



Project Address: 1 Buttonwood Court (District 17 – Alder Baldeh)
Application Type: Conditional Use
Legistar File ID # [55907](#)
Prepared By: Colin Punt, Planning Division
Report includes comments from other City agencies, as noted.
Reviewed By: Kevin Firchow, AICP, Principal Planner

Summary

Applicant: Michael J. Campbell; Campbell Capital Group, LLC; 2002 Summit Blvd. #300; Brookhaven, GA 30319

Owner: American Family Mutual Insurance Co.; 6000 American Parkway; Madison, WI 53783

Requested Action: Approval of a conditional use for dwelling units in a mixed-use building (\$28.086(2) MGO) to construct a four-story mixed use building with commercial space and apartments at 1 Buttonwood Court.

Proposal Summary: The applicant is seeking approval to build a four-story building at 1 Buttonwood Court with first floor commercial/retail space, market rate apartments, and structured parking.

Applicable Regulations & Standards: The applicant is requesting conditional use approval. Standards for conditional use approval are found in §28.183 MGO.

Review Required By: Plan Commission

Summary Recommendations: The Planning Division recommends that the Plan Commission find the standards met and **approve** the conditional use to construct a four-story building with first floor commercial/retail space, market rate apartments, and structured parking at 1 Buttonwood Court subject to input at the public hearing and the conditions from reviewing agencies in this report.

Background Information

Parcel Location: The subject site is composed of two parcels located between Buttonwood Court and American Parkway, northeast of Buttonwood Drive. The site is 7.45 acres (324,367 square feet). It is within Aldermanic District 17 (Alder Baldeh) and the Sun Prairie School District.

Existing Conditions and Land Use: The site, zoned SEC (Suburban Employment Center District), is currently vacant.

Surrounding Land Uses and Zoning:

North: One-story office building and open space, zoned SEC (Suburban Employment Center District);

West: Across Buttonwood Court, a one-story office building and a vacant lot, zoned SEC;

South: Across Buttonwood Drive, a three-story bank office building, zoned SEC; and

East: Across American Parkway, a small one-story medical clinic and vacant lots, zoned CC (Commercial Center District).

Adopted Land Use Plan: The [Comprehensive Plan](#) (2018) recommends community mixed use (CMU) for the site. The [Rattman Neighborhood Development Plan](#) (1992) recommends office uses for this site. An updated to this Neighborhood Development Plan is currently considering a CMU recommendation for this location.

Zoning Summary: The subject property is zoned SEC (Suburban Employment Center District):

Requirements	Required	Proposed
Lot Area (sq. ft.)	43,560	324,360
Lot Width	100 ft	390 ft
Front Yard Setback	25 ft	60 ft
Side Yard Setback	15 ft	164 ft, 80 ft
Rear Yard Setback	30 ft	740 ft
Maximum Lot Coverage	75%	46%
Maximum Building Coverage	50%	21%
Floor Area Ratio	1.0	.85
Minimum Building Height	22 ft	41 ft
Maximum Building Height	None	41 ft

Site Design	Required	Proposed
Number Parking Stalls	No minimum, 687 maximum	379
Accessible Stalls	8	12
Loading	No	No
Number Bike Parking Stalls	299	299
Landscaping	Yes	Yes
Lighting	Yes	Yes
Building Forms	Yes	Flex Building

Other Critical Zoning Items	Barrier Free (ILHR 69), Utility Easements
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Table Prepared by Jacob Moskowitz, Assistant Zoning Administrator

Environmental Corridor Status: The property is not located within a mapped environmental corridor.

Public Utilities and Services: The site is served by a full range of urban services.

Project Description

The applicant is seeking approval to build a mixed-use multi-family development in the American Center. The proposed four-story development will feature 270 dwelling units, resident amenities, and 2,462 square feet of retail space over 270 underground parking spaces. The dwelling unit housing mix includes 199 one-bedroom units and 71 two-bedroom units, for a total of 341 bedrooms.

The large building, over 480 feet long, is composed of two main parts. A square portion to the southeast is composed of units lining a double-loaded corridor with a resident courtyard in the center. A second portion surrounding a courtyard that opens out to the east is connected to the southeast portion at the third and fourth floors over a two-story tall drive-under that enables vehicles to access a small parking lot within this northwesterly courtyard. Vehicle traffic through the parking lot and drive-under connects American Parkway on the east to the surface parking and Buttonwood Court to the west.

