

Department of Planning and Zoning

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TO: Development Review Board
FROM: Scott Gustin *SG*
DATE: March 18, 2014
RE: 14-0770SP; 421 Shelburne Street

Note: These are staff comments only; decisions on projects are made by the Development Review Board, which may approve, deny, table or modify any project. THE APPLICANT OR REPRESENTATIVE MUST ATTEND THE MEETING.

Zone: RM Ward: 5

Owner/Applicant: Tabernacle of Worship Assembly of God, Inc. / Youkel Architecture & Devel.

Request: Sketch plan review of renovation and adaptive reuse of existing building as multifamily residential use.

Applicable Regulations:

Article 3 (Applications and Reviews), Article 4 (Maps & Districts), Article 5 (Citywide General Regulations), Article 6 (Development Criteria & Guidelines), Article 8 (Parking), Article 9 (Inclusionary and Replacement Housing), and Article 11 (Planned Unit Development)

Background Information:

The applicant is requesting sketch plan review of a proposed conversion of a nonresidential building into a multi-family apartment building. Two options are included in this sketch plan. One is purely residential with up to 10 dwelling units. The other includes 6 dwelling units with self-storage space in the basement. Both options are proposed under the adaptive reuse provision of Section 4.4.5. Only limited exterior building work and site work is proposed. Most of the work will consist of interior renovations. As this project involves more than 5 new dwelling units, a formal permit application would be subject to major impact review; however, actual impacts are expected to be substantially less than major.

Previous zoning actions for this property are noted below.

- 2/15/02, Approval to install casement windows in basement window openings
- 6/19/01, Approval to change use from garment storage to place of worship
- 3/20/00, Amended approval to allow entire building as office space
- 1/18/00, Approval for conversion to office space and martial arts studio
- 9/23/91, Approval to establish consultant office space with limited retail
- 10/29/91, Approval of three signs
- 2/6/91, Approval of freestanding sign
- 9/24/87, Approval to construct glass show window on northeast corner
- 7/4/85, Approval of freestanding sign

- 4/25/85, Approval for garment storage facility with limited retail
- 3/13/85, Approval to replace side and back windows
- 10/12/83, Approval for parallel sign for public accountant business
- 3/20/73, Approval of a “special exception” for a new parallel sign
- 10/15/68, Approval to establish accounting office use
- 8/25/64, Approval to establish beauty school

Article 3: Applications and Reviews

Part 5, Conditional Use & Major Impact Review:

Sec. 3.5.6, Review Criteria

(a) Conditional Use Review Standards

1. The capacity of existing or planned community facilities;

The proposed development will be served by municipal water and sewer. Sufficient wastewater capacity is available; however, a capacity letter from the Department of Public Works will be required as confirmation. A state wastewater permit will also be needed prior to construction.

2. The character of the area affected;

The subject property is located within a strip of Residential Medium (RM) Density zone along the west side of Shelburne Street. Behind (west) of it lies a swath of Residential Low Density zone. Across Shelburne Street to the east is the City of South Burlington and commercial development.

This criterion calls for consideration of the character of the area as defined by the purpose of the zone within which the project is located. The RM zone is intended primarily for medium density residential development in the form of single family detached dwellings and attached multi-family apartments. Conversion of the existing non-residential building to a multi-family apartment building is consistent with the intent of the RM zone.

3. Traffic on roads and highways in the vicinity;

Little traffic information has been provided beyond a statement that most tenants are not expected to own vehicles. Whether accurate or not, this project is too small to trigger the need for a traffic impact analysis. A formal permit application should, however, contain at least basic traffic projections and the basis thereof.

4. Bylaws then in effect;

The sketch plan submission is insufficient to determine full compliance with applicable city bylaws.

5. Utilization of renewable energy resources;

No information has been provided relative to this criterion.

6. Cumulative impacts of the proposed use;

This criterion stipulates that the cumulative impact of housing, where it is allowed, be considered negligible. Multi-family housing is a permitted use in the RM zone.

7. Functional family;

There is no request to exceed the 4-unrelated adult occupancy limit in any of the proposed dwelling units.

8. Vehicular access points;

See Sec. 6.2.2 (i).

9. Signs;

No signage is included in this proposal. Signs will require separate zoning permits.

10. Mitigation measures;

The proposed residential development will likely not generate offsite noise or glare substantial enough to require mitigation.

11. Time limits for construction;

No time limits for construction have been specified. Given the very large size of the project, a build-out/phasing plan is anticipated. This build-out/phasing plan must be included with the final plat application. Alternatively, project construction will be limited to 2 years.

12. Hours of operation and construction;

Details relative to this criterion have not been provided and will be required as part of a formal permit review.

13. Future enlargement or alterations;

In the event of future enlargement or alteration, permits would be required and reviewed under the regulations then in effect.

14. Performance standards;

Performance standards relating to outdoor lighting and erosion control are addressed under Article 5 of these findings.

15. Conditions and safeguards;

Not applicable for sketch plan.

(b) Major Impact Review Standards

1. Not result in undue water, air, or noise pollution;

No stormwater management details have been provided. As a major impact project, it will be required to provide a stormwater management plan as part of a formal permit application. Although only limited site work is proposed, improvements to existing stormwater conditions will be required.

No significant air or noise pollution is anticipated in light of the proposed use.

2. Have sufficient water available for its needs;

See Sec. 3.5.6 (a) 1.

3. Not unreasonably burden the city's present or future water supply or distribution system;

See Sec. 3.5.6 (a) 1.

4. Not cause unreasonable soil erosion or reduction in the capacity of the land to hold water so that a dangerous or unhealthy condition may result;

Minimal site work is proposed. If it exceeds 400 sf, an erosion prevention and sediment control plan will be required.

5. Not cause unreasonable congestion or unsafe conditions on highways, streets, waterways, railways, bikeways, pedestrian pathways or other means of transportation, existing or proposed;
See Sec. 3.5.6 (a) 3.

6. Not cause an unreasonable burden on the city's ability to provide educational services;
The project would contain up to 10 new studio units. While there may be school age children living there, it is very unlikely that there would be many. There is a direct correlation between dwelling unit type and numbers of school age children living there. Detached single family homes tend to have the highest numbers, whereas small apartment units in multi-family buildings tend to have the lowest numbers. No unreasonable burden on the city's ability to provide educational services will result.

