



CITY OF CAMBRIDGE, MASSACHUSETTS

# PLANNING BOARD

CITY HALL ANNEX, 344 BROADWAY, CAMBRIDGE, MA 02139

2008 MAR 27 P 12:59  
OFFICE OF THE CITY CLERK  
CAMBRIDGE, MASSACHUSETTS

## NOTICE OF DECISION

Case Number:	229
Address:	424-430 Windsor Street
Zoning:	Residence C-1
Applicant:	Just-A-Start Corporation 432 Columbia Street #12 Cambridge, MA 02141
Owner:	Same as Applicant
Application Date:	August 3, 2007
Date of Planning Board Public Hearing:	August 21, 2007
Date of Planning Board Decision:	March 18, 2008
Date of Filing Planning Board Decision:	March 27, 2008

**Application:** Relief sought under Section 5.28 – Conversion of Non-Residential Structures to Residential Use for the conversion of existing church and rectory structures to multi-family residential use; and waiver of special permit application fee for development of affordable housing.

**Decision:** **GRANTED**, with conditions

Appeals, if any, shall be made pursuant to Section 17 of Massachusetts General Laws, Chapter 40A, and shall be filed within twenty (20) days after filing of the above referenced decision with the City Clerk. Copies of the complete decision and final plans, if applicable, are on file with the Community Development Department and the City Clerk.

Authorized Representative of the Planning Board: Elizabeth M. Paden

For further information concerning this decision, please contact Liza Paden at 617 349 4647, or [lpaden@cambridgema.gov](mailto:lpaden@cambridgema.gov).

## DOCUMENTS SUBMITTED

1. Special Permit Application dated August 3, 2007 submitted by Just A Start Corporation, including: Cover Sheet; Summary of Application; Narrative Description; Dimensional Form; Ownership Certificate; Drawings by Boyes-Watson Architects dated 07/23/07 titled A-000 Cover and Index Sheet, ALTA / ACSM Land Title Survey, A-001 Photographs, A-002 Zoning Compliance Sheet, A-100 Site Selective Removal, A-101 Proposed Site Plan, A-200 #424 - Selective Removal Floor Plans, A-201 #424 - Selective Removal Elevations, A-210 #430 - Selective Removal Floor Plans and Elevations, A-300 #424 - Proposed Floor Plans, A-400 #424 - Proposed Elevations, A-404 #424 - Alternative Proposal With Dormers, A-410 #430 - Proposed Floor Plans and Elevations.
2. E-mail message dated August 15, 2007 from City Councillor Craig Kelley to Beatriz Gomez, copied to Liza Paden.
3. Document titled "Neighborhood Preservation Petition" dated August 16, 2007 signed by "a concerned group of Wellington-Harrington neighbors" including: copies of Cambridge Chronicle clippings; essay titled "Open Space at Risk", data from University of Virginia Library web site; map titled "Census 2000: Cambridge, Massachusetts Population Density & Racial Mix"; list of signatures "Opposing Windsor Street Church 16 Units".
4. Document titled "Petition to the Cambridge Historical Commission to study for Landmark Designation the former Immaculate Conception Lithuanian church building" dated August 16, 2007.
5. Letter to the Planning Board dated August 20, 2007 from Christopher Cotter, Housing Director, on behalf of the Cambridge Affordable Housing Trust.
6. Revised Dimensional Form dated 08/21/07 submitted by the Applicant.
7. Submittal to the Planning Board dated August 21, 2007 from Just A Start Corporation titled "Windsor Church Public Notice" including: a summary narrative of notifications sent to neighbors, list of names and addresses to which notices were sent, map showing area to which notices were sent, copy of letter sent from Just A Start Corporation to neighbors dated 07/26/07, copy of letter sent from Just A Start Corporation to neighbors dated 08/07/07, copy of letter sent from Just A Start Corporation to neighbors dated 08/16/07, copy of sign-in sheet from meeting held 08/14/07.
8. Paper handout titled "How many units are allowed on the site?" distributed by Applicant on August 21, 2007 (not dated).
9. Photographs of site vicinity submitted to the Planning Board by Rudy Belliardi on August 21, 2007 (not dated).
10. E-mail message dated August 22, 2007 from Marion Figueiredo to Liza Paden.

