: Rebecca Brehmer – Projects/Planning Coordinator

IV. Chairman/Board Thoughts/Staff Comments

V. Public Comments

VI. Adjournment

TOWN OF SWANSBORO
HISTORIC PRESERVATION COMMISSION
REGULAR MEETING MINUTES
May 16, 2023

Call to Order

The meeting of Swansboro Historic Preservation Commission was called to order at 5:30 PM. Board members in attendance Kim Kingrey, Christina Ramsey, Jonathan McDaniel, Ed Binanay. alternate Gregg Casper, alternate member Eric Young. Elaine Justice was absent.

Approval of Minutes

On a motion by Christina Ramsey, seconded by Kim Kingrey the April 18, 2023, regular meeting minutes were unanimously approved.

Business

A. Certificate of Appropriateness/222 Elm Street

The public hearing was opened at 5:34 PM.

Ed Binanay recused himself and Alternate Eric Young was seated in order to hear Certificate of Appropriateness for Mr. Binanay's property.

Rebecca Brehmer, Projects/Planning Coordinator presented the board with the owners' request for removal of an overgrown tree (over 8" in diameter) in front of their home.

Cynthia Binanay, owner of the property stated the reason for the request was due to the tree becoming a source of concern with its roots burrowing and growing into the home's foundation. The tree is also obstructing the electrical wire outside.

The public hearing was closed at 5:36 PM.

On a motion by Kim Kingrey and seconded by Christina Ramsey COA 2023-05 was unanimously approved based on the criteria from the UDO Section 8 Foundations.

SECTION 8 FOUNDATIONS.

8.1 Foundations - Standards

- 1) Retain and preserve original and historic foundations and related elements wherever possible, including pier size, vents, grilles, lattice, materials, and other significant details.
- 2) Retain and preserve existing historic materials wherever possible, rather than replace. For repairs or rebuilding, select new brick, mortar, ballast stones, and other materials to match the historic materials as closely as possible in all respects.
- 3) New vents or access doors should be centered between piers. Use inconspicuous vents, such as black iron or dark plastic, rather than unpainted aluminum. Locate access doors and other new openings in areas not visible from public view.
- 4) For infilling between existing brick piers, construct a curtain wall that is recessed approximately 1" to 2" back from the outer face of the piers so the original piers stand out; use this treatment for both old and new foundations. Flush foundations and infill are not appropriate.

Concrete block may be used only if covered with a veneer of brick or sand-finished stucco. Leave foundations under porches open wherever possible to promote air circulation to prevent rot and deterioration; use wood lattice or grilles to enclose.

5) Wood grilles or lattice are appropriate infill if compatible with the period or style of the structure. Stock or lightweight wood lattice is not appropriate in areas in the public view.

6) Existing unpainted historic foundations should not be painted. Previously painted foundations should be repainted an appropriate color, such as white or whitewash, dark green, or brick red. Avoid removing paint from a previously painted foundation. (See Brickwork and Masonry standards).

7) Locate new utilities and mechanical equipment such as package unit furnaces, heat pumps, and air conditioning coils at the rear or other area not seen from public view. Utilities should never be located at the front of a structure or site. Provide screening with plantings, fences, or paint treatments.

Review of Staff Approvals

Rebecca Brehmer, Projects/Planning Coordinator reviewed the following staff approvals.

- 106 S. Walnut Street replace siding on the front of garage with same wood material, siding, and paint color, as the house.

OUASI-Judicial Development Decisions

Planner Andrea Correll, Presented The UNC School of government Development Decisions Power Point attached herein as *Attachment A*.

Chairman/Board Thoughts/Staff Comments:

Andrea Correll, Planner informed the board that the workshop that John Wood presented on April 22, 2023, concerning window restoration was very informative and it was a success. The board received educational credit. The Board members were interested and would like to be informed if he has any other workshops in the area.

Board comments

- Kim Kingrey would like to continue to update the ordinance, for example on disallowing palm trees, vinyl windows, etc.
- Kim Kingrey requested that anyone that would like to speak on a case needs to be instructed that their information must be factual, and a time limit be placed on how long someone would be able to speak.

