

# Memorandum



**DATE** February 12, 2016

**TO** Honorable Members of the Housing Committee: Scott Griggs (Chair), Carolyn King Arnold (Vice-Chair), Monica R. Alonzo, Tiffinni A. Young, Mark Clayton, Casey Thomas, II.

**SUBJECT** Accessory Dwelling Units

On February 16, 2016 you will have a second briefing on accessory dwelling units. This item was previously briefed on October 19, 2015. During the briefing the Committee asked several questions, the responses to those questions and a copy of the briefing are attached for your review. The purpose of this briefing is to receive direction from the committee as to possible code amendments.



Ryan S. Evans  
First Assistant City Manager

## Attachment

c: Honorable Mayor and Members of the City Council  
A.C. Gonzalez, City Manager  
Warren M.S. Ernst, City Attorney  
Craig D. Kinton, City Auditor  
Rosa A. Rios, City Secretary  
Daniel F. Solis, Administrative Judge  
Eric D. Campbell, Assistant City Manager  
Jill A. Jordan, P.E., Assistant City Manager  
Mark McDaniel, Assistant City Manager  
Joey Zapata, Assistant City Manager  
Jeanne Chipperfield, Chief Financial Officer  
Sana Syed, Managing Director, Public Information Office  
Elsa Cantu, Assistant to the City Manager – Mayor & Council

During the briefing on Accessory Dwelling Units on October 19, 2015, the Committee asked several questions and the responses are below:

- How would accessory dwelling units affect the Neighborhood Plus plans?

Neighborhood Plus recommends implementing programs to reduce housing affordability gaps and increase housing choices for renters. If directed to pursue option to regulate ADUs, Staff will work with the various communities to see if ADUs would be desirable.

- How are utility connections handled in other cities? If the property owner is required to live on the premises, what happens if the owner dies?

San Antonio and El Paso do not allow additional utility connections but must be connected to the primary dwelling unit. The City of Austin allows the property owner to choose either to connect the utilities to the primary dwelling unit or keep them separate.

Utilities, parking, unit size, owner occupancy, quality of structure, and other issues would be researched and addressed as Staff worked on regulations, depending on which option the Committee decides to pursue.

- How are ADUs working in other cities? How long have other cities allowed ADUs? What challenges did they face in implementing the regulations?

Staff from San Antonio, El Paso, and Austin indicated that ADUs are working well in their communities.

San Antonio has allowed ADUs since 2001 and the staff expressed that the architecture of the ADUs and additional off-street parking are their concerns.

El Paso has allowed ADUs since the 1930's (officially adopted in 2011) and they have no concerns with detached ADUs.

Austin has allowed ADUs since 1997 and the staff there indicated that they recently amended the ADU ordinance to address parking requirements and minimum size for the ADU.

- How are boarding houses and handicap group dwelling units (HGDU) currently regulated?

Boarding houses/lodging, residential hotels, group residential facilities are not allowed in single family residential districts and require a Certificate of Occupancy (CO) and registration. Handicap group dwelling units are allowed in a single family residential district and may require a Specific Use Permit if with 1,000 feet of another HGDU.

- How would ADU regulations be enforced?

If allowed, ADUs are like any other zoning regulations and would be monitored by the Department of Code Compliance. Staff from Code Compliance will be involved through the amendment process to vet the proposed regulations.

# Accessory Dwelling Units

## Housing Committee

February 16, 2016



# Purpose of Briefing

- Brief the Committee on input received from the December 15, 2015 meeting on accessory dwelling units in single family districts
- Receive direction from the Committee on possible code amendments

# Background

- October 19, 2015 - Staff briefed the **Housing Committee** on accessory dwelling units. During the briefing the committee directed staff to hold a meeting to receive public comments
- December 15, 2015 - Staff held a meeting on both **Accessory Dwelling Units** and **Non-Required Fences** to receive initial thoughts and concerns from residents regarding these topics.
- Invitations to the meeting were e-mailed to:
  - Strategic Customer Service e-mail list (329 neighborhood homeowner associations)
  - Early Notification list (over 500 neighborhood groups and individuals)
  - Zoning Ordinance Committee notification list (42)
  - Dallas Homeowners League Representatives
  - Dallas Builders Association Representatives
  - City Council offices