7. Not place an unreasonable burden on the city's ability to provide municipal services;
The proposed development will generate additional impacts on city services. Those impacts, however, are expected to be modest. Impact fees would be due upon completion of the project.

8. Not have an undue adverse effect on rare, irreplaceable or significant natural areas, historic or archaeological sites, nor on the scenic or natural beauty of the area or any part of the city;
See Sec. 6.2.2.

9. Not have an undue adverse effect on the city's present or future growth patterns nor on the city's fiscal ability to accommodate such growth, nor on the city's investment in public services and facilities;

The proposed development will replace a nonresidential use in the RM zone with a multi-family apartment building. It will bring about moderately dense housing consistent with the intent of this zone. Moderate residential growth in this location will not have an undue adverse impact on the city's current or future growth patterns.

10. Be in substantial conformance with the city's municipal development plan;

Insufficient detail has been provided to determine substantial conformance with the city's Municipal Development Plan. Conceptually, however, the introduction of new moderately dense housing in the city's RM zone with easy access to shops, services, and mass transit is consistent with the MDP.

11. Not have an undue adverse impact on the present or projected housing needs of the city in terms of amount, type, affordability and location;

The proposed development will not adversely impact the housing needs of the city. It will provide up to 10 new dwelling units in the RM zone. While unit types within the project are uniform, the project itself will improve the diversity of available housing types in the neighborhood. Inclusionary dwelling units will be required.

12. Not have an undue adverse impact on the present or projected park and recreation needs of the city.

The new dwelling units may produce modest impacts on the city's park and recreation needs. No undue adverse impacts are anticipated.

Article 4: Maps & Districts

Sec. 4.4.5, Residential Districts:

(a) Purpose

(3) Residential Medium Density (RM)

The subject property is located in the RM zone. As stated previously, this zone is primarily intended for medium density residential development in the form of detached single family homes and attached multi-family apartments. The proposed multi-family apartment building is consistent with this intent.

(b) Dimensional Standards & Density

The proposal contains up to 10 residential units. The property is 0.17 acres. Within the RM zone, the base residential density is 20 units per acre (3 dwelling units on this property). The required inclusionary housing raises that density to 25 units per acre (4 dwelling units on this property). More significantly, the adaptive reuse bonus the applicant is seeking limits density only by way of floor area of the existing structure. There is no specified density limit. As such, 10 dwelling units may be permissible.

Lot coverage of up to 48% may be allowed in the RM zone for developments with inclusionary housing units. In this case, no increase in lot coverage is proposed. A small rear building entry will be removed and will result decreased coverage.

Setbacks and building height will remain unchanged.

(c) Permitted & Conditional Uses

The multi-family apartment building is a permitted use in the RM zone. As an adaptive reuse project, it is subject to conditional use review. So-called Option B, with 6 apartments and a basement storage facility, would not be permitted. Self-storage facilities are not allowed in the RM zone, nor are they a “neighborhood commercial use” as defined in Article 13 of the Comprehensive Development Ordinance.

(d) District Specific Regulations

1. Setbacks

No setback encroachments are sought.

2. Height

Not applicable in RM.

3. Lot Coverage

No lot coverage exceptions are sought.

4. Accessory Residential Structures and Uses

Not applicable.

5. Residential Density

All of the proposed residential units are subject an occupancy limit of 4 unrelated adults or a family as defined in the CDO.

6. Uses

Not applicable.

7. Residential Development Bonuses

The applicant is seeking an adaptive reuse bonus. As such, the building must be on the state or national historic register. The building is on the Vermont historic register. The proposed gross floor area shall not exceed 125% of the existing gross floor area (GFA). As proposed, GFA will actually decrease. The underlying density limits shall not apply. Density shall be limited by the GFA. Density in this proposal is limited as such. Building rehabilitation shall comply with the standards of Sec. 5.4.8. Compliance with this criterion cannot be determined based on the sketch plan materials. Neighborhood commercial uses of up to 2,000 sf may be allowed; however, as noted before, the potential self-storage facility is not a neighborhood commercial use as defined in Article 13 of the CDO. Lot coverage shall not exceed 48% or expand beyond 125% of existing building coverage. No increase in lot coverage is proposed. The project appears as though it would qualify for the adaptive reuse bonus, assuming the standards of Sec. 5.4.8 are met.

Article 5: Citywide General Regulations

Sec. 5.2.3, Lot Coverage Requirements

See Sec. 4.4.5 (b) above.

Sec. 5.2.4, Buildable Area Calculation

Not applicable.

Sec. 5.2.5, Setbacks

See Sec. 4.4.5 (b) above.

Sec. 5.2.6, Building Height Limits

No exceptions are sought.

Sec. 5.2.7, Density and Intensity of Development Calculations

See Sec. 4.4.5 above.

Sec. 5.4.8, Historic Buildings and Sites

No materials have been provided to address the historic building standards of this criterion. Such details will be required with a formal permit application.

Sec. 5.5.1, Nuisance Regulations

Nothing in the proposal appears to constitute a nuisance under this criterion.

Sec. 5.5.2, Outdoor Lighting

No outdoor lighting information has been provided. Such information will be required with a formal permit application.

Sec. 5.5.3, Stormwater and Erosion Control

As noted previously, no stormwater details have been provided. A formal application will require a stormwater management proposal subject to review by the Conservation Board and the Stormwater Administrator.

Article 6: Development Review Standards:

Part 1, Land Division Design Standards

Not applicable.

Part 2, Site Plan Design Standards

Sec. 6.2.2, Review Standards

Limited site changes are proposed and are limited to the removal of an enclosed rear building entry. Details are lacking as to what will become of this area. Such details will be needed with the formal permit application.

Part 3, Architectural Design Standards

Sec. 6.3.2, Review Standards

No architectural details have been provided and will be needed with a formal permit application. The sketch plan narrative states that roofing will be replaced with standing seam material on sloped areas and with EPDM on the flat front roof. The existing windows will be replaced, but no materials are specified.