11. E-mail message dated August 22, 2007 from Rudy Belliardi to Marion Figueiredo, copied to Liza Paden.
12. E-mail message dated August 24, 2007 from Beatriz Gomez to Marion Figueiredo, copied to Liza Paden.
13. Letter to the Planning Board dated November 5, 2007, from Beatriz Gómez Mouakad, Project Manager for Just A Start Corporation, requesting an extension of the period for deliberation and determination until February 29, 2008. [Request granted by the Planning Board on November 13, 2007.]
14. Legal Notice of Public Hearing held by the Cambridge Historical Commission on Thursday, January 3, 2008 to consider matters including proposed alterations to exterior of 424-430 Windsor St.
15. Transmittal to the Planning Board dated February 6, 2008 from Charles Sullivan, Executive Director, Cambridge Historical Commission and Sarah L. Burks, Preservation Planner, Cambridge Historical Commission including: summary of ongoing Historical Commission review processes for the proposed project; Certificate of Appropriateness for the proposed project (CHC Case 2094) dated 01/16/08, with conditions; Disapproval of Application for a Certificate of Appropriateness for the installation of up to fourteen air conditioning units on the project site (CHC Case 2094) dated 01/03/08.
16. Revised Application material dated February 11, 2008 submitted by Just A Start Corporation, including: Revised Dimensional Form dated 02/11/08; analysis of on-street parking prepared by Vanasse & Associates, Inc.; Letter describing stormwater site design by Lenard Engineering, Inc.; Drawings by Boyes-Watson Architects dated 02/12/08 titled A-000 Cover and Index Sheet, ALTA / ACSM Land Title Survey, A-001 Photographs; A-002 Zoning Compliance Sheet, A-002-A Open Space Calculations and Parking Layout, A-003 Aerial / Property Maps, A-100 Site Selective Removal, A-101 Proposed Site Plan, A-200 #424 - Selective Floor Removal Plans, A-201 #424 - Selective Removal Elevations, A-210 #430 - Selective Removal Floor Plans and Elevations, A-300 #424 - Proposed Floor Plans, A-400 #424 - Existing/Proposed Elevations, A-401 #424 - Existing/Proposed Elevations, A-410 #430 - Proposed Floor Plans and Elevations / Existing Elevations, A-500 #424 - Schematic Building Sections; Open Space and Neighborhood Context Map dated 02/11/08.
17. Transmittal dated February 15, 2008 from D. Margaret Drury, City Clerk, to Beth Rubenstein, Assistant City Manager for Community Development, forwarding City Council Order O-5 dated February 11, 2008.
18. Letter to the Planning Board dated February 19, 2008, from Beatriz Gómez Mouakad, Project Manager for Just A Start Corporation, requesting an extension of the period for deliberation and determination until March 28, 2008. [Request granted by the Planning Board on February 19, 2008.]

19. Revised Application material dated March 10, 2008 submitted by Just A Start Corporation, including: Revised Dimensional Form dated 02/25/08; Revised Drawings by Boyes-Watson Architects dated 02/25/08 titled A-101 Proposed Site Plan, A-002 Zoning Compliance Sheet, A-002-A Open Space Calculations and Parking Layout.
20. Letter to the Planning Board from City Councillor Timothy J. Toomey dated March 18, 2008.
21. Maps of Housing Unit Density and Existing FAR for parcels in the vicinity of 424-430 Windsor Street, prepared by the Community Development Department, dated February 11, 2008, submitted to the Planning Board on March 18, 2008.
22. Booklet titled "Cambridge Affordable Housing Trust" submitted to the Planning Board on March 18, 2008.
23. Photographs of site vicinity and other areas submitted to the Planning Board by Rudy Belliardi on March 18, 2008 (not dated).
24. Document titled "Applicant's Submission in Support of Granting the Special Permit", submitted to the Planning Board on March 18, 2008 by the Applicant (not dated).
25. Revised Ownership Certificate submitted to the Planning Board on March 25, 2008.
26. Letter to the Planning Board dated March 26, 2008 from Sue Clippinger, Director of Traffic, Parking and Transportation.

## **FINDINGS**

1. Conformance with Provisions of Section 5.28.2, Conversion of Non Residential Structures to Residential Use

The Planning Board finds that the proposed project satisfies the requirements for conversion of a non-residential structure to residential use as specified in Section 5.28.2 of the Zoning Ordinance, based on the findings below:

*5.28.21 Gross Floor Area.*

The existing buildings contain 19,985 square feet of Gross Floor Area. The proposed development will result in a total of 24,710 square feet of Gross Floor Area. All proposed new Gross Floor Area in excess of existing Gross Floor Area will be contained within the physical limits of the existing structures; therefore, the additional Gross Floor Area is allowed under Section 5.28.21.