# Public Meeting Input

- Twenty-four people attended and provided written and verbal comments
- Comments against ADUs in single family districts:
  - Code enforcement is already overwhelmed and has difficulty enforcing ADUs being rented now
  - ADUs create additional burden on existing infrastructure (water, sewer, sanitation, schools, road capacity, etc.)
  - Excess on-street parking will reduce access for emergency vehicles and increase congestion
  - Some neighborhoods have worked hard to remove multifamily properties. Allowing ADUs in single family neighborhoods will un-do this work
  - ADUs will decrease property values
  - Too many illegal garage/shed conversions already
  - Construction quality for ADUs may be poor

# Public Meeting Input

- Comments supporting ADUs in single family districts:
  - ADUs can help slow down gentrification, increase density, and optimize existing infrastructure utilization
  - ADUs can provide additional income to seniors and help them to remain in their homes (age in place)
  - ADUs should be allowed with restrictions, such as number of people allowed in ADU, parking, lot size, etc.

# Questions from Committee

- How would accessory dwelling units affect the Neighborhood Plus plans?
  - Neighborhood Plus recommends implementing programs to reduce housing affordability gaps and increase housing choices for renters. If directed to pursue option to regulate ADUs, staff will work with the various communities to see if ADUs would be desirable.
- How are utility connections handled in other cities? If the property owner is required to live on the premises, what happens if the owner dies?
  - San Antonio and El Paso do not allow additional utility connections but must be connected to the primary dwelling units. The City of Austin allows the property owner to choose either to connect the utilities to the primary dwelling unit or keep them separate.
  - Utilities, parking, unit size, owner occupancy, quality of structure, and other issues would be researched and addressed as staff worked on regulations, depending on which option the committee decides to pursue.



# Questions from Committee

- How are ADUs working in other cities? How long have other cities had ADUs? What challenges did they face in implementing the regulations?
  - Staff from San Antonio, El Paso, and Austin indicated that ADUs are working well in their communities.
  - San Antonio has allowed ADUs since 2001 and staff expressed that the architecture of the ADUs and additional off-street parking are their concerns.
  - El Paso has allowed ADUs since the 1930's (officially adopted in 2011) and they have no concerns with detached ADUs.
  - Austin has allowed ADUs since 1997 and the staff there indicated that they recently amended the ADU ordinance to address parking requirements and limited size for the ADU.

# Questions from Committee

- How are boarding houses and handicap group dwelling units (HGDU) currently regulated?
  - Boarding houses/lodging, residential hotels, and group residential facilities are not allowed in the single family residential districts. They require Certificate of Occupancy (CO) and registration. Handicap group dwelling unit is allowed in a single family residential district and may require a Specific Use Permit if with 1,000 feet of another HGDU.
- How would ADU regulations be enforced?
  - If allowed, ADUs are like any other zoning regulations and would be monitored by the Department of Code Compliance. Staff from Code Compliance will be involved through the amendment process to vet the proposed regulations.

# Current Code

Currently, a request for an additional dwelling unit can be made to the Board of Adjustment (BDA). They can grant a special exception to allow an additional dwelling unit. The additional dwelling unit may not be rented.



Additional dwelling units allowed by BDA

# Issues to Address

- Owner occupancy on the premises (primary dwelling unit or ADUs)
- Parking
- Unit size
- Attached or detached
- Number of ADUs allowed on a lot
- Utilities
- Design guidelines

# Options

1. Allow Board of Adjustment (BDA) special exception to authorize an additional dwelling unit as a rental accommodation.
2. Create regulations to allow by an overlay district
3. Allow by right in all single family residential districts
4. No change to code

# Next Steps

- Receive direction from committee on accessory dwelling units in single family districts
- If directed to proceed, add to Zoning Ordinance Committee (ZOC) work program

# Appendix

# Accessory Dwelling Units

- Current code does not allow or define an accessory dwelling unit (ADU). However, an ADU is commonly considered as:
  - An **additional dwelling unit** on a **single family lot** that is **independent of the primary dwelling** unit, is usually subordinate to the main dwelling unit, and **for rent**.