Article 8: Parking

Sec. 8.1.8, Minimum Off-Street Parking Requirements

The subject property is located in the neighborhood parking district. As a result, each dwelling unit requires 2 parking spaces – a total of up to 20 parking spaces in this case (assuming the maximum proposed 10 dwelling units). Only 6 parking spaces are actually available onsite. A parking waiver is requested per Sec. 8.1.15 below.

Sec. 8.1.15, Waivers from Parking Requirements/Parking Management Plans

If 10 dwelling units are constructed, the available 6 onsite parking spaces amount to only 30% of the required parking. Typically, parking waivers are limited to 50% of the minimum requirement; however, up to 100% of the minimum required parking spaces may be waived for the adaptive reuse of a historic building.

A parking management plan has been submitted. The management plan refers to the “right” to use at least two additional parking spaces on the adjacent property portion of the 12-space shared parking lot. The adjacent property which shares the parking lot contains a triplex. As such, it requires all 6 parking spaces on its portion of the shared lot. Nothing in the zoning permit record indicates a parking waiver for the triplex. There are no spare spaces under the standards of Sec. 8.1.8. The parking management plan goes on to note the potential 100% waiver for adaptive reuse projects, its proximity to shops, services, and transit, and the small studio unit types. It also notes that offstreet parking would not be included in the rents. Indeed, the property is located close to shopping and services in both Burlington and South Burlington. A CCTA stop is located in front of the building. Small studio dwelling units are more apt to be occupied by one person than larger units. Separating offstreet parking from the basic rent eliminates the expectation that each dwelling unit will contain a private parking space. Collectively, these items favor a parking waiver of 50% - 1 space per dwelling unit. To go beyond 50% to the full 70% waiver that would be needed for 10 dwelling units, the parking management plan needs to enable alternative transportation options for tenants beyond simply being close to a bus stop. The parking management plan needs to provide assurance that actual vehicle ownership among tenants will be equivalent to, or less than, available onsite parking. A management plan that actually provides

tenants with bus passes and/or membership and use of Carshare Vermont or similar service could justify the parking waiver requested.

Sec. 8.2.5, Bicycle Parking Requirements

Bicycle parking details are lacking. There is only a statement noting that secure onsite bike parking will be provided to tenants free of charge. The maximum proposed 10 dwelling units would require two long term spaces and two short term spaces. Bicycle parking details as to number, type, and amenity will be required with a formal permit application.

Article 9: Inclusionary and Replacement Housing

Sec. 9.1.5, Applicability

As the proposed development includes more than 5 new dwelling units, it is subject to the inclusionary housing provisions of this Article. Fifteen percent of the total unit count must be inclusionary. In this case, if the maximum 10 dwelling units are constructed, 2 of them must be inclusionary.

Article 11: Planned Unit Development

Sec. 11.1.6, Approval Requirements

As more than 5 dwelling units in a single structure are proposed, this project qualifies as a minor PUD. As such, it is exempt from the standards and provisions of this article except that inclusionary housing must be provided as noted above.

Burlington Comprehensive Development Ordinance Article 3.2.1(c) Sketch Plan Review:

Upon request of the applicant, or as may be required under Art. 10 - Subdivision or Art. 11 - Planned Development of this ordinance, a Sketch Plan Review may be scheduled before the DRB prior to the submission of an application in order to provide the applicant with constructive suggestions regarding a conceptual development proposal. In order to accomplish these objectives, the applicant shall provide the following:

- 1. A brief narrative and preliminary concept showing the locations and dimensions of principal and accessory structures, parking areas, and other planned features and anticipated changes in the existing topography and natural features.***

Our concept involves the adaptive reuse of an existing historic structure currently approved for use as a Church at 421 Shelburne Street, in the medium-density residential (RM) zoning district. The application will be made under Article 4.4.5-7(c) "Adaptive Reuse Bonus" of the CDO.

The building provides an interesting example of early modern architecture in the neighborhood. It has had a variety of non-residential uses since its construction, including professional office (as headquarters of an accounting firm) then later as a warehouse use (for fur storage) before its most recent use as a house of worship. The concept for the proposed use is principally multi-unit residential with a potential neighborhood storage concept that we would ask the DRB to consider as a Neighborhood Commercial Use (Article 4.4.5-6).

The Project will rehabilitate and restore the existing historic façade and original building in accordance with Article 5 of the CDO and federal and state historic guidelines. Existing exterior brick finishes would be retained, and new roofing would be proposed (a combination of EPDM rubber roofing on flat areas, and galvanized standing seam metal on sloped areas). Existing aluminum windows would be replaced with special attention paid to maintaining historic proportion and detail while improving energy efficiency.

Although Article 4.4.5-7(c) contemplates potential additions to gross floor area of up to 25%, we feel that in this case the building is already well-suited to its site and additional development is not warranted. Rather, a small earlier addition not integral to the original design would be removed as shown on the attached plans. This addition is not visible from Shelburne Road.

Vehicular access is from the rear via a shared private alley along the rear property line with curb cuts on Fergusson Avenue from the north and Lyman Avenue to the south, shared in common with all properties on the block. No new curb cuts are proposed.

Parking has been historically handled via a twelve-car paved parking lot that is shared with the Property to the immediate west, together with off-site parking leases elsewhere in the immediate vicinity. We propose to continue the existing shared parking arrangement and feel that it will serve the needs of the Project and meet the intent of the Ordinance. This would require a Parking Waiver under Article 8.1.15 which permits up to 100% of the parking requirement be waived for adaptive reuse projects of this sort.

The applicant has two variations on its plans for the proposed use of the building, and is seeking input from the DRB before finalizing its application:

Option A) Up to ten studio residential apartments, a permitted use, contained within the original building.

Option B) Six studio residential apartments, a permitted use, and being the same layout proposed for the upper floors of the building as Option A. On the ground floor, there would be secured storage units that could be rented by residents as well as by other neighborhood residents. This would require a finding by the DRB that such a use is consistent with a "Neighborhood Commercial Use" allowed under 4.4.5-6(a) and Article 13.

