An aerial architectural rendering of a city, likely Belmont, Massachusetts. The scene is dominated by a dense grid of white, blocky buildings of varying heights. In the upper right, a large, grey blimp with the word "utile" written on its side is flying over the city. The background shows a body of water with many small sailboats and a larger ship. The overall style is clean and modern, with a focus on urban form and scale.

Belmont Form-based Zoning Framework

July 2, 2024

**Responses to July 2 Memorandum
(For discussion purposes only)**

Responses to July 2 Memorandum

Categorized by topic

1. Site dimensional standards

- a. Lot coverage vs building footprint
- b. Building footprint comparisons
- c. Questions about site standards

2. Building dimensional standards

- a. Building height definition
- b. Questions about building height assumptions
- c. Half-story building heights
- d. Questions about half-story pitched roof vs stepbacks
- e. Questions about facade articulation

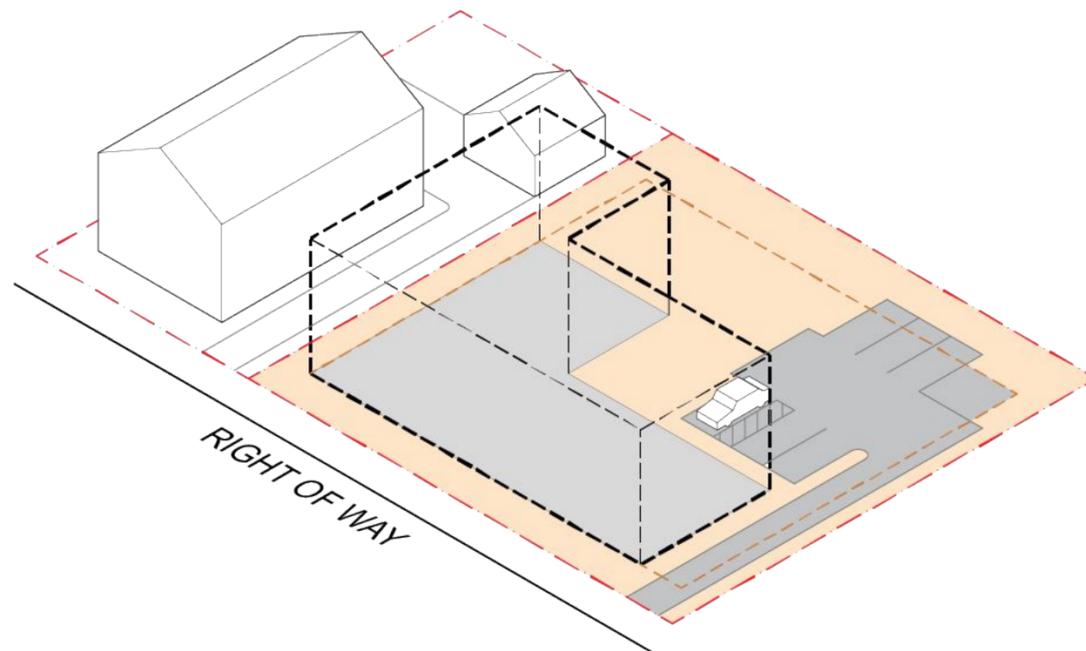
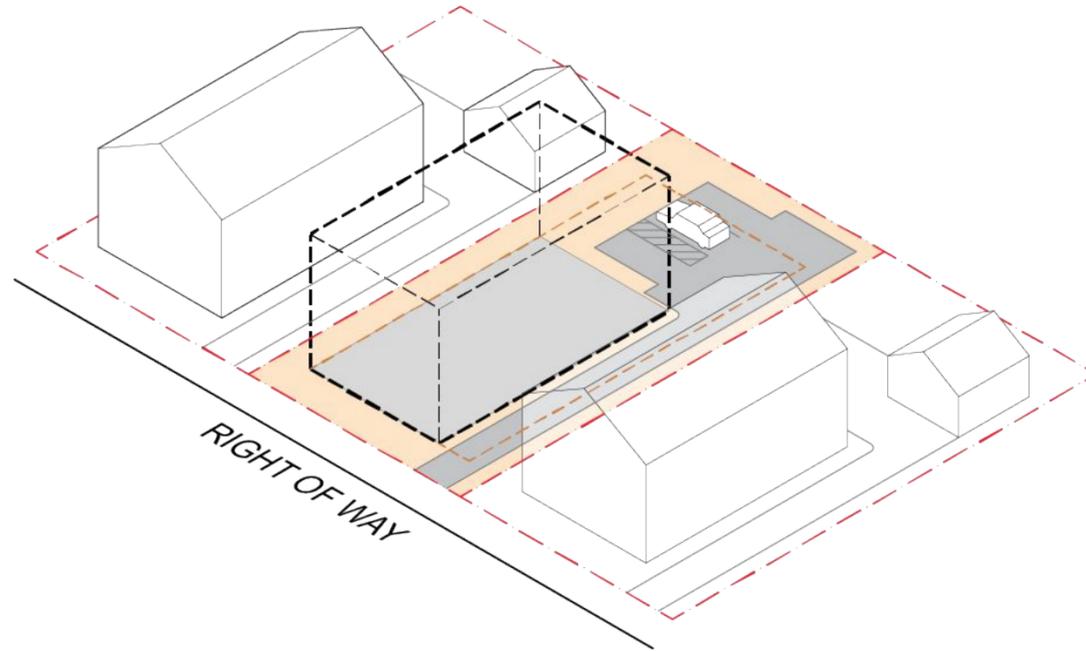
3. Other questions