# Current Code

## Residential Districts:

### Single Family Districts

- One dwelling unit per lot

### Duplex Districts

- Two attached dwelling units per lot

### Multifamily Districts

- Three or more dwelling units per lot

**Family** means individuals living together as a single housekeeping unit in which not more than four individuals are unrelated to the head of the household by blood, marriage, or adoption.

**Dwelling Unit** means one or more rooms designed to be a single housekeeping unit to accommodate one family and containing one or more kitchens, one or more bathrooms, and one or more bedrooms.



# Current Code

## Approved by Board of Adjustment

### **Additional dwelling units are governed by the Accessory Structure Regulations - 51A-4.209(b)(6)(E)(vii):**

- Cannot exceed height of the main building
- Floor area of each accessory structure (excluding parking area) shall not exceed 25% of the main building
- Floor area of **all** accessory structures (excluding parking area) shall not exceed 50% of the main building's floor area, and
- Shall be compatible in exterior siding, roofing, roof pitch, foundation fascia and fenestration of the main building. ("Compatible" means similar in color, material, pattern, quality, etc.)

\* Revised on 5/11/2005 by Ordinance No: 25977

# Code Compliance

## Non-owner occupied Rental Program

- Non-Owner Occupied Rental Program (NORP) was approved by the Dallas City Council on December 9, 2009 and became effective as of February 1, 2010
- NORP is for single family or multi-tenant homes that are either leased or rented and occupied by someone other than the owner of the property
- Owners of occupied rental property to register annually and pay a \$17 fee per rental property
- Renewal fee for a certificate of registration for a property is \$0 if the property was free of any confirmed structural code violations during the previous registration period
- Additional information can be found at:  
<http://dallascityhall.com/departments/codecompliance/Pages/NonownerOccupied.aspx>

# Index Cities

	Austin	Baltimore	Boston	Columbus	El Paso	Fort Worth	Philadelphia	Phoenix	San Antonio	San Jose	San Diego	*Vancouver, Canada
Additional Dwelling Unit allowed in Single Family District	Y	N	N	Y	Y	Y	Y	Y	Y	Y	Y	Y
Rental Allowed:	Y	N	N	N	Y	N	Y	N	Y	Y	Y	Y
Owner Occupancy on same lot	N	N/A	N/A	N/A	Y	N/A	Y	N/A	Y	Y	Y	N
ADU size regulations	Y	N/A	N/A	N/A	Y	N/A	Y	N/A	Y	Y	Y	Y
Lot size, set back requirements	Y	N/A	N/A	N/A	Y	N/A	Y	N/A	Y	Y	Y	Y
Additional or separate utility and sewer connections allowed	Y**	N/A	N/A	N/A	U	N/A	N	N/A	N	U	U	Y
Parking requirements	Y	N/A	N/A	N/A	Y	N/A	N	N/A	Y	Y	Y	Y
Design requirements	U	N/A	N/A	N/A	Y	N/A	U	N/A	Y	Y	Y	Y
Y - Yes												
N- No												
U - Unknown												
** City of Austin allows property owner to choose either to connect the utilities to the primary dwelling unit or keep them separate.												
N/A - Not Applicable												
* Not an Index Cities												

# Surrounding Cities

	Allen	Arlington	Cedar Hill	Duncanville	Fort Worth	Gaillard	Grand Prairie	Irving	Mesquite	McKinney	Plano	Richardson
Additional Dwelling Unit allowed in Single Family District	N	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
Rental Allowed:	N	N	N	N	N	N	N	N	N	N	N	N
Owner Occupancy on same lot	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
ADU size regulations	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Lot size, set back requirements	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Additional or separate utility and sewer connections allowed	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Parking requirements	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Design requirements	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Y - Yes												
N- No												
N/A - Not Applicable												