2. ***A sketch or map of the area which clearly shows the location of the site with respect to nearby streets, rights-of-way, properties, easements and other pertinent features within 200 feet.*** A locational map is included in the attached Sketch Plan Submission.
3. ***A topographic or contour map of adequate scale and detail to show site topography and the relationship to adjoining properties.*** See attached Sketch Plan Submission. No changes in grading are proposed.
4. ***Payment of the applicable Sketch Plan Review fee.*** A check in the amount of \$300 for sketch review per the July 1, 2013 fee schedule is attached.

Proposed Parking Management Plan

From Sec. 8.1.15 Waivers from Parking Requirements/ Parking Management Plans:

The total number of parking spaces required pursuant to this Article **may be reduced** to the extent that the applicant can demonstrate that the proposed development **can be adequately served by a more efficient approach that more effectively satisfies the intent of this Article** and the goals of the municipal development plan to reduce dependence on the single-passenger automobile. Any waiver granted shall not exceed fifty percent (50%) of the required number of parking spaces **except for the adaptive reuse of a historic building pursuant to Sec. 5.4.8** and ground floor retail uses in any Mixed Use district **which may be waived by as much as one hundred percent (100%)**. Waivers shall only be granted by the DRB, or by the administrative officer pursuant to the provisions of Sec. 3.2.7 (a)7.

...

“In order to be considered for a waiver, the applicant shall submit a Parking Management Plan that specifies why the parking requirements of Sec. 8.1.8 are not applicable or appropriate for the proposed development, and proposes an alternative that more effectively meets the intent of this Article.”

Calculation of the parking spaces required pursuant to Table 8.1.8-1

<u>For Option A:</u>	<u>20 Parking Spaces</u> , calculated as follows: 10 studio multifamily residential units at 2 spaces/unit
<u>For Option B:</u>	<u>13 Parking Spaces</u> , calculated as follows: 6 studio multifamily residential units at 2 spaces/unit.
+ manager	1 space for Warehouse – Self Storage facility with no resident (Requirement is 1 space /100 leasable storage spaces, 10 proposed)

It should be noted that under the proposed parking changes that have recently passed the Planning Commission, the parking requirement for this project would be **10 Spaces for Option A** and **7 for Option B**.

Request for Parking Waiver

We propose to maintain and continue the current practice, which is to maximize the amount of land used for parking through the existing shared 12 parking space lot. This provides clear and permanent use of 6 parking spaces located on the property, plus the right to use additional spaces in the shared lot, usage of which would be confirmed by written agreement acceptable to the City. We anticipate two additional spaces will be available at minimum (for a total of eight). The currently approved parking plan for the Church involves tandem spaces that are no longer permitted under the ordinance. These would not be continued.

As such we are asking that the Project be allowed to proceed using the existing shared parking infrastructure (6 spaces on site + minimum 2 spaces on adjoining lands).

Narrative

It is worth noting that adaptive reuse of historic structures is one of only two circumstances under which a 100% parking waiver can be considered by the DRB. This clearly acknowledges the challenges of meeting parking requirements on sites where buildings are already in place, and the

intent is clearly that a higher value should be placed on the productive reuse of historic buildings versus any strict measure of parking.

In considering the uses most appropriate for this site -- which although zoned residential is located on a very busy roadway with principally commercial uses across the street -- we felt that it was important to embrace its urban character while respecting the residential nature of neighboring properties. It has a transit stop immediately in front connecting it with many employers both downtown and along the Route 7 corridor to the south. It is within close walking distance to a number of shops, restaurants, cafes, and grocery stores. It is, in fact, one of the few locations outside of downtown Burlington in which residents can meet all their daily needs without a car or extensive use of transit.

Our proposal of urban studio apartments is designed to accommodate the growing number of one-person households in the area looking for an affordable alternative to renting larger apartments with roommates in order to be able to live in the neighborhood affordably.

The project would have no employees, clients, shifts, or deliveries other than typical residential postal deliveries that would be easily handled via the existing shared-access alleyway. In Option B, the hours of access for the storage use would be limited to daytime and early evening hours, and the nature of the use suggests infrequent, short-term parking for loading and unloading only. We feel the existing shared 12-car lot would easily absorb such a demand and dovetails nicely with the residential use whose highest demand is overnight.

Our expectation is that very few tenants in the building will actually have cars. This is the case in units in adjoining buildings, even where much larger units are concerned. For example, the rental apartment next door has six bedrooms in three units and has historically required only 1 or 2 parking spaces to meet its needs according to its owner. Given the design and layout of our units, we feel that the existing shared lot will easily accommodate the parking needs of the project, even during times of highest demand which would be for overnight use in winter months during parking bans.