The proposal provides 270 underground structured parking spaces. The underground parking is accessed by a garage door on the west façade of the building. Buttonwood Court provides the closest public access to the

underground parking entrance, but a drive from American Parkway through the center of the development also connects to the underground parking entrance. In addition to the underground structured parking spaces, 109 surface spaces are proposed, predominantly on the west (Buttonwood Court) side of the building, with smaller lots to the northeast and within the east-facing open courtyard. 299 bicycle spaces, 243 within the structured underground parking area, and 56 short-term outdoor spaces, predominantly located on the south (Buttonwood Drive) side of the building and the open courtyard, near the two commercial spaces.

The building design features several materials types and colors, with pronounced vertical design elements. Cream and red brick are used primarily at the base of the building, extending up to the third floor in some locations. The majority of the upper three floors of the building are clad in fiber cement panels in white, light gray, and dark gray. These materials and colors are also used as trim in several locations. A wood grain-style siding and a gray board and batten fiber cement panel are used on the upper floors at the building's corners. The commercial areas have a conventional glazed storefront appearance under a metal canopy. Balcony railings appear to be a dark gray painted metal.

Proposed landscaping includes a number of canopy trees within and around the parking lot and around the perimeter of the site. Ornamental trees and shrubs surround the perimeter of the building at its base. Both courtyards include a variety of shrubs, ornamental grasses, perennials, and decorative paving. An outlot along American Parkway is currently planted with many existing trees. Most of these trees will remain, with some additional trees planted here as well. A retaining wall at the southern corner frames the lower level entrance at the low point of the site.

The applicant has indicated the two small commercial spaces will have hours of operation from 9 a.m. to 6 p.m. No further information regarding these spaces, such as specific use or prospective tenants, has been provided by the applicant. Depending on the future use of these spaces, further approvals may need to be considered by the Plan Commission.

The building's floor area is proposed to be 252,576 square feet, or 344,984 square feet including parking. The site is approximately 7.45 acres, which results in a density of 36.2 dwelling units per acre.

The applicant indicates they intend to begin construction by late 2019, with completion in summer of 2021.

Analysis & Conclusion

This request is subject to the standards for conditional uses. This section begins with a summary of adopted plan recommendations, followed by conditional use standards, and finally a conclusion.

Adopted Plan Recommendations

The [Comprehensive Plan](#) (2018) recommends community mixed use (CMU) for the site. The CMU category includes areas supporting an intensive mix of residential, commercial, and civic uses serving residents and visitors from the surrounding area and the community as a whole. Buildings of up to six stories and development of up to 130 dwelling units per acre may be permitted in CMU areas. The [Rattman Neighborhood Development Plan](#) (1992) recommends office uses for this site. This area is intended primarily for offices and corporate headquarters facilities, research and development facilities, and limited supporting uses. An update to this Neighborhood Development Plan (NDP) is currently considering a CMU recommendation for this location. This proposed land use recommendation would be consistent with the recommendations of the Comprehensive Plan. The Plan Commission is considering amendments to the [Rattman NDP](#) on June 24, 2019, at the same

meeting it is reviewing this proposal. The Common Council is expected to review and potentially adopt the amended NDP on July 2, 2019.

Conditional Use Standards

The applicant is requesting conditional use approval conditional use for dwelling units in a mixed-use building (§28.084(3)(c) MGO). In regards to conditional use approval standards, the Plan Commission shall not approve a conditional use without due consideration of the City's adopted plan recommendations, design guidelines, supplemental regulations, and finding that all of the conditional use standards of §28.183(6) MGO are met. While staff believes that all applicable standards of approval can be found met, staff has comments regarding two standards.

With regards to the City's adopted plan recommendations, as mentioned above, the proposal is consistent with the recommendations of the Comprehensive Plan. While the proposal is not consistent with the adopted recommendations of the adopted Rattman Neighborhood Development Plan (NDP), it is consistent with the proposed amendments to the NDP being considered by the Plan Commission at its June 24, 2019, meeting. As such, the Planning Division believe the proposal can be found consistent with adopted plans.