#### *5.28.22 Dwelling Units*

A maximum of one dwelling unit is allowed for every 900 square feet of Gross Floor Area permitted under Section 5.28.21. Since the proposed project will include 24,710 square feet of Gross Floor Area within the existing limits of the buildings, a maximum of 27 units is allowed under Section 5.28.22. The proposal is for 14 units.

#### *5.28.23 Yard Requirements*

The proposed front, side and rear yard setbacks will remain the same as for the existing structures, as allowed under Section 5.28.23.

#### *5.28.24 Maximum Height*

Since no new development will occur above the roofs of the existing structures, the height of the proposed structures will be the same as the height of the existing structure as allowed under Section 5.28.24.

#### *5.28.25 Private Open Space Requirements*

The proposed project includes 4,707 square feet of open space, which is equivalent to 30% of the total lot area. All open space is permeable and an amount of open space equivalent to 10% of the lot area can be classified as Private (Usable) Open Space as defined in Section 5.22. The required minimum amount of open space in the Residence C-1 district is 30% of the total lot area. Under Section 5.28.25, the dimensional and location limitations on open space specified in Section 5.22 do not apply, and the proposed project is not required to ensure that half of its required open space meet the definition of "Private" (Usable) as described in Section 5.22. Therefore the proposed development satisfies the requirements for open space as specified in Section 5.28.25.

#### *5.28.26 Conforming Additions*

No additions to the existing structures are proposed.

*5.28.27 Criteria for Approval of a Special Permit. The Planning Board shall consider the following:*

- (a) The impact on residential neighbors of the new housing use as it may affect privacy. The location and size of windows, screening elements, decks, entries, and other aspects of the design shall be reviewed to maintain reasonable levels of privacy for abutters where significant variations from the normally required dimensional standards for the district are granted. In reviewing a proposed development plan, the Board shall consider, among other factors, the potential negative impacts of the new activity on abutters and the location, orientation, and use of structures and yards on adjacent properties.*

The proposed development will utilize existing window openings to provide most of the necessary residential unit windows. As shown on the elevation drawings, only a few new window openings will be created on the rear elevations of the existing church and rectory buildings, and some existing openings will be enlarged to provide suitable residential windows.

At the side yard of the existing church building, where it abuts a residential property to the southwest, the setback distance to the property line of the abutting residential parcel is approximately eleven feet for most of the length of the building and approximately five feet for a section toward the rear of the lot. The minimum side setback distance between the existing church building and the property line is comparable to the setback between the abutting residential building and the same property line. An existing six-foot fence along the length of the property line, on the abutter's side, is expected to remain.

At the northeast side yard of the existing rectory building, the setback distance from the property line of the abutting residential parcel is approximately five feet. This distance is comparable to the side setback distance from the abutting residential building to the same property line. The project proposes to close many of the window openings on the right side of the rectory building in order to improve privacy for the abutting residential building. The proposed project will also include construction of a new six-foot wooden fence along the northeastern property line and the preservation of an existing brick fence.

The Board finds that the Applicant has demonstrated a reasonable effort to minimize the potential impacts on privacy to abutters where possible, given the existing conditions of the site and the need to provide appropriate window openings to ensure the livability of the residential units. Property fences will be maintained, in some cases through the retention of existing fences, in other cases through the replacement of existing chain-link fences with new wood fences, consistent with the character of the existing neighborhood. Yard areas near the edges of the property will be appropriately landscaped with plant material.

- (b) *The impact of increased numbers of dwelling units above that normally permitted in the district, on on-street parking, particularly in neighborhoods where off-street parking is limited. In reaching a determination, the Board may require an analysis of on-street parking utilization on streets in the vicinity of the proposed development to consider available capacity relative to the demand generated by the proposed development. The scope and methodology of such an analysis shall be determined in consultation with City staff. Following its consideration of the results of the analysis, the Board may require changes to the project.*

The proposed project will result in 14 new dwelling units, all of which will be priced and marketed as affordable to low- and moderate-income households. Under the base zoning regulations, a parcel the size of the development site would allow the construction of 10 new dwelling units. Under the inclusionary zoning provision in Section 11.200 of the Zoning Ordinance, an additional four units would be allowed above the number allowed by base zoning, and at least two of those units would be required to be priced affordably

and reserved for low- and moderate-income households. The Board finds that the number of units in the proposed project does not represent an increase in the number of units normally permitted in the district. In addition, based on analysis performed by the Community Development Department, the Board finds that the dwelling unit density for the proposed project is not significantly higher than the typical dwelling unit density of existing residential parcels in the neighborhood.