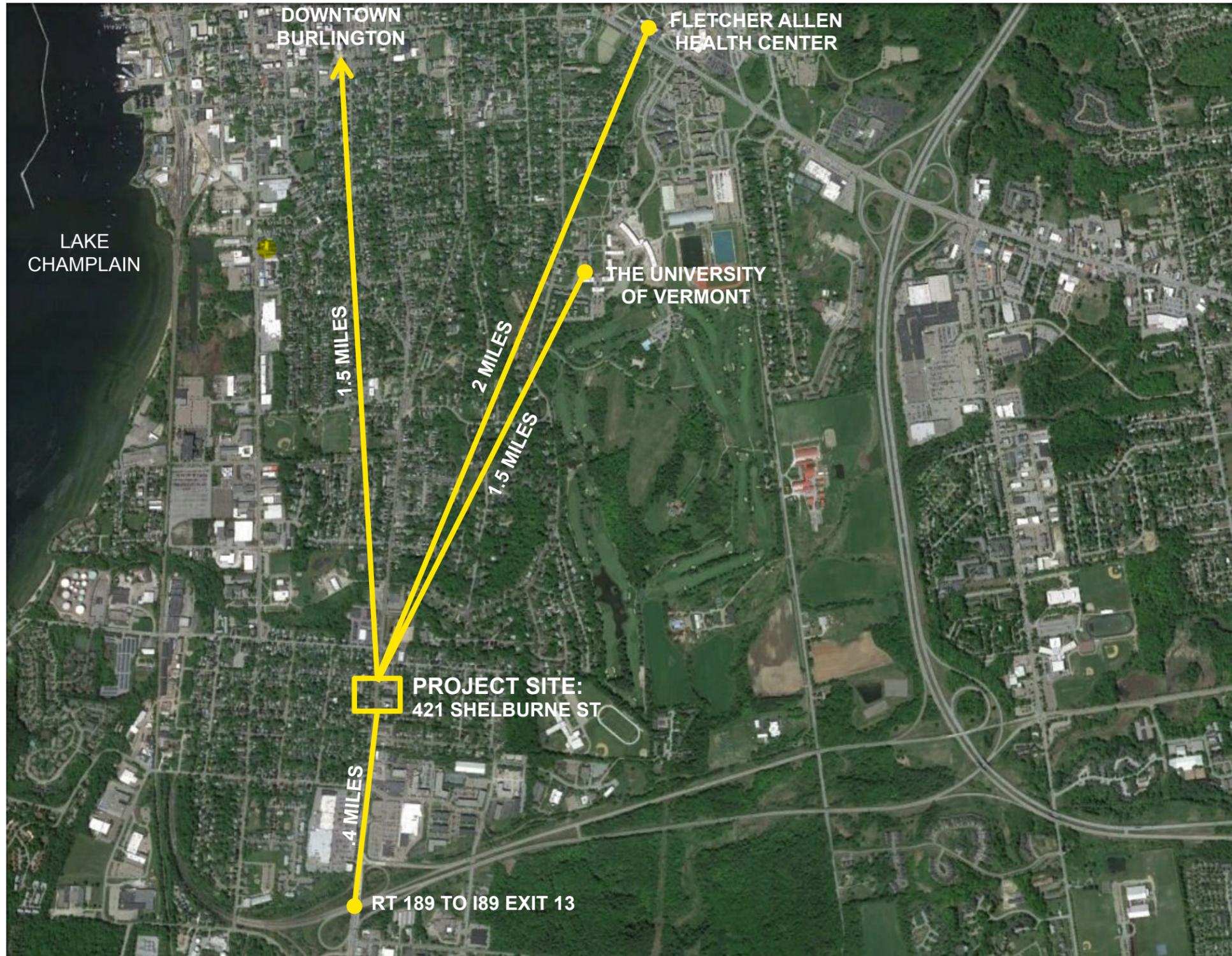
There is a CCTA bus stop located in front of the building on the same block with direct sidewalk access. Daily services, houses of worship, parks, and shops are within easy walking distance, as are many area employers.

Demand Strategies Proposed

We have proposed to manage the demand for parking in the following principal ways:

- 1) Secure indoor bicycle storage will be provided to tenants at no cost.
- 2) Off-street parking would not be included in rents. This will create a more affordable rental opportunity for those who decide not to have a car, and afford tenants the choice to apply those funds to other transit passes or car sharing fees if they prefer that alternative.
- 3) The design of the building and units encourages minimal parking requirements. The stated parking requirement is not consistent with actual practices for this neighborhood, which attracts tenants who walk and use alternative transport.

We acknowledge the Ordinance's stated requirement that a plan "shall identify strategies that the applicant will use to reduce or manage the demand for parking into the future". However, we feel that the examples provided, such as a telecommuting program, or participation in demand management associations are more suited to commercial uses and would not be the appropriately-scaled tools for this site. A primary purpose of the sketch plan review request is to discuss this with the DRB and obtain feedback.



421 SHELBURNE STREET | Burlington, VT Location Plan

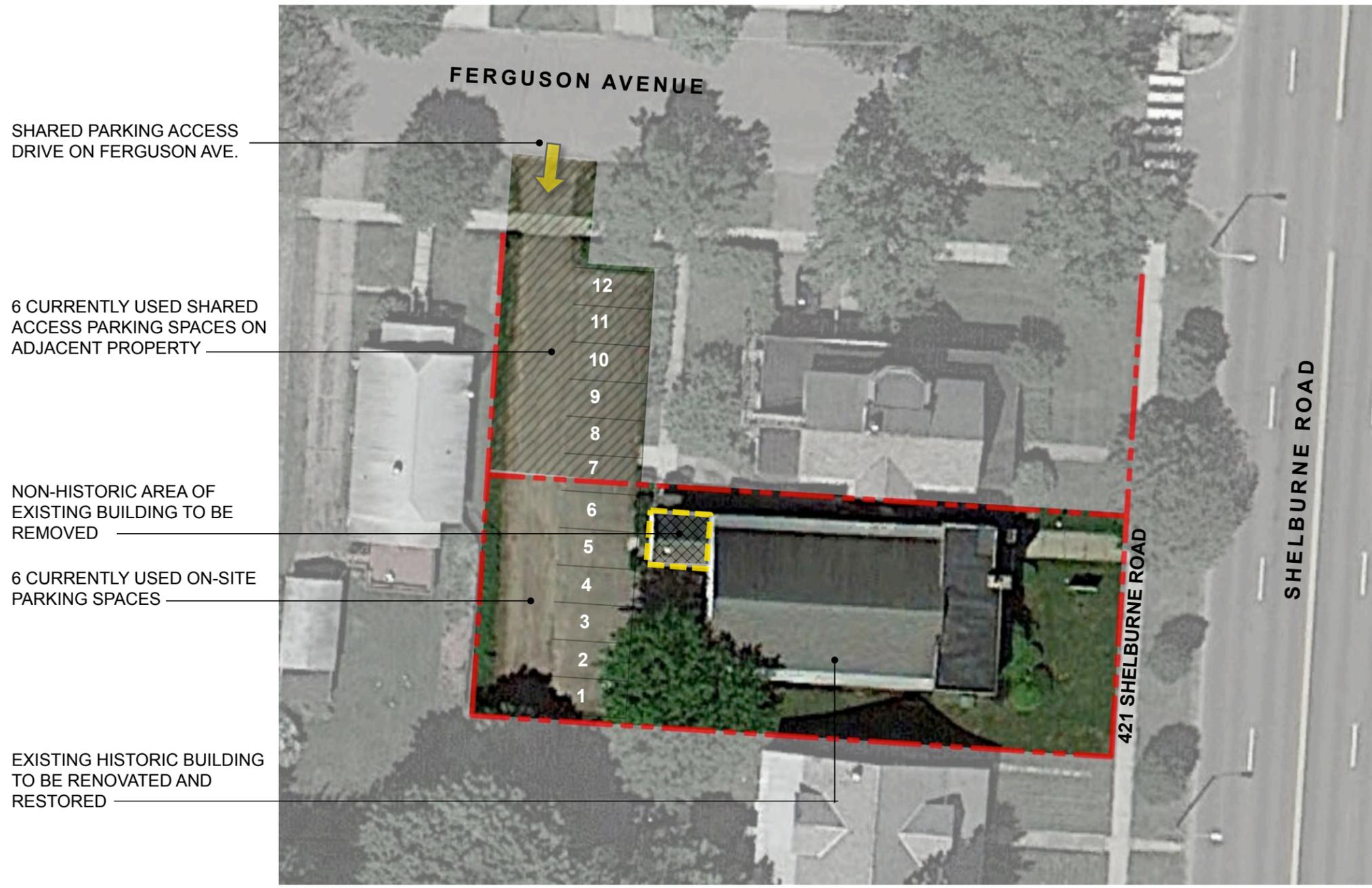
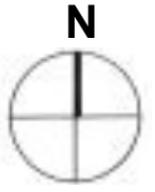
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February 19, 2014