Public Comments

None

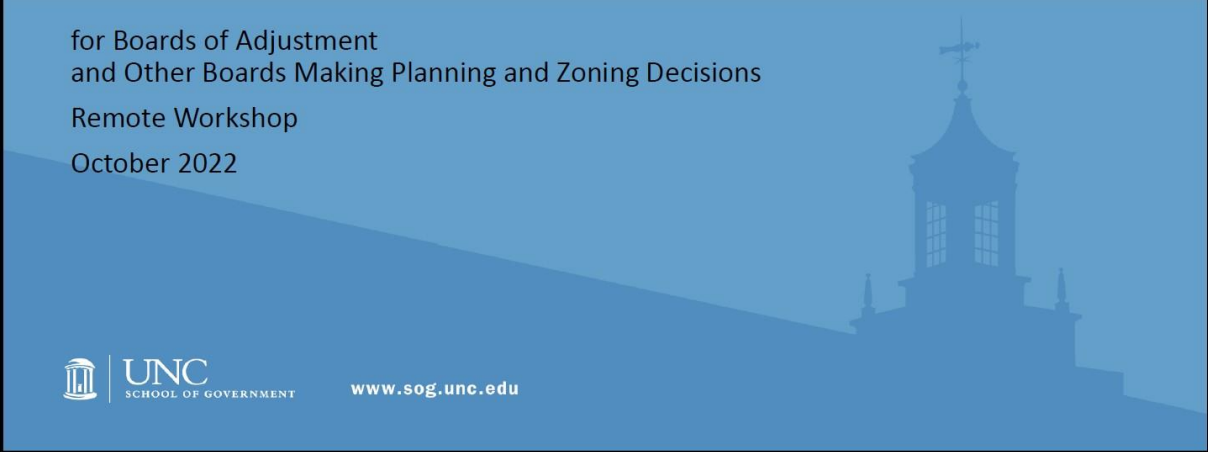
Adjournment


The meeting adjourned at 6:35 PM.

Quasi-Judicial Development Decisions

for Boards of Adjustment
and Other Boards Making Planning and Zoning Decisions

Remote Workshop
October 2022




 www.sog.unc.edu

Quasi-Judicial Decision

Process of adjudicating how the general law applies to a particular situation based on an evidentiary record – G.S. 160D-406

Two key responsibilities:

- 1) Determine contested facts
- 2) Apply standards that require judgment and discretion



Quasi-Judicial Decision

What it is not

Opportunity to decide what standards should be applied

Must apply only the standards already in ordinance

Based on public opinion

Must be based on competent, substantial, material evidence properly in the record



Due Process

- Clear guiding standards
- Notice
- Opportunity to be heard
- Impartial decision-makers
- Decision based on the evidentiary record
- Right to appeal



Steps in the Process

1. Notice of Hearing
2. Hearing Preliminaries (including recusal of members with conflicts)
3. Evidentiary Hearing (including swearing in of witnesses)
4. Voting and Final Decision
5. Appeals

Statutory reference: G.S. 160D-406



Bias

Board member cannot participate if member has a fixed opinion that is not susceptible to change



Conflicts of Interest

- A board member must recuse himself or herself if:
 1. [*Financial*] The outcome would have a direct, substantial, and readily identifiable financial impact
 2. [*Relationship*] The board member has a close family, business, or associational relationship with an affected person
 3. [*Neutrality*]: The board member has undisclosed ex parte communications or is biased



Ex Parte Communication

- Contacts with a party outside of the hearing
- Should be avoided
- Must be disclosed



Evidentiary Hearing: Common Order

- Opening
- Introduction of the case (staff or chair)
- Applicant presents
- Other parties present
- Non-party witnesses present
- Rebuttal from applicant and other parties
- Deliberation
- Decision

Discussion 1 – Who Can Participate?

The board of adjustment is considering a variance request for a major development downtown. Any recusals?

- 1) Board member **Russell** went to high school with the applicant. His brother-in-law is a business partner with the applicant.
- 2) Board member **Sara** currently serves on the Board of Adjustment and is campaigning for a seat on Town Council. Last week during a campaign event Sara proclaimed “There’s just too much development. I’m gonna shut it ALL down. Especially that monstrosity proposed for downtown.”
- 3) Board member **Tameka** didn’t do a thing. She heard those lawyers from the School of Government talk about bias and ex parte communications so she did not visit the site, nor did she review the application materials or staff report. She arrived with a clear mind and a clean conscience.

Building the Record

“Every quasi-judicial decision shall be based upon **competent, material,** and **substantial** evidence in the record.”