# Austin, TX

<b>Permit requirement</b>	Yes
<b>Attached and Detached</b>	Attached and Detached ADUs
<b>Owner occupancy</b>	not required
<b>Number of occupants</b>	unknown
<b>Lot size</b>	Attached ADU min. lot area 3,000 sq. ft; Detached ADU min. lot area 7,000 sq. ft
<b>ADU Size</b>	Detached ADU: 30 feet, maximum two stories
<b>ADU Height</b>	Compliance with the required setbacks of the primary structure required by the underlying zoning district.
<b>Setback requirements</b>	at least 15 feet to the rear of the PDU
<b>Utility and sewer connections</b>	Property owner can choose either to connect the utilities to the primary dwelling unit or keep them separate
<b>Parking</b>	Dwelling unit less than 6 bedroom, min. of one parking, Dwelling unit with more than 6 bedrooms, one parking per each bedroom.
<b>Design</b>	Unknown
<b>Additional requirements</b>	Recently City Council amended ADU regulations to: increase the maximum gfa of the ADU, location of the ADU, parking requirements, etc.,
<b>ADU</b> – Accessory Dwelling Unit; <b>PDU</b> - Primary Dwelling Unit; <b>ROW</b> - Right-of-Way; <b>Sq.ft</b> – Square feet; <b>ft</b> – feet; <b>gfa</b> – gross floor area	

# El Paso

<b>Attached and Detached</b>	Attached and Detached
<b>Owner occupancy</b>	Property owner must occupy either the PDU or ADU. One year of temporary absence period is allowed.
<b>Number of occupants</b>	unknown
<b>Lot Size</b>	minimum lot area is 5,500 sq.ft
<b>ADU Size</b>	lot area between 5,500 sf to 8,000 sq. ft - max ADU 800 sq.ft of gfa lot area above 8,000 sq ft - max ADU 1,200 sq.ft of gfa Only one bedroom per ADU. Only one ADU in a lot with SF Attached ADU is NOT allowed in a lot with Duplex or Multifamily
<b>ADU Height</b>	only one story or 15 feet in height
<b>Setback requirements</b>	attached ADU shall be located a minimum of 10 ft from any property line except that when the rear property line abuts an alley with a minimum ROW of 20 ft, the rear setback for an ADU can be reduced to 0 ft, when the rear property line abuts an alley with ROW less than 20 ft, or reduction is approved by the Traffic Engineer.
<b>Utility and sewer connections</b>	No
<b>Parking</b>	one parking per residential use - no specifications for the ADU
<b>Design</b>	Consistent with PDU in scale, material, color, roof pitch, siding, and window proportions.
<b>Additional requirements</b>	Windows are not permitted on the walls of an ADU that is within 10 ft of property line abutting a residential use
<b>ADU</b> – Accessory Dwelling Unit; <b>PDU</b> - Primary Dwelling Unit; <b>ROW</b> - Right-of-Way; <b>Sq.ft</b> – Square feet; <b>ft</b> – feet; <b>gfa</b> – gross floor area	

# Philadelphia

<b>Building Permit requirement</b>	Yes
<b>Attached and Detached</b>	Allows attached and detached ADU.
<b>Owner occupancy</b>	<ul style="list-style-type: none"> <li>• PDU or ADU must be occupied by the owner.</li> <li>• Before the CO of the ADU, the property owner shall record an affidavit and deed restriction, stating that the property owner will reside on the property (either in PDU or ADU)</li> </ul>
<b>Lot size</b>	One ADU per lot - ADU is permitted on lots occupied by single detached and semi-detached houses.
<b>ADU Size</b>	Floor area of an ADU shall not exceed 800 sf
<b>ADU Height</b>	ADU shall not exceed 15 feet in height
<b>Setback requirements</b>	ADU are subject to all applicable regulations of the zoning district in which they are located
<b>Parking</b>	no additional parking is required
<b>Additional information:</b>	
<ul style="list-style-type: none"> <li>• ADU located in a historic district or located on a lot that is listed on the Philadelphia Register of Historic Places is subject to review by the Historical Commission.</li> <li>• Only one entrance to a detached or attached ADU may be located on the front façade that faces a street, unless the house contained an additional street- facing entrance before the ADU was created.</li> <li>• Total area of trash and recycling storage areas may not exceed 25% of the gross floor area in the PDU.</li> <li>• <b>ADU</b> – Accessory Dwelling Unit; <b>PDU</b>- Primary Dwelling Unit; <b>ROW</b>- Right-of-Way; <b>Sq.ft</b> – Square feet; <b>ft</b> – feet; <b>gfa</b> – gross floor area</li> </ul>	



