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**CITY OF CAMBRIDGE**  
Community Development Department

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To: Planning Board

From: Community Development Department (CDD) Staff

Date: October 3, 2024

Re: Dormers Zoning Petition

**Overview**

Petitioner: City of Cambridge Board of Zoning Appeal  
("BZA")

Zoning Articles: Articles 2.00 (Definitions) and 8.000  
(Nonconformity)

Amendment Summary: Add a definition of "dormer" to Article 2.000  
and to amend the requirements related to  
adding dormers to nonconforming one- and  
two-family dwellings in Section 8.22.1.h.2 in  
order to allow certain dormer(s) construction  
as-of-right.

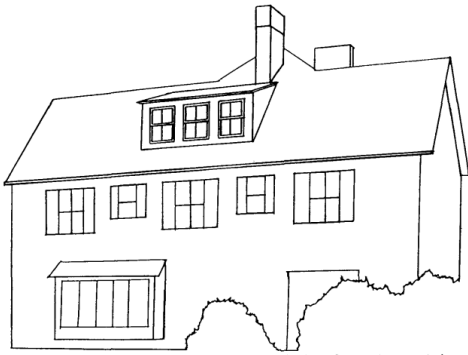
Planning Board Action: Recommendation to City Council

Memo Contents: Background information on zoning for  
dormers; summary of the Petition; and  
comments on proposed amendment.

## Background on Dormers

### *What are Dormers?*

Dormers are architectural features that may be added to a sloped roof of a building and are typically constructed to make more usable space within the attic of a residential house. Different types of dormers present in Cambridge include shed dormers and gable dormers, as illustrated in the graphics below.



Example of a shed dormer from the City's Design Guidelines For Roof Dormers



Example of a gable dormer from the City's Design Guidelines For Roof Dormers

### *How are Dormers Regulated?*

There is nothing in the Zoning Ordinance that prohibits dormers. Under normal base zoning, buildings with dormers simply have to conform to dimensional requirements like maximum height and FAR and minimum setback distances.

Because Cambridge has an old building stock that was largely constructed prior to the City's current zoning requirements, many buildings have characteristics that no longer conform to the City's dimensional requirements for one- and two-family structures. For example, the building's size and location on the lot might not align with current setback, floor area, and open space requirements. Modifying older buildings in Cambridge, such as by adding a dormer, can increase a non-conforming condition (often by adding new floor area to a building that is above the Floor Area Ratio (FAR) limit), which can require zoning relief. Historical Commission review may also be required depending on the age of the structure and where it is located.

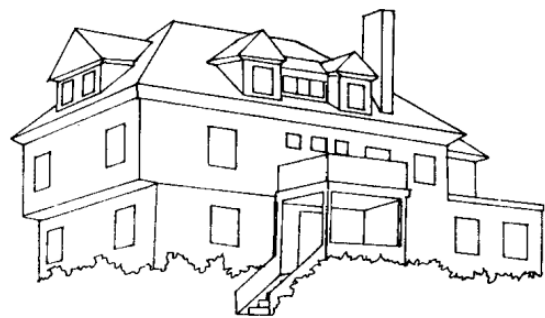
Article 8.000 of the Zoning Ordinance regulates how changes can be made to nonconforming existing buildings by-right or by special permit. One particular provision deals with dormers, or, more broadly, additions to an upper story of a building that do not extend beyond the walls of the story below.

Dormers can be added to nonconforming buildings even if they increase nonconformity under specified conditions. Per [Section 8.22.1\(h\)](#), new dormers may increase violations of yard and height requirements, but they cannot further exceed the FAR limits or other requirements of Article 5.000. To be considered by-right development, new dormers must not exceed dimensional limits so that 1) a dormer or addition to the second story does not extend horizontally beyond the vertical walls of the existing first story of the structure, and 2) a dormer on the third story must be 15 feet or less in length and shall not extend horizontally beyond the vertical walls of the existing second story nor above the existing ridge line. Additions that don't meet these standards may be approved by special permit under the provisions of Section 8.22.2, including the recently adopted 8.22.2(d) which allows the extension of non-conforming aspects of single-family and two-family homes (including FAR) by special permit. In other cases, a variance is usually needed to permit a change that increases the floor area of a building that already exceeds the maximum district FAR.

In addition to the zoning regulations, applicants are encouraged to construct dormers that align with the City's [Design Guidelines For Roof Dormers](#), published in 1996. The document states its intention is "to help property owners, and the design and building professionals working for them, create dormers that will increase the living space of an attic story while retaining the basic design integrity of the building's rooflines" (pg. 3). The guidelines are also meant to inform applications reviewed by the Board for dormer proposals that do not meet the conditions of Section 8.22.1(h).