- Trustworthy and reliable
- Related to the standards
- Sufficient to support a conclusion

Initial Evidence

- Application
- Staff Analysis
- Site Visits

Witness Testimony

Should be:

- Sworn or affirmed
- Factual
- Focused on standards and land use impacts
- Supported by first-hand knowledge or by documentary evidence

Should not be:

- Unsworn
- Personal opinion
- Focused on owner or residents
- Supported by
 - Mere speculation
 - Vague assertions
 - Unsubstantiated fears

Documentary Evidence

- Written materials can be submitted and distributed prior to hearing (application, staff reports, documents)
- Documents (including photos, maps, studies, letters, etc.) submitted become part of record
- Clearly label each
- All objections made at hearing

Outside Evidence

Generally, all evidence must be presented at hearing

Ex parte evidence – site visits permissible, but must avoid discussing substance and must disclose site visit at hearing, along with any key information observed

Hearsay Testimony – can accept, but cannot use as basis for key findings

Application – Can accept and use documents that are part of application

“In quasi-judicial proceedings, no board or council member should appear to be an advocate for nor adopt an adversarial position to a party, bring in extraneous or incompetent evidence, or rely upon ex parte communications when making their decision.”

PHG Asheville, LLC v. City of Asheville

Discussion 2 – Is it good evidence?

- A. A petition signed by 25 neighbors opposing the project and outlining the ways in which it is out-of-character for the neighborhood.
- B. A sworn statement from the minister at Joe Developer’s church stating that Joe is an upstanding member of the community and volunteers at the homeless shelter.
- C. Testimony from a neighbor and salon owner that the apartments will injure her property value.
- D. A letter from Joe Developer’s traffic engineer about why, in her professional opinion, any traffic impacts will be reasonably accommodated by the proposed street improvements.



Deliberation

- In open session
- Focused on the applicable standards
- Based on the evidence in the record





Burden

- Generally, applicant bears the burden to produce sufficient evidence to show standards are met
- Burden shifts to opponents if applicant provides sufficient evidence to support his or her case



Determine Contested Facts

For example...

- (For a variance) What makes the situation peculiar to the site?
- (For a certificate of appropriateness) What about the property is in keeping with the character of the district?



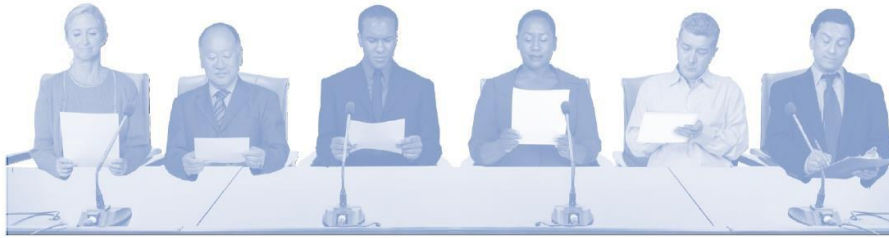
Motion(s)

- Findings of Fact (sometimes separate)
- Approve, approve with conditions, or deny
- Include reasoning based on the evidence and standards



Written Decision

- May prepare draft prior to hearing
- Final document may be prepared after the meeting (usually by staff or attorney)
- Must accurately reflect action and reasoning of the board
- Approved by board
- Signed by chair or authorized member



Appeals

- 30 days from later of effective date or date of decision
- To Superior Court
- On the record



Historic Preservation Commission Meeting Agenda Item Submittal

Item To Be Considered: **Certificate of Appropriateness/210 S Walnut Street**

Board Meeting Date: **July 18, 2023**

Prepared By: **Rebecca Brehmer – Projects/Planning Coordinator**

Overview: An application for a Certificate of Appropriateness has been submitted by Jerry Seddon for exterior alterations of 210 S Walnut Street.

The house is zoned R6SF and is a contributing structure to the Historic District. The alterations include in-kind routine maintenance by repairing the wood siding present on the main part of the house and by adding the same appropriate wood siding to the rear bump out and to replace the current back door with a French door. Both requests appear to be compliant with Section 4: Exterior Wall Covering, Trim, and Ornamentation and Section 5: Windows and Doors.

Background Attachment(s):

- 1. COA-2023-06 application
- 2. Section 4: Exterior Wall Covering, Trim, and Ornamentation & Section 5: Windows and Doors
- 3. Aerial location map
- 4. National register description of the home

Recommended Action:

- 1. Hold a public hearing;
- 2. Motion to approve COA 2023-06 for exterior alterations at 210 S Walnut Street based on the standards provided.