- a. Questions about definitions
- b. Questions about parking design standards
- c. Questions about design guidelines
- d. Other questions

Site Dimensional Standards

- Lot coverage vs building footprint
- Building footprint comparisons
- Questions about site standards

Existing Site Standards



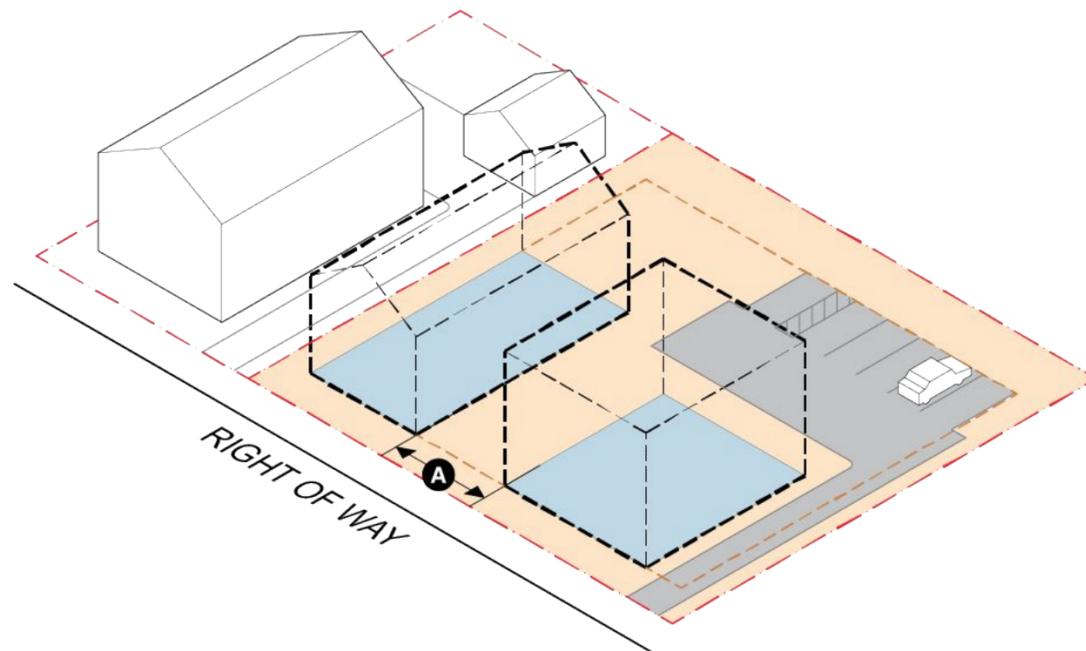
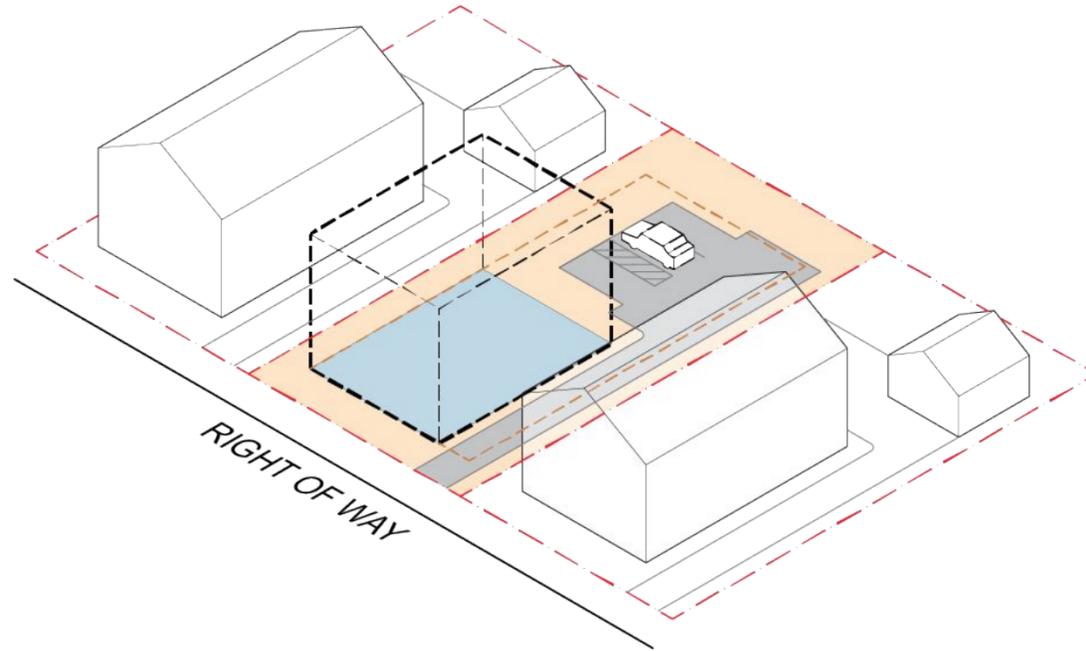
-  Lot area
-  Setbacks
-  Open space (max. in percentage of lot area)
-  Lot coverage (max. in percentage of lot area)

- Current zoning uses maximum lot coverage, expressed in a percentage of lot area, to control building scale
- In larger or combined lots, this could produce unpredictable built forms incompatible with the desired neighborhood character
- For example, if lot coverage for a certain zone is capped at 30%,
 - Buildings with up to 1,800 sf coverage are allowed on 6,000 sf lot
 - Buildings with up to 2,400 sf coverage are allowed on 8,000 sf lot
 - Buildings with up to 4,000 sf coverage are allowed on 12,000 sf lot (e.g. 2 combined 6,000 sf lots)

Definitions from Belmont Zoning Bylaw

- *Open Space* - An open area on a lot, unbuilt on, containing landscape materials, pedestrian walks, patios, recreational facilities, but excluding driveways and parking spaces.
- *Lot Coverage* - Percentage of total lot area covered by structures or roofed.

