

**Town of Dracut
Building / Zoning Dept.**

Memo

To: Mr. Chairman, Dracut Zoning Board of Appeals.
From: Daniel McLaughlin, Inspector of Buildings.
cc: Alison Manugian
Date: 10/17/2025
Re: What is a Two and a Half story building?

Dear Mr. Chairman, Members of the Board.

This dimensional requirement (2.5 stories and 36' in height to the mid-point of the gable roof, Table 4.4) comes from the 4th Edition of the MA State Building Code. It was changed to 3 stories and 40' in the 5th Edition, in 1990.

It was not defined, either in the State Building Code or the Dracut Zoning Bylaw, but was widely assumed to mean that the 3rd floor could only be $\frac{1}{2}$ of the floor area of the floors below. The alternative would be restricting the 3rd floor to $\frac{1}{2}$ of the height of the floors below, which makes no sense. Generally, this involved finishing the attic of a gable-roofed house, with knee-walls which cut the floor area down to $\frac{1}{2}$ that of the floor below – although it could also involve a 2 story flat-roofed building, with a penthouse which was $\frac{1}{2}$ the floor area of the floor below.

What constitutes a “floor above grade” may be important in this situation. This is defined in the Building Code, as follows:

“Any story having its finished floor surface entirely above grade plane, or in which the finished surface of the *floor next above* is either of the following:

1. More than 6 feet above grade plane.
2. More than 12 feet above the finished ground level at any point.”

So, for example, the "raised ranches" which we're familiar with from the 1970s would be considered a single-story building, as the floor of the 2nd floor is generally not more than 6 feet above average grade, or 12 feet above grade at any point. Garden style apartments are similarly not considered to be a story above grade.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Brughli". The signature is written in a cursive, flowing style with a large initial "J" and a long, sweeping underline.