The guidelines provide a greater level of detail than zoning regulations and provide guidance based on dormer type – shed, gable, or a combination of both. The guidelines articulate preferred setbacks from roof edges, placement on roof, amount and placement of windows, and wall material and color. Dormers should be placed on the center of the least-publicly-visible portion of the roof. They should be set back at least 3.5 feet from the side edges of the roof, 1.5 feet from the main wall of the building below the dormer, and one foot from the roof ridgeline, as well as have a length no greater than 15 feet or one-half of the horizontal length of the roof, whichever is less. Windows should account for no less than 50% of the dormer's front wall and the wall material and color should match the building's cladding.

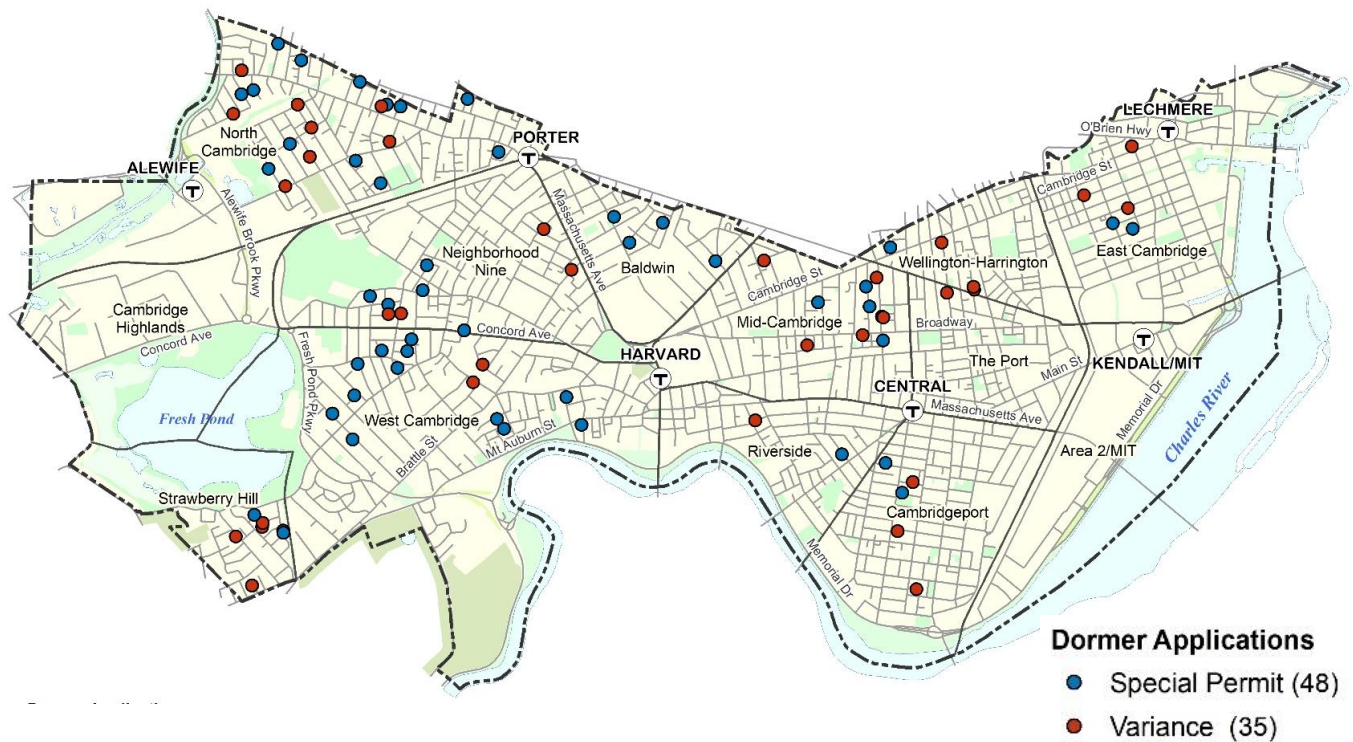
While it's less common for more than one shed dormer to be present on a roof, gable dormers may be constructed in pairs or triplets. When more than one gable dormer is proposed, they should be arranged symmetrically within the main roof so that they are centered and spaced proportionally. If both gable and shed dormers are constructed, the shed dormer should be located in the middle of the roof with gable dormers connected to its edges like bookends (see the illustration to the right).



Example of "bookend" dormers from the City's Design Guidelines For Roof Dormers

*Where Has the BZA Approved Dormers in Cambridge?*

The map below illustrates the locations of dormer applications reviewed by the BZA since 2020. Out of 83 total applications, 73 were approved, four were not approved, and three are still under consideration.



**Summary of Petition Changes & Comments on Proposed Zoning**

The Petition proposes to define a “dormer” in Article 2.000 as “A roofed projection built out from a sloping roof, containing a window or windows”.

It would also amend Section 8.22.1(h) to allow the construction of a dormer to further violate FAR limits from the existing nonconformity and removes the phrase that prohibits violating other requirements of Article 5.000. The Petition also proposes to modify the dimensional requirements of dormers so that 1) the sides of the dormer shall be located no closer than 3.5 feet to the sides of the building below, nor shall the dormer be greater than half the length of the main wall, 2) windows shall cover a minimum of 50% of the primary dormer wall, and 3) the top of the dormer shall not extend above the existing roof ridge. These modifications remove the 15-foot maximum

length for dormers and further restricts to location of dormer walls so that the dormer may be built to the existing wall on its front wall but must be setback from the existing walls on its side walls.