# San Antonio

<b>Building Permit requirement</b>	Yes
<b>Attached and Detached</b>	Attached and detached
<b>Owner Occupancy</b>	<ul style="list-style-type: none"> <li>• Property owner must occupy either the principal unit or the accessory dwelling as their permanent residence</li> <li>• Property owner shall sign an affidavit before a notary public affirming that the owner occupies either the main building or the accessory dwelling</li> <li>• Existence of the accessory dwelling unit shall be recorded with the county recorder and additional covenants as required</li> </ul>
<b>Lot Size</b>	only one ADU per lot.
<b>ADU Size</b>	Minimum of 300 sq. ft and maximum of 800 sq.ft . Attached ADU shall not exceed forty (40) percent of the building footprint of the PDU. Only one bedroom is allowed in an ADU
<b>Setback Requirements</b>	shall be in compliance with the required setbacks of the primary structure required by the underlying zoning district. Additionally, the detached ADU shall require a minimum setback from the rear and side property lines of five (5) feet
<b>Utility and sewer connections</b>	ADU shall be connected to the central electrical, water and sewer system of the PDU. This provision does not apply to the electrical service if the distance between the PDU and ADU is greater than one hundred (100) lineal feet.
<b>Parking</b>	Parking areas shall be located behind the front yard
<b>Design</b>	Consistent architectural design, style, appearance and character of the PDU including roof pitch, siding and window proportions.
<b>Additional information:</b>	<ul style="list-style-type: none"> <li>• Total number of occupants in an detached an ADU is 3; in an attached ADU - its 1 person per 200 sq.ft of gfa.</li> <li>• <b>ADU</b> – Accessory Dwelling Unit; <b>PDU</b>- Primary Dwelling Unit; <b>ROW</b>- Right-of-Way; <b>Sq.ft</b> – Square feet; <b>ft</b> – feet; <b>gfa</b> – gross floor area</li> </ul>

# San Diego

<b>Building Permit requirement</b>	Yes
<b>Attached and Detached</b>	Allows attached and detached ADU.
<b>Owner occupancy</b>	Record property owner enter an agreement with the City (agreement acceptable to the City Attorney Office): <ul style="list-style-type: none"> <li>• ADU and PDU cannot be sold separately</li> <li>• record owner shall reside in the PDU or ADU</li> <li>• this agreement is recoded with the deed.</li> </ul>
<b>Lot size</b>	One ADU per premises
<b>ADU Size</b>	The gfa of the ADU shall not exceed 700 sq feet
<b>ADU Height</b>	Attached ADU (above the garage): max height for flat-roofed structure is 21 feet and the max structure height is 30 feet for sloped roofed structure
<b>Setback requirements</b>	unknown
<b>Utility and sewer connections</b>	unknown
<b>Parking</b>	one standard off street parking is required per bedroom. Off street parking shall not be located into eh area between the street wall and the front property line.
<b>Design</b>	ADU entrance shall not be located on the building street wall or within the front 50% of the street.
<b>Additional information:</b>	
<ul style="list-style-type: none"> <li>• gfa of the ADU shall be included in the floor area ration calculation of the premises.</li> <li>• One tree (24 inch) shall be planted in the front yard of the premises/ in the abutting parkway -existing tree of 15 ft height and 15ft width can satisfy the requirement</li> </ul>	
<ul style="list-style-type: none"> <li>• <b>ADU</b> – Accessory Dwelling Unit; <b>PDU</b>- Primary Dwelling Unit; <b>ROW</b>- Right-of-Way; <b>Sq.ft</b> – Square feet; <b>ft</b> – feet; <b>gfa</b> – gross floor area</li> </ul>	