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421 SHELburne STREET | Burlington, VT
Site Plan scale: 1" = 30'-0"

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SOUTH-WEST VIEW ALONG SHELBURNE ROAD | BUILDING ENTRY



NORTH-WEST VIEW ALONG SHELBURNE ROAD



VIEW OF WEST FAÇADE FROM PARKING



NORTH-EAST VIEW FROM PARKING



VIEW OF SOUTH FAÇADE FROM PARKING

421 SHELBURNE STREET | Burlington, VT Existing Conditions Photos

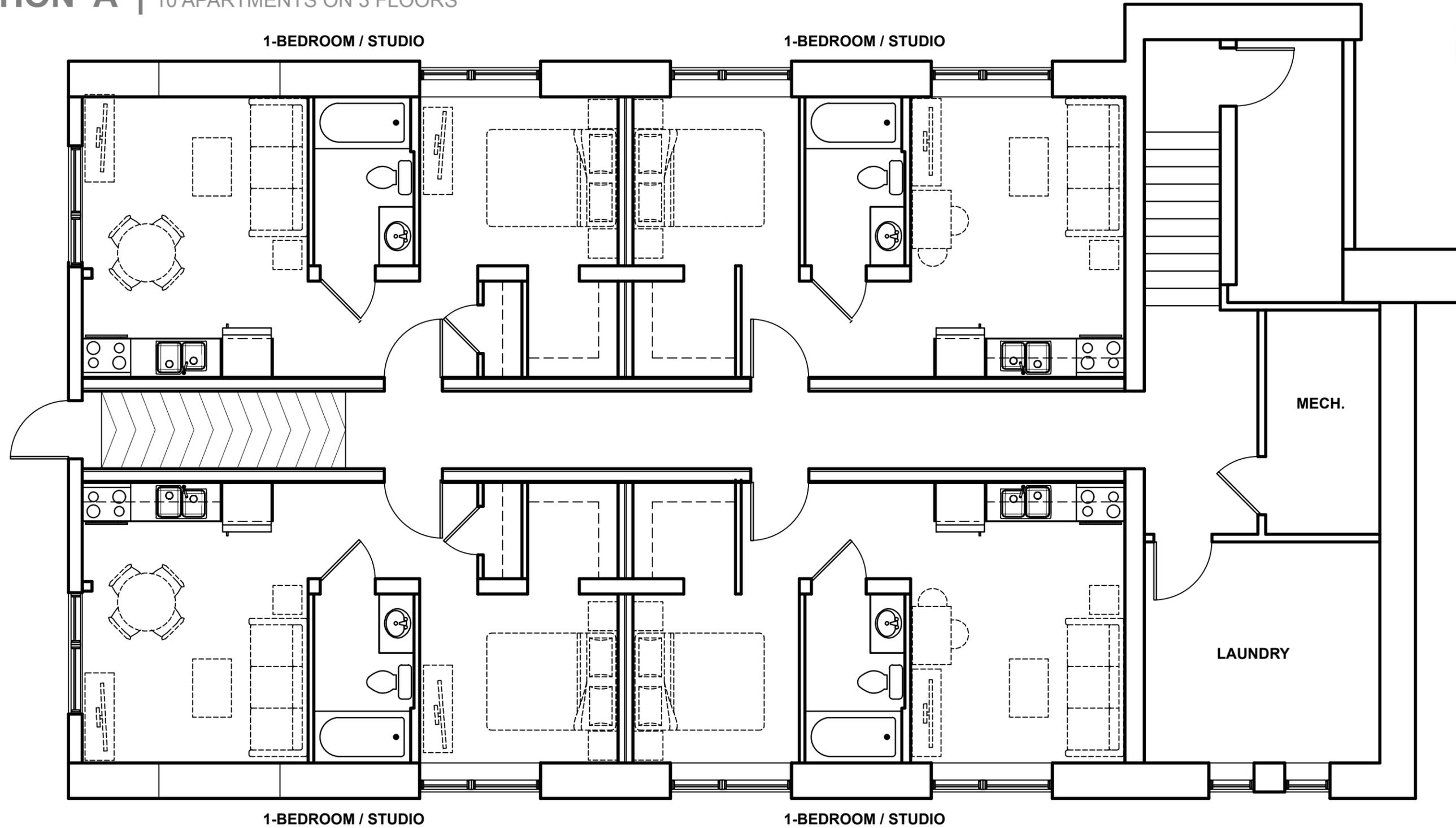
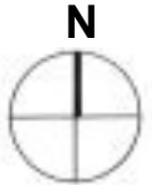
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OPTION 'A' | 10 APARTMENTS ON 3 FLOORS