Action: _____



SWANSBORO HISTORIC PRESERVATION COMMISSION CERTIFICATE OF APPROPRIATENESS

Application # 2023-06

I Hereby apply to the Swansboro Historic Preservation Commission for a Certificate of Appropriateness (COA) for the structure, project, or proposed restoration, modification or change one the following property located within the Historic District:

NAME: Jerry Seddon

MAILING ADDRESS: 210 S. Walnut Street

ADDRESS OF AFFECTED PROPERTY: " " "

PHONE NUMBERS: (Home) 631-697-3092 (Work)

Indicate if you need a pre-application review: Yes No

(Note: A pre-application review is required for all projects exceeding a cost of \$10,000 and/or involving new construction projects with a minimum square footage of 1,000 sq. ft. or addition of 500 sq. ft.)

INSTRUCTIONS:

- 1) Each application must include a written property description. In the space provided or on additional sheets, describe the nature and extent of the proposed work to include a listing of materials and dimensions. Provide sufficient detail to allow the Swansboro Historic Preservation Commission (SHPC) to make an informed decision regarding appropriateness.
- 2) For each specific type of activity, attach the following materials: (check the applicable category)

EXTERIOR ALTERATION: Photograph(s) and sketch(es) showing existing conditions and proposed changes for each effected area.

NEW CONSTRUCTION: a) Plot plan showing all new construction on proposed site; b) preliminary or final drawings showing proposed design of new construction or new addition (elevations required); c) descriptions, samples, and specifications indicating materials and textures used on exterior construction; d) statement by owner of how proposed new construction meets the intent of the SHPC design guidelines for projects involving new buildings with more than 1,000 sq. ft. or addition of 500 sq. ft.; and e) deed of property.

MOVING / DEMOLITION: a) Photographs of building to be moved or demolished (including photos of all elevations and a streetscape); b) written description of reason for move or demolition; and c) for moving requests, a photograph of proposed site for relocated building and a plot plan showing exact building location with pertinent dimensions.

ALL SKETCHES, DRAWINGS, COLOR CHIPS, ETC. MUST BE SUBMITTED IN MULTIPLES OF TWELVE (12) and "8 1/2 x 11" SIZE PAPER IS PREFERRED.

PROJECT DESCRIPTION (Attach additional sheets if necessary):

The small pump out on the back of the house was in extreme disrepair. We are going to remove asbestos siding and replace with the same as the rest of the home. We would like to add a French door instead of what's currently there.

The applicant(s) and/or his/her representative(s) are required to appear before the Swansboro Historic Preservation Commission to present, discuss and clarify the application the night of the meeting. If the applicant is not the owner of the property a written statement by the owner is required prior to the meeting for the applicant to pursue the COA.

Any applicant(s) requiring a "CAMA" permit, must submit the approved CAMA application with CAMA official(s) signature(s), prior to the review of the COA by the Swansboro Historic Preservation Commission.

All applications become the property of the Swansboro Historic Preservation Commission for the Town of Swansboro. This application shall be completed and returned to the Code Enforcement Department at least seventeen (17) days **before** the Swansboro Historic Preservation Commission meeting at which the application may be considered.

It is the policy of the Swansboro Historic Preservation Commission that the board shall act as one body. Accordingly, individual members should not give personal opinions on applications submitted to the Swansboro Historic Preservation Commission, and no such individual opinion shall bind the SHPC in any way.


Signature of Applicant

6/16/23
Date

STAFF USE ONLY

Application received by: Rubia Baskin Date: 6/16/23

Application reviewed with applicant by: _____ Date: _____
How: In person _____ By Phone

Fee Paid: \$205 Receipt Number R00005167

Comments: replace siding in-kind to the rest of the home and replace back door with french doors.





SECTION 4 EXTERIOR WALL COVERING, TRIM, AND ORNAMENTATION.