Conditional Use approval standard four requires that the establishment of the conditional use will not impede the normal and orderly development and improvement of the surrounding property. The building's great length, at nearly 500 feet, and the abrupt change of use from employment to the north and west to predominantly residential mixed use on this location have caused Staff to examine this approval standard. However, because of the changes to the NDP recommendations and the overall large scale of most development within the American Center, Staff believes this standard can be found met.

Conditional Use approval standard nine requires that the project creates an environment of sustained aesthetic desirability compatible with the existing or intended character of the area. While Planning Staff have concerns regarding the great length of the building and several items indicated below, the American Center Design Review Board has reviewed and approved the design, which indicates to Staff that the proposal could be found compatible with the existing and intended character of the area.

First, while the number of materials and colors for the building is appropriate considering its size, Staff recommend that the final design be altered to make each façade or section look more identifiable or individualized. The same general pattern repeats on all facades of the building as proposed, which, due to its size, Staff feels will contribute to a feeling of placelessness. By making each façade more identifiable, the design will create a better sense of place for its users.

Second, Staff recommends the applicant consider ways to make the two storefronts more prominent and visible from the street. The two leasable commercial spaces are quite small and set back approximately 90 feet from American Parkway due to American Center setback requirements. Architectural treatments and innovative signage could make the storefronts more visible and prominent.

Lastly, while Staff believes approval standard five can be found met, regarding adequate access and circulation, Staff has minor concerns about the access to the underground parking. Additional details showing access to the underground parking garage, especially the ramp and garage door, should be provided for staff review if the proposal is approved. Pedestrian and bicycle access to the garage should be added near the ramp.

Conclusion

Staff believes that it is possible for the project to meet the applicable conditional use approval standards, subject to input at the public hearing and the conditions recommended by the Planning Division and other reviewing agencies.

At time of writing, Staff has not received any written comments from the public.

Recommendation

Planning Division Recommendations (Contact Colin Punt 243-0455)

The Planning Division recommends that the Plan Commission find the standards met and approve the conditional use to construct a four-story building with first floor commercial/retail space, market rate apartments, and structured parking at 1 Buttonwood Court. This recommendation is subject to input at the public hearing and the conditions recommended by the Planning Division and other reviewing agencies.

Recommended Conditions of Approval: Major/Non-Standard Conditions are Shaded

Planning Division (Contact Colin Punt, 243-0455)

1. The hours of operation for the commercial spaces shall be 9 a.m. – 6 p.m. Future modifications to the hours of operation may be considered as a minor alteration of the conditional use following a recommendation by the District Alder.
2. Use or enhance architectural treatments to make the commercial spaces more prominent and visible from American Parkway.
3. Provide details regarding ramp to underground parking and garage door. Add pedestrian and bike access to the structured parking near the vehicle entrance.

Zoning Administrator (Contact Jacob Moskowitz, 266-4560)

4. Future use of the proposed commercial space may require an additional conditional use approval.
5. Show the refuse disposal area on the site plan. All developments, except single family and two family developments, shall provide a refuse disposal area. If the refuse disposal area is located outside the building, it shall be screened on four (4) sides (including a gate for access) by a solid, commercial-grade wood fence, wall, or equivalent material with a minimum height of six (6) feet and not greater than eight (8) feet. Submit a detail of the trash enclosure if provided outside the building.
6. Signage approvals are not granted by the Plan Commission. Signage must be reviewed for compliance with Chapter 31 Sign Codes of the Madison General Ordinances. Signage permits are issued by the Zoning Section of the Department of Planning and Community and Economic Development.

City Engineering Division (Contact Brenda Stanley, 261-9127)