421 SHELBURNE STREET | Burlington, VT
OPTION 'A': Ground Floor Plan scale: 3/16" = 1'-0"

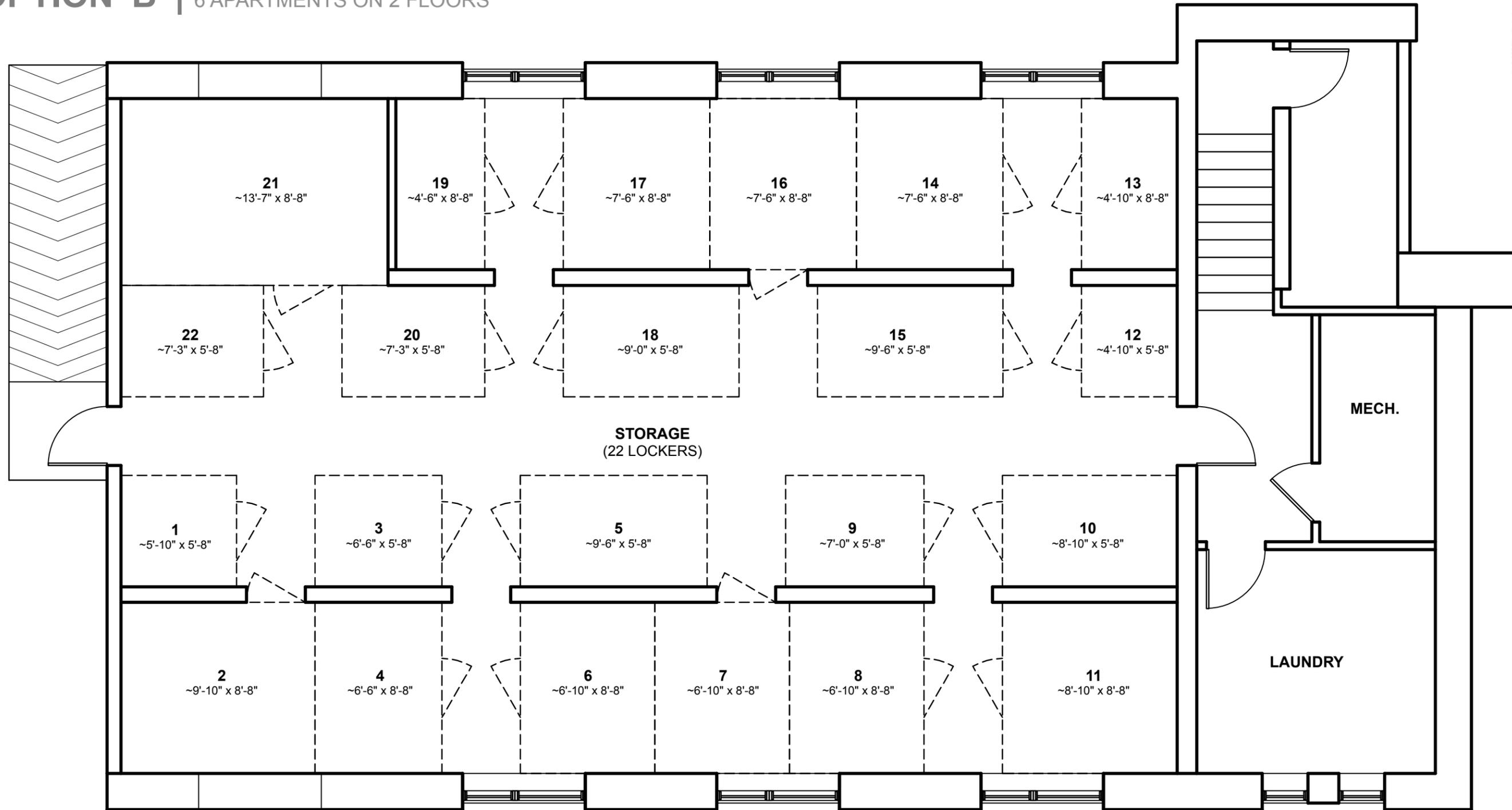
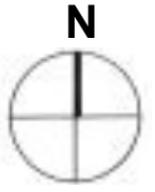
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OPTION 'B' | 6 APARTMENTS ON 2 FLOORS



421 SHELBURNE STREET | Burlington, VT
OPTION 'B': Ground Floor Plan scale: 3/16" = 1'-0"

NOTE:
 UNIT AREAS ARE MEASURED FROM EXTERIOR OF EXTERIOR WALLS TO EXTERIOR OF CORRIDOR WALLS TO CENTERLINE OF DEMISING WALLS