4.1 Exterior Wall Covering, Trim, and Ornamentation - Standards

- 1) Preserve and maintain existing original exterior wall covering, trim, ornamentation, and other original decorative elements.
- 2) Preserve and repair original elements wherever possible. Use preservation techniques which encourage repair, such as epoxies, splicing, and patching where applicable, rather than wholesale replacement.
- 3) Replace historic elements only where the original is too deteriorated to repair. If replacement is necessary and justifiable, use new replacement elements that match the original as closely as possible in all properties - shape, profile, texture, and detailing.
- 4) Prepare surfaces for painting using the gentlest means possible. Low-pressure power washing should be used only after a test panel of washing has been performed by the contractor and reviewed by the owner for excessive damage. Sand blasting and high- pressure water blasting are not appropriate treatments.
- 5) The use of synthetic or pressed wood, vinyl, cement composite, or aluminum siding is not appropriate on buildings which contribute to the character of the historic district (refer to the Synthetic Siding Policy). The SHPC may allow replacement of existing synthetic siding with new synthetic siding if the proposed replacement will be more in keeping with the original appearance of the structure. NOTE: Artificial siding with a heavy wood grain will not be permitted.
- 6) Remove synthetic siding from existing contributing buildings wherever possible. Remove in the gentlest possible manner to avoid damage to the wood below.

4.2 Synthetic Siding Policy

The use of synthetic siding materials is not permitted within the historic district. Modern synthetic or substitute materials such as vinyl, aluminum, pressed wood, or cement products shall not be used to cover or replace wood siding on structures that contribute to the character of the historic district, or on new structures. The appearance, surface textures, details, and other key visual characteristics of synthetic sidings are not appropriate in the district.

In the case of structures that are presently covered with synthetic siding, the Swansboro Historic Preservation Commission may allow for a change to another synthetic siding if the proposed new siding is more in keeping with the original appearance of the structure or the character of the district. In an effort to prevent the removal or damage of architectural details, the SHPC may specify which areas of the structure shall be covered with synthetic siding products as a condition of approval.

Synthetic siding products have a number of potential drawbacks, which far outweigh their benefits, including the following:

- The application of artificial siding over wood may cause moisture retention and eventual deterioration;

-The insulation value of artificial siding and materials applied behind the siding is often overrated and of minimal value;

-Artificial siding may cause house fires to burn longer and hotter, and may make fire extinguishing more difficult;

-Techniques used in the installation of artificial siding are likely to cause damage to the original siding and trim underneath, including leakage of water through improperly detailed or uncaulked joints;

-Artificial siding prevents the detection of deterioration of original wood elements that are hidden from view.

(Ord. 2005-O3, passed 3-15-2005; Am. Ord. 2021-O3, passed 5-24-2021)

SECTION 5: WINDOWS AND DOORS.

5.1 Windows and Doors - Standards

1) Retain and preserve historic windows and doors, including all significant related elements such as frames, sashes, shutters, hardware, old glass, sills, and moldings.

2) Repair existing historic windows and doors where possible, rather than replacing entire window or door units. Use techniques such as wood epoxies and wood patches to repair and strengthen deteriorated wood elements. Replace only those elements that cannot be repaired.

3) Use replacement windows and doors that match the existing historic elements as closely as possible. If replacement windows or doors are required, consider first replacing only the deteriorated element, such as a single sash or door, rather than the entire frame or unit. Any new replacements shall match the original in all dimensions and detailing as closely as possible.

4) Use storm windows to improve energy efficiency where needed. New storm units should have a baked-on paint finish compatible with the color of the house. Unpainted aluminum is not appropriate. Storm windows for double-hung sashes shall have horizontal dividers that are in alignment with the horizontal meeting rails or the original upper and lower sashes. Storm windows are usually a "minor works" item.

5) Replacement of historic windows and doors for the sole purpose of improved thermal performance is not appropriate. Storm windows and doors should be used.

6) Tinted glass is not appropriate in the historic district in any area visible from the public view. Energy-saving or "low-E" glass may be used only if it is not tinted.

7) False muntins or snap-in grilles are not appropriate for windows visible from public view. New thermal-pane windows must match the original windows in overall size and opening area. New windows should have either true divided lights or three-dimensional grilles on both the interior and exterior of the window. Standard thermal-pane windows will be permitted on the rear or other areas not visible from the public

view. Existing original frames should be retained and reused with the addition of new siding tracks to hold the replacement sashes.

8) Use storm doors to improve energy efficiency where needed. New storm doors should be compatible with the original exterior doors and with the style and period of the structure. Wood storm doors of the full-view or large single-pane type are most appropriate because they do not obscure the original door. Louvered wood doors are also appropriate. Metal storm doors should be the full-view type and have a baked-on enamel paint finish in a color that is compatible with the colors of the structure. Standard or non-historic storm doors are appropriate only on the rear or other area not visible from public view. Screen doors should be appropriate for the period and style of the structure.