Moreover, the proposed project will provide off-street parking at a ratio of one space per dwelling unit, as is typically required by zoning for residential projects. Under the provisions of Section 6.12(d) of the Zoning Ordinance, since the proposed project involves the change of an existing structure to an Affordable Housing Project of entirely Affordable Units, the required amount of off-street parking is reduced to 60% of the normal zoning requirement. This results in a minimum requirement of 9 parking spaces, which is exceeded by the proposed provision of 14 parking spaces. Therefore the Board finds that the proposed project will not result in a significant increase in demand for on-street parking. Additionally, based on an on-street parking utilization survey provided by the Applicant, the Board finds that while on-street parking is reasonably well utilized in the neighborhood, there is sufficient excess capacity to provide opportunities for occasional parking, such as parking for visitors, if there is demand for such parking that cannot be satisfied by the off-street parking spaces provided.

## 2. Conformance with Section 10.43, General Special Permit Criteria

*Special permits will normally be granted where specific provisions of this Ordinance are met, except when particulars of the location or use, not generally true of the district or of the uses permitted in it, would cause granting of such permit to be to the detriment of the public interest.*

The Board finds that the proposed project meets the provisions of the Zoning Ordinance, and that the specifics of its location and use are consistent with the character of the district and the uses permitted within it, and that the proposed project will not be to the detriment of the public interest, based on the findings below:

*(1) The requirements of the Zoning Ordinance can be met.*

The proposed project meets the requirements of the Zoning Ordinance through the provisions of Section 5.28.2 – Conversion of Non Residential Structures to Residential Use – as described above.

*(2) Traffic and patterns of access and egress will not cause hazard or congestion or change in neighborhood character.*

The proposed residential project will not result in substantial adverse traffic impacts beyond the traffic generated by comparable existing residential development in the neighborhood. The access and egress for the proposed project is accomplished by way of

several pedestrian-oriented entrances at the front of the parcel as well as an existing vehicular driveway that connects a curb cut at the front of the parcel to parking areas at the rear of the parcel and within the physical limits of the existing church structure. The Board finds that this arrangement is consistent with the existing neighborhood character, and moreover that this arrangement demonstrates a preference for pedestrian access over vehicular access that is consistent with the City's policy of discouraging automobile travel when walking is possible.

- (3) *The operation or development of adjacent uses will not be adversely affected.*

The proposed residential project will not adversely affect the operation or development of adjacent residential uses.

- (4) *No nuisance or hazard will be created to the detriment of the health, safety and welfare of future residents or citizens of Cambridge.*

The proposed project will comply with the applicable health, safety and building code requirements. No hazard or nuisance will be created.

- (5) *The use will not impair the integrity of the District or adjoining districts or otherwise derogate from the intent and purpose of this Ordinance.*

The proposed residential use is appropriate within the existing residential neighborhood and is fully consistent with the intent of the Zoning Ordinance. The proposed conversion of a non-residential structure to a residential use is consistent with the intent and purpose of Section 5.28.2, Conversion of Non-Residential Structures to Residential Use.

- (6) *The new use or building construction is consistent with the Urban Design Objectives set forth in Section 19.30.*

The proposed new use is consistent with those objectives, as described below:

*New projects should be responsive to the existing or anticipated pattern of development.*

The proposed project will convert existing non-residential structures to residential use in a predominantly residential neighborhood that is residentially-zoned. Therefore it is fully consistent with both existing and anticipated patterns of development.

*Development should be pedestrian and bicycle-friendly, with a positive relationship to its surroundings.*

The proposed project will result in a pedestrian-oriented arrangement of access and egress points and green landscaping at the front and sides of the development site, which will allow for comfortable and attractive pedestrian access. The proposed development will also include 7 bicycle parking spaces as per the requirements of the base zoning district, which will be accessed by way of the vehicular access/egress point.