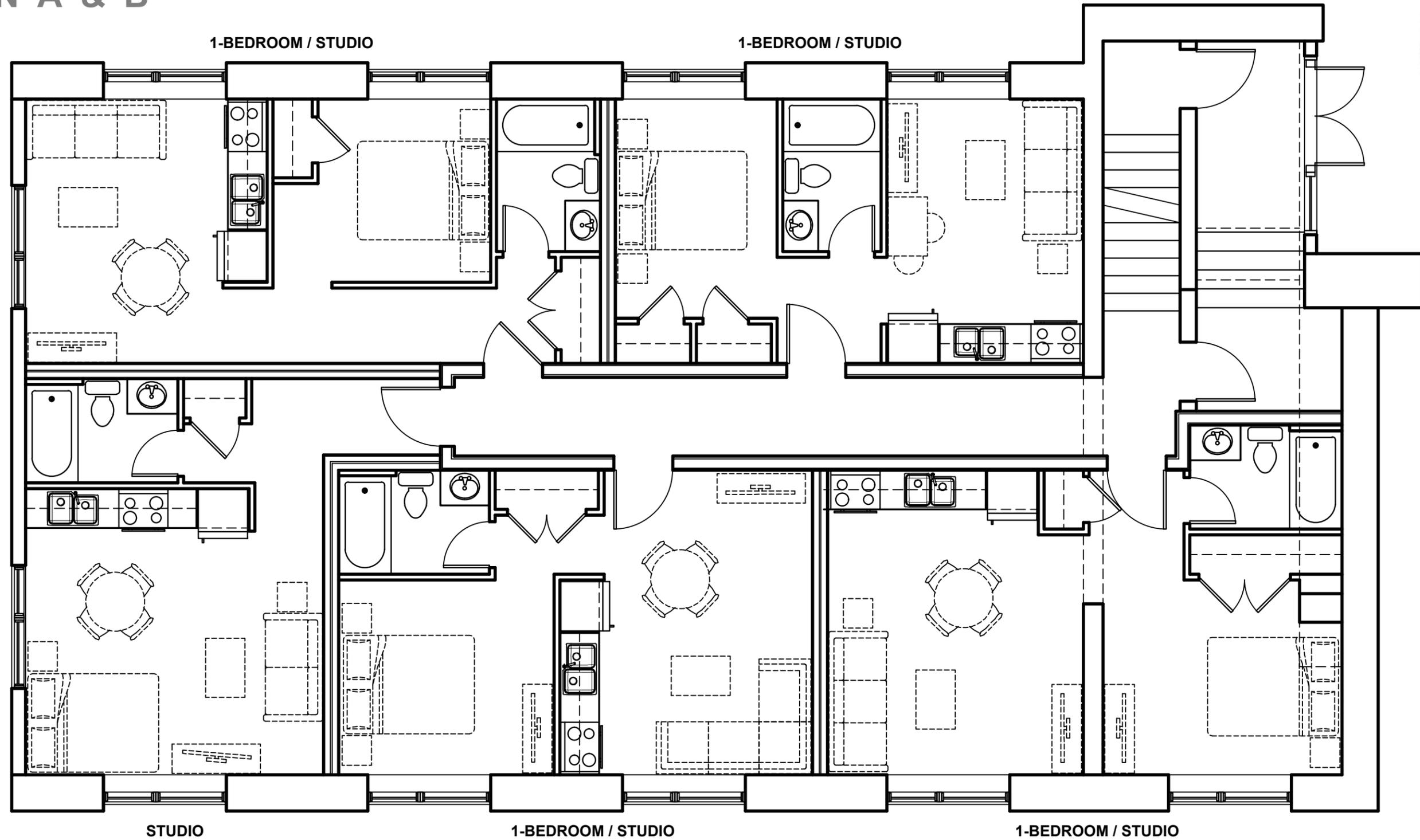
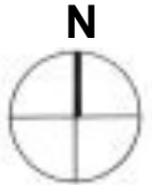
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OPTION 'A' & 'B'



421 SHELBURNE STREET | Burlington, VT
OPTION 'A' & 'B': First Floor / Entry Plan scale: 3/16" = 1'-0"

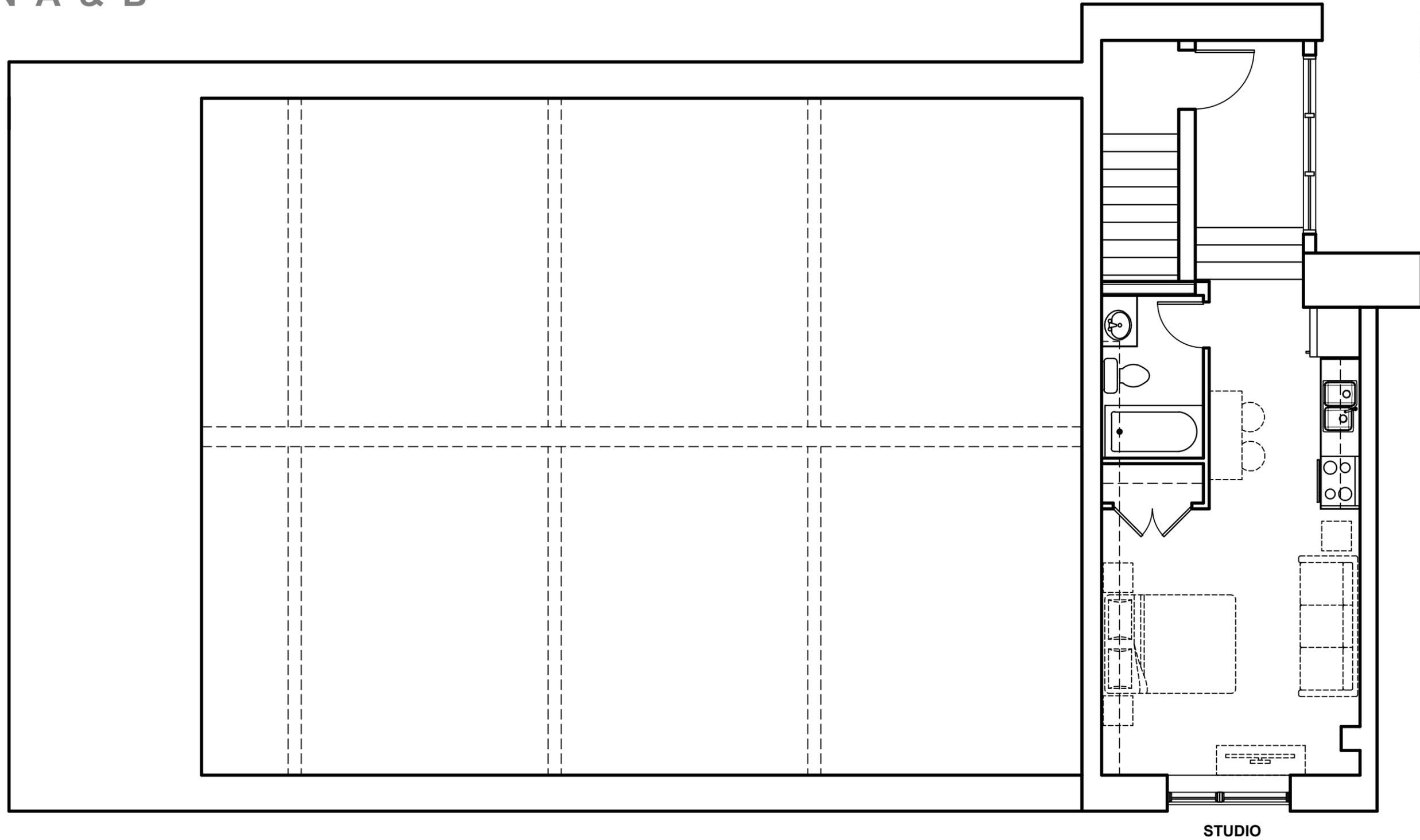
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OPTION 'A' & 'B'



421 SHELBURNE STREET | Burlington, VT
OPTION 'A' & 'B': Second Floor Plan scale: 3/16" = 1'-0"

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