The Petition's stated intention is to simplify the approval process for dormers by incorporating dormer guidelines directly into the Zoning Ordinance. The implication is that a simplified process could encourage more dormers that help expand space for families in their existing homes and add to the housing stock by reducing time and cost of permit approvals, thus leading to fewer cases that require BZA review.

### *Considerations*

**Guidelines and Requirements:** Historically the City has used design guidelines to help guide the review of development proposals in a manner that helps to reinforce the unique planning and design characteristics of a place or project, such as the AHO Design Guidelines, Central Square/Kendall Square Design Guidelines, and Alewife Design Guidelines. Guidelines might create suggested design qualities, but they are separate and distinct from zoning requirements. Guidelines are flexible and advisory in nature and often cover a range of topics that zoning can't – such as materials, unique site characteristics, ecology, color, texture, etc. While guidelines can cater to the uniqueness of each site and project proposal, zoning standards are rigid and there is no room for creative interpretation in how they are met.

Guidelines are usually applied when a proposal needs to undergo a special permit or other discretionary review process prescribed by the Zoning Ordinance. When development proposals are subject to that kind of review, the Boards or Commissions review consistency with design guidelines 'on balance' – meaning not every guideline must be met but the Board should find that a proposal is consistent with the applicable guidelines as a whole. The dormer guidelines are a bit different because they are often applied to variances, which are judged primarily based on whether the normal zoning rules impose a hardship that is unique to that site and not typical throughout the zoning district. Because dormers are routinely sought and granted, the guidelines can be a helpful reference but are not explicitly part of the approval criteria. In this sense, it may be helpful to have specific standards in zoning so as not to rely on variances to approve typical modifications.

On the other hand, the dimensional requirements translated from the design guidelines could have a counterproductive effect of making the zoning ordinance too rigid and more difficult to meet. This means that if the dimensional requirements are too rigid, they could create potential for those same applications to still need zoning relief rather than being able to proceed as-of-right.

The proposed standards in the Petition are also not fully aligned with the dormer guidelines because not all of the dimensional standards in the guidelines are part of the Petition. Specifically, the original 15-foot length limitation for the main wall of the dormer (which is also

currently part of 8.22.1(h)) was removed so that the length limitation is just half of the length of the roof standard. This could result in dormers that are larger than what the guidelines recommend. More discussion might be needed to explain how certain standards were chosen over others.

**Clarity of Wording:** The Petition includes zoning language that may be confusing. This language includes the use of “and/or” among the allowable nonconforming features that creates uncertainty about the intent of what modifications are allowable. Another issue is that the Petition deletes current text that allowable dormers can violate “no other requirements of Article 5.000” from those specified, but does not insert text stating that other requirements of Article 5.000 could be violated, leaving it ambiguous whether the intent is to permit a violation of unspecified requirements in Article 5.000. It also uses terms that are undefined in the Zoning Ordinance, such as “Primary face” and “primary dormer wall”, that does not align with the terms used in the dormer guidelines. It is important that language in zoning be clear for it to be enforceable and predictable.

As with most zoning petitions, if the Planning Board votes to make a recommendation to Council, staff suggests that the Planning Board include a recommendation that CDD, ISD, and Law Department staff review the text for clarity and consistency.

**Further Changes:** Petitioners note that further adjustments to the Petition may be needed and that it is important to start the Council process to consider substantive amendments. Although amendments to the Petition can be made during the hearing process, staff would caution that once a zoning petition is advertised, any amendments that alter the fundamental character of the Petition would need to be refiled as a new Petition for additional hearings. These types of changes might include expanding the range of allowable relief for dormers beyond what is in the current Petition.

**Dormers and Housing:** One of the goals suggested in the Petition is that allowing dormers would help contribute to the city’s housing stock. Although dormers can certainly add to the livable space within housing units, which might make them more suitable and attractive for families, most often the addition of dormers does not lead to additional housing units. Moreover, the Petition does not appear to allow an as-of-right increase in housing unit density, which would be needed in most cases to create additional units in the process of adding dormers.

The City Council has been discussing major changes to the Zoning Ordinance with the goal of promoting multifamily housing citywide. If multifamily housing were allowed and restrictions on housing unit density were reduced or removed, then the proposed dormer provisions might be helpful in facilitating conversions of existing housing into a greater number of units. However, the changes being considered also include increasing or removing FAR limitations, which would make fewer existing buildings non-conforming and thus reduce the number of cases that would need to follow Article 8.000. Although this type of change would not necessarily create any conflict with the current Petition, it might make it less relevant because most dormers could be added as-of-right without needing to follow the proposed standards in Article 8.000.