9) Preserve and repair original or historic shutters, or replace in-kind. It is appropriate to add louvered shutters to a historic structure if there is evidence that it once had blinds. All new shutters shall be of wood, and installed so that they will fit the window frame opening when closed and shall be of the correct proportions for each window. New blinds shall be provided with operable hardware, consisting of hinges, pintles, and holdbacks located in the appropriate position. Shutters made of synthetic or substitute materials, such as vinyl, are not appropriate.

10) Original or historic windows or doors and their related frames and trim shall not be altered or removed on the main facades visible from the public view unless this action is part of a documented restoration to an earlier appearance.

11) New windows and doors should not be added to the primary facades or front elevation, and are usually not appropriate on any other area seen from the public view. New window and door openings shall not alter the historic character of the building nor cause damage to historic materials or other significant architectural features. They must be detailed and sized to be compatible with the existing structure.

(Ord. 2005-O3, passed 3-15-2005; Am. Ord. 2021-O3, passed 5-24-2021)



United States Department of the Interior
National Park Service

National Register of Historic Places Continuation Sheet Swansboro Historic District, Onslow County

Section number 7 Page 17

ON 817	C	119.	#214a	Early 20th c.		Board-and-batten sided outbuilding
(ON 816)	N	120.	#212	ca.1950	1	Aluminum-sided house with engaged front porch.
ON 815	C	121.	#208	1908	2	<u>Cicero Davis House</u> ; L-shaped house with wrap-around one-story porch and side and back additions, wood-shingling in front gables. Davis was a ship captain and employee of the Swansboro Land and Lumber Company.
ON 814	C	122.	#206	ca.1901	2	<u>Fannie B. Oglesby House</u> ; three-bay I-house, former with center-hall plan, with decorative two-tier front porch, one-story ell.
ON 813	C	123.	#204	ca.1901	1	<u>Abram Bell House</u> ; three-bay two-room plan house, front porch, ell. Bell was a sailor.



C 121. #208 1908 2 Cicero Davis House; L-shaped house with wrap-around one-story porch and side and back additions, wood-shingling in front gables. Davis was a ship captain and employee of the Swansboro Land and Lumber Company.



Historic Preservation Commission Meeting Agenda Item Submittal

Item To Be Considered: **Swansboro Historic Preservation Commission Opening Statement**

Board Meeting Date: **July 18, 2023**

Prepared By: **Rebecca Brehmer – Projects/Planning Coordinator**

Overview: Staff was asked to research and draft an opening statement to be reviewed at each meeting that would inform the public in attendance at meetings of the standards for public comments and decisions to be made by the commission.

The recommended statement would read as follows:

Quasi-judicial Decisions are based on competent, substantial, material evidence properly in the record. All that wish to speak must be sworn in at the beginning of the meeting. If your testimony meets these standards, then sign up and please be sworn in to speak.

Certificate of Appropriateness requests must be in keeping with the special character of the historic district and decisions must be based on the review criteria, contained in §152.482 of the Town Unified Development Ordinance.

Recommended Action: Motion to approve recommended opening statement.

Action: _____



Historic Preservation Commission Meeting Agenda Item Submittal

Item To Be Considered: Minor Work and Staff Approval Application Report

Board Meeting Date: July 18, 2023

Prepared By: Rebecca Brehmer, Projects/Planning Coordinator

Overview:

APPROVALS REPORT FOR LOCAL HISTORIC DISTRICT

Minor Works

Date: June 7, 2023

Applicant: Frank Weaver

Address: 216 Water Street

Action: Replace front doors from 6' fixed double doors to 6' sliding doors to help with water entry into the home.

