

Town of Sudbury

Planning and Community Development Department

Jody A. Kablack, Director

<http://www.sudbury.ma.us/services/planning>

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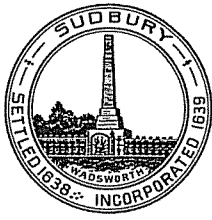
TO: Community Preservation Committee
FROM: JAK Jody Kablack, Planning Director
RE: Town Hall Architectural and Design Study Proposal
DATE: November 30, 2009

Following discussion of this proposal with the committee on November 18, 2009, I have researched the issue of CPA eligibility further, and submit the following additional information to support the proposal.

1. Research into the design of the original Town Hall is included in a thorough report of the Town Hall Committee in the 1930 Town of Sudbury Annual Report (attached). Town Meeting appropriated \$80,000 for the construction, which included \$15,000 to purchase the land. The report contains the rationale for the design and construction, and includes floor plans as well as exterior architectural design. From this research, it is concluded that the Town Hall was to contain ALL town offices at the time, including the Fire Department, Library, and functional use for the schools (auditorium, gymnasium, supper room) and public space (see attached article entitled "Memorial Town Halls in New England", by William Roget, Greeley). I have also ascertained that the Police Dept. was also located in Town Hall at that time (source – "Pictorial History of Sudbury" by Laura Scott).

2. Many other CPA historic renovation projects have created new municipal uses in historic residential buildings, such as community centers, senior centers, museums, and offices. In the Act, the term rehabilitation is defined as "extraordinary repairs to make historic resources functional for their intended use..." The Act does not say "original intended use", and the Community Preservation Coalition has opined that reconfiguration and change of use of historic buildings is possible, however cautions town to utilize CPA funds in accordance with the Secretary of the Interior Standards for Historic Preservation (attached). The first and second standards speak clearly to this issue:

1. A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.
2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.



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3. I have researched other CPA projects for Town Hall renovations, and all of them reconfigured space to modernize the buildings. There was always a non-CPA funding component to each building as well, but the overall change to the interior configuration did not make the other project ineligible.

4. I have spoken with members of the Permanent Building Committee, who recommend that we complete the requested Architectural and Design Study in order to make sure the project is feasible. A similar study was conducted for the Police Station in 2006. The fee for services for that project was \$25,000, however that project was solely for new construction. It is felt that renovation of a historic building may be more costly to study and design, and therefore the estimated cost of \$50,000 is still projected. I have included the Police Station Feasibility Study scope of work for your information.

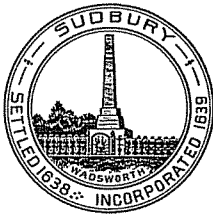
The Architectural and Design Study would: evaluate current Town/School departmental space needs; evaluate the potential amount of office space available in Town Hall; develop a preliminary design plan including evaluation of and recommendations for reconfiguration within the existing building and construction of an addition; preparation of site and building schematic drawings suitable for public presentation; preparation of a construction cost estimate; preparation of a list of CPA eligible items, including costs; attendance at meetings with representatives of the Permanent Building Committee and Town agents for discussion and review of project concepts and details.

The Community Preservation Coalition believes that the study is definitely an eligible expense, and has provided 2 relevant questions/answers from a recent Department of Revenue Seminar on use of CPA funds:

Q. What types of expenditures are considered project expenses?

Certain kinds of feasibility studies or preliminary work, such as design and engineering specifications, can be funded from CPA. The city/town can definitely fund a feasibility study or development of preliminary plans for possible allowable projects from the CPC operating budget since they would provide the information necessary for the CPC to recommend funding for the projects. Alternatively, the assessments and studies may qualify as start-up or preliminary project expenses, if they are associated with and necessary for an allowable project.

Q. Can CPA funds be used for feasibility studies for possible projects that are not allowable CPA purposes?



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No. The expenditures have to be directly related to an allowable project. We had a case where a town wanted to use CPA to fund a proposed community center, but town counsel said it did not come within the definition of recreational land under the CPA because it would be a gymnasium. G.L. c. 44B, §2. We agreed with that conclusion and therefore, did not see how CPA funds could be spent for a study on the feasibility of building it. Feasibility studies and need assessments can be funded with CPA monies to the extent they provide information to the CPC about possible CPA uses, *i.e.*, provide the CPC with information to evaluate potential eligible uses and make informed recommendations to town meeting. If the proposed use is not a CPA eligible project, however, then no CPA monies can be spent on it.

4. Below I describe 3 case studies to further illustrate the eligibility of Sudbury's project for CPA funding, and the need to fund an Architectural and Design Study prior to embarking on any construction.

Ashland Town Hall

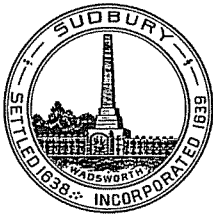
Ashland gutted the interior of their town hall to create a modern office building. The interior of this structure was very similar to Sudbury's Town Hall, with 2 large open rooms on the 1st and 2nd floors, and minimal original office space. Over the years, some of the open areas had been partitioned off with walls to create more office space. They used \$1.1 million of CPA funds, and \$3.1 million of general town funds to complete the project (total cost was \$4.2 million). They did not do a design or feasibility study. They went directly to an architect, who gave them a price estimate for the project. The Town Hall Renovation Committee determined which elements were CPA eligible, and made their proposal to the CPC for funding.

Bedford Town Center and Old Town Hall

These buildings were both originally constructed for different purposes than they are used currently. Both have been renovated into modern municipal space, including a community center, town offices, and non-profit offices (Bedford Center for the Arts, Bedford Community Access TV). Both projects used CPA funds for a portion of the renovations.

Wenham Town Hall

The renovation was a complete gut of the building. The historic building had been neglected and poorly renovated, at least twice, such that there was very little that they could salvage. They retained as many details as they could (e.g., window trim details, moldings, etc.), but took the building down to the support beams and exterior wall



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boards. The floor plan was completely re-invented and they added an extension to the back (which housed the HVAC, Elevator, and bathrooms), while maintaining the exterior appearance of the building. Everything is new from the walls, floors, and room layout, to the electrical, plumbing, and HVAC. The two historic safes that existed in the basement and the first floor were preserved in their original locations. They funded the entire project from CPA funds.

5. The Board of Selectmen supports this application.

Enclosures:

1. 1930 Town of Sudbury Annual Report
2. Memorial Town Halls in New England, by William Roget, Greeley
3. Secretary of the Interior Standards for Historic Preservation
4. Police Station Feasibility Study scope of work
5. Bedford Town Center and Old Town Hall
6. Wenham Town Hall CPC application
7. November 20, 2009 Letter from the Town Manager