*The building and site design should mitigate adverse environmental impacts of a development upon its neighbors.*

Side and rear setbacks will be landscaped, and new wood fences will be constructed along property lines where chain-link fences currently exist. The small surface parking area provided at the rear of the lot will be screened from abutting properties with new plantings and fencing. Any exterior mechanical equipment will be selected, organized, and screened where appropriate to minimize noise impacts on neighboring residents.

*Projects should not overburden the City infrastructure services, including neighborhood roads, city water supply system, and sewer system.*

The proposed change of use from a church and rectory to residential buildings is not expected to have a significant adverse impact on City infrastructure services. The residential density of the proposed project is comparable to that of existing residential uses in the neighborhood; therefore, the intensity of use will not be an extraordinary burden on existing infrastructure.

*New construction should reinforce and enhance the complex urban aspects of Cambridge as it has developed historically.*

The proposed project will involve the conversion of an existing historic structure and will not include the construction of new structures, so it is fully consistent with the historical character of the neighborhood.

*Expansion of the inventory of housing in the city is encouraged.*

The proposed project will add 14 new owner-occupied residential units, all of which will be priced affordably and marketed to low- and moderate-income households.

*Enhancement and expansion of open space amenities in the city should be incorporated into new development in the city.*

The proposed project will increase the amount of open space on the development site by removing existing paved surface parking, and will include new plantings and green landscaping at the buildings' front, side and rear yards. This improvement to the open space on the development site will be directly beneficial to the future residents of the proposed project and visually beneficial to neighbors and passers-by.

3. Conformance with Section 10.47, Criteria for Approval of Townhouses and Multifamily Special Permits

*In reviewing applications for townhouse developments and multifamily dwellings, the special permit granting authority shall consider and address the following site plan criteria as applicable:*

- (1) *Key features of the natural landscape should be preserved to the maximum extent feasible. Tree removal should be minimized and other natural features of the site, such as slopes, should be maintained.*

The existing landscaped front and side yards will be retained on the site and a new landscaped yard area will be created at the interior of the site, increasing the percentage of usable open space on the lot from 19% to 30%. The one significant tree on the site will be retained and new greenery will be planted.

- (2) *New buildings should be related sensitively to the existing built environment. The location, orientation and massing of structures in the development should avoid overwhelming the existing buildings in the vicinity of the development. Visual and functional disruptions should be avoided.*

The proposed development uses existing structures; no new buildings are proposed.

- (3) *The location, arrangement, and landscaping of open space should provide some visual benefits to abutters and passersby as well as functional benefits to occupants of the development.*

The side yard setbacks will be visually accessible to some abutters and the front yard setbacks will be visually accessible to all passersby. The new landscaped area will be usable by residents of the proposed development and could be visually enjoyed by abutters from upper-story windows.

- (4) *Parking areas, internal roadways and access/egress points should be safe and convenient.*

The accessory parking for the proposed project includes twelve parking spaces enclosed within the existing church building, accessed by way of a sloped driveway through the side of the building, and two on-grade parking spaces, one of which will be accessible to handicapped persons. All parking is accessible from the existing driveway leading to an egress at the front of the lot. This parking arrangement is sensible and preferred over arrangements that would place more parking on-grade or place parking ramps at the front of the lot.

- (5) *Parking area landscaping should minimize the intrusion of onsite parking so that it does not substantially detract from the use and enjoyment of either the proposed development or neighboring properties.*

The majority of parking in the proposed development is located within the physical limits of the existing church building, providing the opportunity for ample landscaping on-grade with only two on-grade parking spaces provided at the rear of the lot.

(6) *Service facilities such as trash collection apparatus and utility boxes should be located so that they are convenient for residents, yet unobtrusive.*

Trash storage areas will be located within the physical limits of the existing church structure. Utility boxes will be located inside the buildings wherever possible, and any outdoor equipment will be screened so as to be unobtrusive to abutters or passers-by.

## DECISION

Based on a review of the application documents, comments made at the public hearing, and the above findings, the Planning Board **GRANTS** the requested Special Permit subject to the following conditions and limitations:

1. All use, building construction and site plan development shall be in substantial conformance with the plans and application documents submitted to the Planning Board as referenced above, with the most recent version dated 02/12/08 and including modifications presented to the Planning Board on March 18, 2008. Appendix I summarizes the dimensional features of the Project as approved.
2. The project shall be subject to continuing design review by the Community Development Department (CDD). Before issuance of each Building Permit for the project, CDD shall certify to the Superintendent of Buildings that the final plans submitted to secure the Building Permit are consistent with and meet all conditions of this Permit.