7. 6.99 The submitted plans include an 8" diameter sanitary sewer lateral connected to a 6" lateral in the street. This is not a legal connection. If lateral for development needs to be larger than 6" diameter, developer will need to revise plans to connect to a manhole.
8. 4.9 Prior to approval, this project shall comply with Chapter 37 of the Madison General Ordinances regarding stormwater management. Specifically, this development is required to detain the storms between the 10 and 100 -year storm events, matching post development rates to predevelopment rates. Plat development addressed the 1-10 year events.
9. 6.2 All outstanding Madison Metropolitan Sewerage District (MMSD) charges are due and payable prior to Engineering sign-off, unless otherwise collected with a Developer's / Subdivision Contract. Contact Mark Moder (608-261-9250) to obtain the final MMSD billing a minimum of two (2) working days prior to requesting City Engineering signoff. (MGO 16.23(9)(d)(4))
10. 6.5 The site plan shall be revised to show all existing public sanitary sewer facilities in the project area as well as the size, invert elevation, and alignment of the proposed service. (POLICY)
11. 4.13 The Applicant shall submit, prior to plan sign-off but after all revisions have been completed, a digital CAD file (single file) to the Engineering Division with any private storm and sanitary sewer utilities. The digital CAD file shall be to scale and represent final construction. The CAD file shall be in a designated coordinate system (preferably Dane County WISCRS, US Ft). The single CAD file submittal can be either AutoCAD (dwg) Version 2013 or older, MicroStation (dgn) V8i Select Series 3 or older, or Universal (dxf) format and shall contain the only the following data, each on a separate layer name/level number:
 - a) Building Footprints
 - b) Internal Walkway Areas
 - c) Internal Site Parking Areas
 - d) Other Miscellaneous Impervious Areas (i.e. gravel, crushed stone, bituminous/asphalt, concrete, etc.)
 - e) Right-of-Way lines (public and private)
 - f) Lot lines or parcel lines if unplatted
 - g) Lot numbers or the words unplatted
 - h) Lot/Plat dimensions
 - i) Street names
 - j) Private on-site sanitary sewer utilities (including all connections to public sanitary)
 - k) Private on-site storm sewer utilities (including all connections to public storm)All other levels (contours, elevations, etc) are not to be included with this file submittal.
NOTE: Email CAD file transmissions are preferred to: bstanley@cityofmadison.com (East) or ttroester@cityofmadison.com (West). Include the site address in the subject line of this transmittal. Any changes or additions to the location of the building, sidewalks, parking/pavement, private on-site sanitary sewer utilities, or private on-site storm sewer utilities during construction will require a new CAD file.
12. 4.15 The Applicant shall submit prior to plan sign-off, electronic copies of any Stormwater Management Files including:
 - a) SLAMM DAT files
 - b) RECARGA files

c) TR-55/HYDROCAD/Etc

d) Sediment loading calculations. If calculations are done by hand or are not available electronically the hand copies or printed output shall be scanned to a PDF file and provided. (POLICY and MGO 37.09(2))

13. 4.21 Submit a draft Stormwater Management Maintenance Agreement (SWMA) for review and approval that covers inspection and maintenance requirements for any BMP used to meet stormwater management requirements on this project. Include copies of all stormwater, utility, and detail plan sheets that contain stormwater practices on 8.5x14 size paper in the draft document. These drawings do not need to be to scale as they are for informational purposes only. Once City Engineering staff have reviewed the draft document and approved it with any required revisions submit a signed and notarized original copy to City Engineering. Include a check for \$30.00 made out to Dane County Register of Deeds for the recording fee. City Engineering will forward the document and fee for recording at the time of issuance of the stormwater management permit. Draft document can be emailed to Tim Troester (west) at ttroester@cityofmadison.com, or Daniel Olivares at DAOlivares@cityofmadison.com final document and fee should be submitted to City
14. 4.6a This site appears to disturb over one (1) acre of land and requires a permit from the WDNR for stormwater management and erosion control. The City of Madison has been required by the WDNR to review projects for compliance with NR216 and NR-151 however a separate permit submittal is still required to the WDNR for this work. The City of Madison cannot issue our permit until concurrence is obtained from the WDNR via their NOI or WRAPP permit process. Contact Eric Rortvedt at 273-5612 of the WDNR to discuss this requirement. Information on this permit application is available on line <http://dnr.wi.gov/Runoff/stormwater/constrformsinfo.htm> (NOTIFICATION)
15. 4.8 The lots within this site plan are inter-dependent upon one another for stormwater runoff conveyance, and/or a private drainage system exists for the entire site an agreement shall be provided for the rights and responsibilities of all lot owners. Said agreement shall be reviewed and placed on file by the City Engineer, referenced on the site plan and recorded at the Dane Co Register of Deeds. (POLICY)
16. 4.9d Prior to approval, this project shall comply with Chapter 37 of the Madison General Ordinances regarding stormwater management. Specifically, this development is required to provide infiltration in accordance with Chapter 37 of the Madison General Ordinances.
17. 4.9g Complete an erosion control plan and complete weekly self-inspection of the erosion control practices and post these inspections to the City of Madison website - as required by Chapter 37 of the Madison General Ordinances.
18. 5.4 The applicant's utility contractor shall obtain a connection permit and excavation permit prior to commencing the storm sewer construction. MGO 37.05(7) This permit application is available on line at <http://www.cityofmadison.com/engineering/permits.cfm>.
19. 4.22 Provide additional detail how the enclosed depression(s) created by the parking entrance(s) to the below building parking area(s) is/are served for drainage purposes. The building must be protected from receiving runoff up through the 24-hr, 100-yr design storm. If the enclosed depression(s) is/are to be served by a gravity system provide calculations stamped by a Wisconsin P.E. that show inlet and pipe capacities meet this requirement. If the enclosed depression(s) is/are to be served by a pump system