Status: Approved



216 Water Street

Action: _____

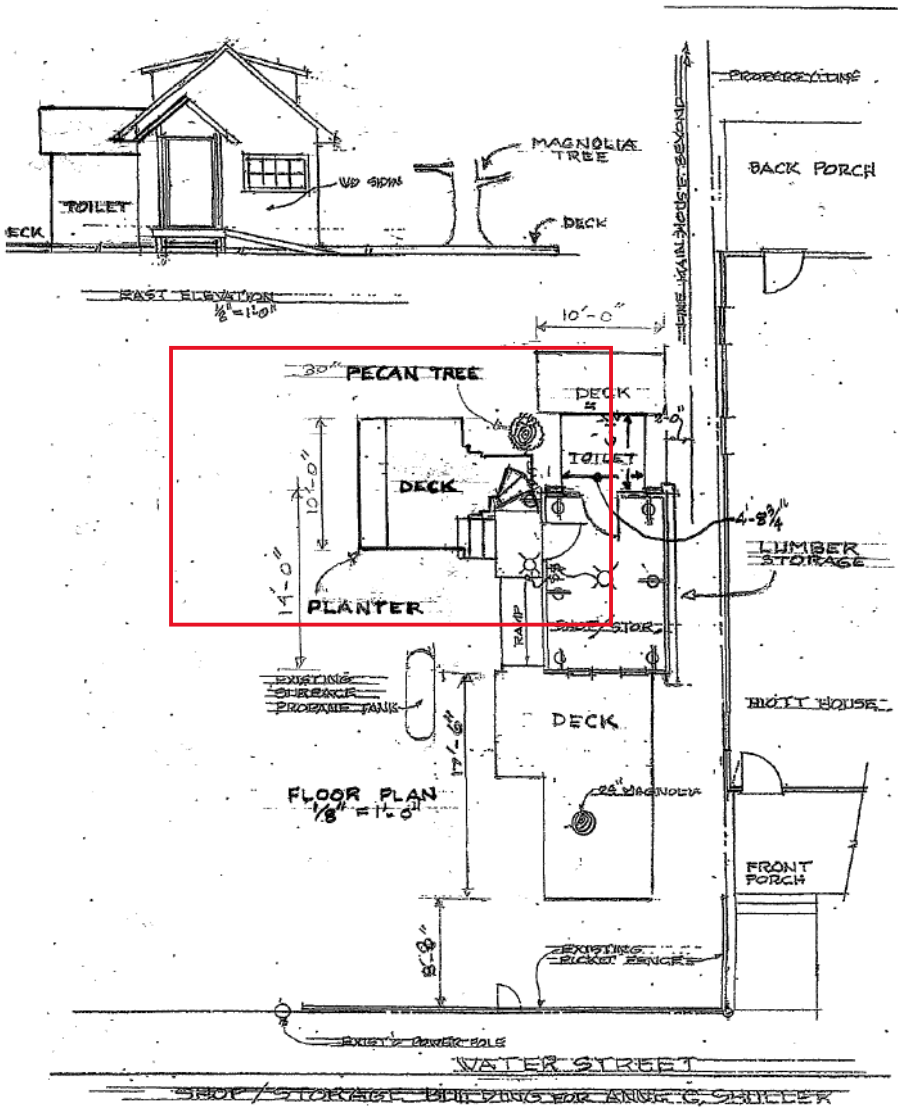
Date: June 18, 2023

Applicant: Anne Shuller

Address: 140 Front Street

Action: Build 6'x10' ground level deck with attached planter and railing.

Status: Approved



140 Front Street

Date: June 23, 2023

Applicant: Jordan Proctor

Address: 209 Water Street

Action: Remove vinyl siding and restore and paint original siding white and repair rotten wood on back deck.

Status: Approved



209 Water Street

Date: June 23, 2023

Applicant: Jonathan McDaniel

Address: 114 Elm Street

Action: Replace metal garage door with historic wood plank barn doors painted white to match structure.

Status: Approved



114 Elm Street

Staff Approvals

Date: May 17, 2023

Applicant: Joseph and Kimberly Kingrey

Address: 212 Elm Street

Action: Put up an 8.5' long section of picket fence at 3.5' tall in back yard to cover heat pump from view. The fence to match the existing picket already present in the backyard.

Status: Approved



212 Elm Street

Date: June 5, 2023

Applicant: JoAnn Parker

Address: 129-2 Front Street

Action: Install sign above store front 4' long and 32" in height. The sign is the shape of an elephant and a dark red color from the color palette.

Status: Approved



129-2 Front Street

Date: June 16, 2023

Applicant: Joseph and Kimberly Kingrey

Address: 212 Elm Street

Action: Perform maintenance on detached garage and build new ground level deck (patio) in kind to what it is replacing.

Status: Approved



212 Elm Street

Date: June 23, 2023

Applicant: Jonathan McDaniel

Address: 114 Elm Street

Action: Repair rotten wood on front porch and steps.

Status: Approved



114 Elm Street