# San Jose

<b>Building Permit requirement</b>	Yes
<b>Attached and Detached</b>	Allows attached and detached ADU for rental and additional income purpose; allowed in R1 and PD
<b>Owner occupancy</b>	Owner occupancy is required in the PDU or ADU. Evidence and declaration of owner occupancy before the permit is issued for the ADU
<b>Lot size</b>	Minimum lot sizes <ul style="list-style-type: none"> <li>• Attached unit – 6,000 sq. ft.</li> <li>• Detached unit – 8,000 sq. ft.</li> </ul>
<b>ADU Size</b>	<ul style="list-style-type: none"> <li>• lot with 9,000 sq.ft or less - Max ADU size 600 sq ft</li> <li>• lot between 9,001 sq.ft - 10,000 sq.ft s - Max ADU size 650 sq ft</li> <li>• lot above 10,001 sq.ft - Max ADU size 700 sq ft</li> </ul>
<b>ADU Height</b>	Detached ADU shall be limited to a maximum of one (1) story and eighteen (18) feet in height, with an average roof height of no greater than fourteen (14) feet
<b>Setback requirements</b>	Follow the setback requirements of the zoning district in which the ADU is located. ADU shall have a minimum rear setback of fifteen (15) feet, provided that such ADU shall not occupy more than fifty (50) percent of the area between the rear setback otherwise required and said fifteen-foot rear setback
<b>Parking</b>	One (1) additional on-site parking space, in addition to the two (2) required on-site parking spaces for the single-family dwelling, is required for a secondary dwelling.
<b>Design</b>	Constructed with facade materials identical in color, and similar in texture and appearance to the PDU, including: roofing, siding, and windows and doors. ADU should match roof pitch and roof form of the PDU. Front door of any attached ADU shall not be located on the same facade as the front door of the PDU if that facade fronts onto a street.
<b>Additional requirements</b>	<ul style="list-style-type: none"> <li>• Full kitchen (sink, food storage, permanent cooking facilities) and full bathroom is required. Only one bedroom and one bathroom is allowed. Maximum size of the bedroom is 400 sq. ft</li> <li>• cumulative total of the rear yard covered by the secondary dwelling, accessory buildings, and accessory structures, except pools, cannot exceed forty (40) percent of the rear yard.</li> </ul>
	• <b>ADU</b> – Accessory Dwelling Unit; <b>PDU</b> - Primary Dwelling Unit; <b>ROW</b> - Right-of-Way; <b>Sq.ft</b> – Square feet; <b>ft</b> – feet; <b>gfa</b> – gross floor area

# Vancouver

<b>Building Permit requirement</b>	Yes
<b>Attached and Detached</b>	Attached and Detached
<b>Owner occupancy</b>	It can be managed by a management company. However requires a submission of "owner undertaking letter" by the owner or the management company.
<b>Lot size</b>	Minimum lot size of o 33 ft. X 122 ft. (4,026 sq. feet) - minimum ADU size of 280 sq.ft
<b>ADU Size</b>	efficiency/one bedroom to maximum two bedroom ADU
<b>ADU Height</b>	<ul style="list-style-type: none"> <li>• one story and partial second story ADU are allowed.</li> <li>• height of a one story ADU must not exceed 3.7 meters (12.1 foot) height, measured to the highest point of the roof.</li> <li>• no portion of one story ADU shall exceed 4.6 m (15 ft ) in height.</li> </ul>
<b>Utility and sewer connections</b>	<ul style="list-style-type: none"> <li>• before issuing a permit for the ADU, utility inspection will be conducted to meet the future capacity</li> <li>• additional flat fees for water, sewer, garbage and recycling for the ADU (will be part of the annual property tax).</li> </ul>
<b>Parking</b>	<ul style="list-style-type: none"> <li>• houses built before April 20, 2014 - one onsite parking;</li> <li>• houses built after April 20, 2004 - two onsite parking (one for the PDU and one for the ADU)</li> </ul>
<b>Design</b>	<ul style="list-style-type: none"> <li>• Specific guidelines are provided focusing on the access and overlook of the ADU, specifically from the upper lever.</li> <li>• Required to follow guidelines related to the window placement, scale and massing.</li> <li>• ADU on short lots, the roof form, building orientation and widow size and placement should be sensitive the to the relative proximity of neighboring residences.</li> </ul>
<ul style="list-style-type: none"> <li>• <b>ADU</b> – Accessory Dwelling Unit; <b>PDU</b>- Primary Dwelling Unit; <b>ROW</b>- Right-of-Way; <b>Sq.ft</b> – Square feet; <b>ft</b> – feet; <b>gfa</b> – gross floor area</li> </ul>	