provide pump sizing calculations stamped by a Wisconsin P.E. or licensed Plumber that show this requirement has been met.

20. 3.7 The Applicant's project requires the minor restoration of the street and sidewalk. The Applicant shall obtain a Street Excavation Permit for the street restoration work, which is available from the City Engineering Division. The applicant shall pay all fees associated with the permit including inspection fees. (MGO 16.23(9)(d)(6)) This permit application is available on line at <http://www.cityofmadison.com/engineering/permits.cfm>.

City Engineering Division – Mapping Section (Contact Jeff Quamme, 266-4097)

21. The pending Certified Survey Map application for this property shall be completed and recorded with the Dane County Register of Deeds (ROD) prior to issuance of any building permits for new construction. When the recorded CSM image is available from the ROD, the Assessor's Office can then create the new Address-Parcel- Owner (APO) data in GEO so that the Accela system can upload this data and permit issuance made available for this new land record
22. Portions of the Joint Driveway and Utility Easement through this site will need to be released. The Utility Easement will need to be released by Utilities serving this area prior to the City of Madison releasing its rights. Contact Jeff Quamme (jrquamme@cityofmadison.com) to coordinate the release by the City of Madison
23. The watermain is looped into this site. Confirm with the Madison Water Utility the requirement of a public watermain easement for the looped portion of the watermain through this site. If required the easement shall be granted on the pending Certified Survey Map.
24. Provide a recorded document providing rights of access across Outlot 5 adjacent to the southeast side of this proposed development.
25. The apartment numbers provided on the plan set are not valid and cannot be approved as shown for addressing. Submit a Floor Plan in PDF format to Lori Zenchenko (lzenchenko@cityofmadison.com) that includes a floor plan for each floor on a separate sheet for the development of a complete interior addressing plan. The Addressing Plan for the entire project shall be finalized and approved by Engineering (with consultation and consent from the Fire Marshal if needed) prior to the application submittal for the final Site Plan Approval with Zoning. The approved Addressing Plan shall be included in the final application. For any changes pertaining to the location, deletion or addition of a unit, or to the location of a unit entrance, (before, during, or after construction), a revised Address Plan shall be resubmitted to Lori Zenchenko to review addresses that may need to be changed and/or reapproved. The final revised Addressing Plan shall be submitted by the applicant to Zoning to be attached to the final filed approved site plans.

Traffic Engineering Division (Contact Sean Malloy, 266-5987)

26. The applicant shall submit one contiguous plan showing proposed conditions and one contiguous plan showing existing conditions for approval. The plan drawings shall be scaled to 1" = 20' and include the following, when applicable: existing and proposed property lines; parcel addresses; all easements; vision triangles; pavement markings; signing; building placement; items in the terrace such as signs, street light poles, hydrants; surface types such as asphalt, concrete, grass, sidewalk; driveway approaches, including

those adjacent to and across street from the project lot location; parking stall dimensions, including two (2) feet of vehicle overhang; drive aisle dimensions; semitrailer movement and vehicle routes; dimensions of radii; and percent of slope.