In undertaking its review, CDD shall determine that any exterior heating and cooling mechanical equipment is designed and located so as to minimize acoustic and visual impact on residents of neighboring properties.

3. If exterior on-grade air conditioning condensers are provided, which would require a Certificate of Appropriateness from the Cambridge Historical Commission for their design, placement, and screening, then no such exterior on-grade air conditioning condensers shall be installed prior to the granting of said Certificate of Appropriateness.
4. All authorized development shall conform to the requirements of the City of Cambridge *Noise Control Ordinance*, Chapter 8.16 of the City Municipal Code.

The Planning Board also waives the Special Permit fee for the not-for-profit applicant Just A Start Corporation for this affordable housing proposal.

Voting in the Affirmative to GRANT the Special Permit were Planning Board Members T. Cohen, H. Russell, P. Singer, W. Tibbs, S. Winter, and P. Winters, constituting at least two thirds of the members of the Planning Board necessary to grant a Special Permit.

For the Planning Board,

*William Tibbs (EMP)*

William Tibbs, Chair

A copy of this decision #229 shall be filed with the Office of the City Clerk. Appeals, if any, shall be made pursuant to Section 17, Chapter 40A, Massachusetts General Laws, and shall be filed within twenty (20) days after the date of such filing in the Office of the City Clerk.

ATTEST: A true and correct copy of the above decision filed with the Office of the City Clerk

on March 27, 2008 (date),

by Elizabeth M. Peck (Signature, CDD staff person) authorized representative of the Cambridge Planning Board. All plans referred to in the decision have been filed with the City Clerk on said date.

Twenty (20) days have elapsed since the filing of the decision. No appeal has been filed.

DATE:

City Clerk of Cambridge

## Appendix I: Dimensional Chart

	Existing	Allowed or Required	Proposed	Permitted
Lot Area (sq ft)	15,704	5,000 minimum	15,704	No change
Total GFA (sq ft)	19,985	Limited by 5.28.21*	24,710 *	Consistent with application plans and documents
Residential	-	Limited by 5.28.21*	24,710 *	
Non-Residential	19,985	-	-	
Total FAR	1.27	Limited by 5.28.21*	1.57	Consistent with application plans and documents
Residential	-	Limited by 5.28.21*	1.57	
Non-Residential	1.27	-	-	
Lot Area / Dwelling Unit (sq ft)	Not app.	Limited by 5.28.22*	1,122	1,122
Total Dwelling Units	-	27 (by 5.28.22)*	14	14
Inclusionary Units	-	Consistent w/11.200	-	Consistent w/11.200
Lot Width (ft)	119.8	50 minimum	119.8	No change
Height (ft)	52 (church) 31 (rectory)	52 (by 5.28.24) 31 (by 5.28.24)	No change	No change
Front Setback (ft)	2.0 (church) 9.9 (rectory)	2.0, 9.9 (by 5.28.23)	No change	Yard setbacks are permitted to remain as existing consistent with application plans and documents
Side Setback – SW (ft)	5.4	5.4 (by 5.28.23)	No change	
Side Setback – NE (ft)	5.5	5.5 (by 5.28.23)	No change	
Rear Setback (ft)	1.4-5.3 (church) 81.8 (rectory)	1.4-5.3, 81.8 (by 5.28.23)	No change	
Setback Between Buildings (ft)	14.3	13.8	No change	
Open Space Area (% of lot)	19 %	30 %	30 %	Consistent with application plans and documents
Useable	0 %	Not app. by 5.28.25	10 %	
Other	19 %	Not app. by 5.28.25	20 %	
Off-Street Parking Spaces	10	9 minimum	14	14
Handicapped	-	1 minimum	1	1
Bicycle Spaces	-	7 minimum	7	7
Loading Bays	-	Not app.	Not app.	Not app.

\* 5.28.21 allows an unlimited amount of Gross Floor Area but only within the extents of the existing building. 5.28.22 allows a number of dwelling units equal to the amount of Gross Floor Area permitted under 5.28.21 divided by 900 square feet.