27. The Developer shall post a security deposit prior to the start of development. In the event that modifications need to be made to any City owned and/or maintained traffic signals, street lighting, signing, pavement marking and conduit/handholes, the Developer shall reimburse the City for all associated costs including engineering, labor and materials for both temporary and permanent installations.
28. The City Traffic Engineer may require public signing and marking related to the development; the Developer shall be financially responsible for such signing and marking.
29. All parking facility design shall conform to MGO standards, as set in section 10.08(6).
30. The applicant shall provide a clearly defined 5' walkway clear of all obstructions to assist citizens with disabilities, especially those who use a wheel chair or are visually impaired. Obstructions include but are not limited to tree grates, planters, benches, parked vehicle overhang, signage and doors that swing outward into walkway.
31. All bicycle parking adjacent pedestrian walkways shall have a 2 foot buffer zone to accommodate irregularly parked bicycles and/or bicycle trailers.
32. All pedestrian walkways adjacent parking stalls shall be 7 feet wide to accommodate vehicle overhang, signage and impediments to walkway movements. Any request for variance shall be submitted to and reviewed by City Traffic Engineering.
33. Per Section MGO 12.138 (14), this project is not eligible for residential parking permits. It is recommended that this prohibition be noted in the leases for the residential units.
34. City of Madison radio systems are microwave directional line of sight to remote towers citywide. The building elevation will need to be reviewed by Traffic Engineering to accommodate the microwave sight and building. The applicant shall submit grade and elevations plans if the building exceeds four stories prior to sign-off to be reviewed and approved by Austin Scheib, (266-4766) Traffic Engineering Shop, 1120 Sayle Street. The applicant shall return one signed approved building elevation copy to the City of Madison Traffic Engineering office with final plans for sign off.
35. The driveway slope to the underground parking is not identified in the plan set, Traffic Engineering recommends driveway slope under 10%; if the slope is to exceed 10%, the applicant shall demonstrate inclement weather mitigation techniques to provide safe ingress/egress to be approved by the City Traffic Engineer.
36. "Stop" signs shall be installed at a height of seven (7) feet at all class III driveway approaches, including existing driveways, behind the property line and noted on the plan. All directional/regulatory signage and pavement markings on the site shall be shown and noted on the plan.
37. The applicant shall show the dimensions for the proposed class III driveway including the width of the drive entrance, width of the flares, and width of the curb cut.

38. Provide pedestrian access to all building entrances from the public Right-of-Way.
39. The applicant shall work with Traffic Engineering to determine geometry for the proposed drive aisle and traffic circle.
40. The applicant shall make a connection to the existing path through the Northwest corner of their site to allow for a more direct route to the West.

Fire Department (Contact Bill Sullivan, 261-9658)

41. Provide fire access that complies with MGO 34 and the International Fire Code. The fire access exhibit provided does not meet our standard nor does it adequately document compliance with the applicable codes.
42. Confirm the existing property line between Lots 66 & 67 will be removed to allow construction of the building.

Water Utility (Contact Adam Wiederhoeft, 266-9121)

43. The proposed 8-IN diameter private water main may not create a looped system connecting at two points to the public water distribution system. Revise the Utility plan to depict the proposed private water supply system without looped connections to the public water main.

44. A Water Service Application Form and fees must be submitted before connecting to the existing water system. Provide at least two working days notice between the application submittal and the requested installation or inspection appointment. Application materials are available on the Water Utility's Plumbers & Contractors website (<http://www.cityofmadison.com/water/plumberscontractors>), otherwise they may be obtained from the Water Utility Main Office at 119 E Olin Ave. A licensed plumber signature is required on all water service applications. For new or replacement services, the property owner or authorized agent is also required to sign the application. A Water Meter Application Form will subsequently be required to size & obtain a water meter establish a Water Utility customer account and/or establish a Water Utility fire service account. If you have questions regarding water service applications, please contact Madison Water Utility at (608) 266-4646.
45. Madison Water Utility will be required to sign off as part of the approval review associated with this Land Use Application/Site Plan Review prior to the issuance of building permits for the proposed development.

Parks Division (Contact Kate Kane, 261-9671)

46. The following note should be included on the CSM: "LOTS WITHIN THIS SUBDIVISION ARE SUBJECT TO IMPACT FEES THAT ARE DUE AND PAYABLE AT THE TIME BUILDING PERMIT(S) ARE ISSUED."
47. Park Impact Fees (comprised of the Park Infrastructure Impact Fee, per MGO Sec. 20.08(2)), and Park-Land Impact Fees, per MGO Sec. 16.23(8)(f) and 20.08(6) will be required for all new residential development associated with this project. This development is within the North Park-Infrastructure Impact Fee district. Please reference ID#19031 when contacting Parks about this project.
48. Parks Division will be required to sign off on this CSM.