Proposed Site Standards



- Lot area
- Setbacks
- Open space (max. in percentage of lot area)
- Building footprint** (max. in sq. ft.)
- A **Min. building separation distance**

- In lieu of maximum lot coverage, the proposed site standards use maximum building footprint to control building form. Maximum building footprint is a fixed footprint area irrespective of lot area.
- In larger or combined lots, maximum building footprint ensures the building forms are predictable and compatible with the desired neighborhood character
- For example, if the maximum building footprint for a certain zone is 1,800 sf,
 - Buildings with up to 1,800 sf footprint are allowed on 6,000 sf lot
 - Buildings with up to 1,800 sf footprint are allowed on 8,000 sf lot
 - Buildings with up to 1,800 sf coverage are allowed on 12,000 sf lot (e.g. 2 combined 6,000 sf lots)
- Multiple buildings on the same lot are allowed, provided the minimum building separation distance is met.
- Other standards such as setbacks, parking minimums, and open space ratio still apply.

Building Footprint Examples

Recommended maximum building footprint for SD1: 1,800 sf



Building Footprint Examples

Recommended maximum building footprint for SD2: 4,000 sf



Questions about Site Standards

****P. 5, Dimensional Standards**, Lot line definitions and lot frontage definition in base zoning should be the same. Open Space should utilize base definition. Let's not create new when we have something that works. Again, simplify the language. (td)

Utile response: This makes sense to us.

****P. 5**, If you are setting different standards for open space, beneficial open space, etc., every category should be listed in the table. Burying them in the text only is problematic. (dk)

Utile response: Beneficial open space only applies to outlier lots sized 30,000 sf or larger in the MXDZ4 and MOZ5 zones. For reference, there is currently only **one** such lot in the latest compliance map. Open to re-evaluating whether this sub-section is needed.

****P. 6, Dimensional Standards**, For MOZ 1 and 2 why is the setback larger from a SR zone? Not necessary in my opinion. (td)

Utile response: Open to removing the higher setbacks from lots abutting an SR district.

****P. 6, Dimensional Standards**, Can UTILE discuss the need for the max building footprint? It seems to me that the size of the lot determines the max building footprint. I want to understand the maximum of 10,000 sf for SD 4 and 5. (td)

Utile response: For SD 4 and 5, 10,000 sf was selected as the maximum building footprint based on our earlier test-fits. Larger developments can still occur with the 10,000 sf max footprint by:

- Non-by-right process (e.g. special permit)
- Multiple buildings, each not exceeding 10,000 sf footprint

Questions about Site Standards

****P. 6, Why no frontage requirements for subdistricts 1, 2, 4, and 5? (cjr)**

Utile response: We removed lot frontage requirements for simplicity - parking minimums and maximum building footprints will sufficiently determine whether the lots in the zoning map are viable.

****P. 6, Can we provide for a 5'/10' split for side yard lot lines if driveway access must be via front yard? (Ara Yogurtian [ay])**

Utile response: Yes, we agree with adding this provision.

****P. 6., What is the purpose of the Parking Setbacks Facing ROW? Certainly, we do not want front yard parking. Is this if it is adjacent to side yard? (cjr)**

Utile response: This is to discourage parking in the front yard.

Building Dimensional Standards

- Half-story building heights
- Building height definition
- Questions about building height assumptions
- Questions about half-story pitched roof vs stepbacks
- Questions about facade articulation

Building Height Definition

Existing Belmont Zoning Bylaw 1.4

- Height, Building - The vertical distance from the grade to:
 - the highest point of the roof or parapet for flat or shed roofs;
 - the midpoint between the lowest and highest points of the roof for gable, hip and gambrel roofs (upper roof pitch 4” per foot or greater); or
 - the point of change in roof slope for mansard roofs (upper roof pitch under 4” per foot).

Proposed definition for MBTA Communities district

- The height of a half-story is measured vertically from the surface of the finished floor to the top of the highest roof beam above.

Questions about Building Height Assumptions

****P. 6, Dimensional Standards**, We need a review and discussion of the height and stories. I do not think we should regulate the height of any stories except ground floor commercial. I think height is all we need. (td)

Utile response: We agree generally. The heights for other stories shown in parentheses were included as a reference for how we arrived at the total building heights, and are not intended to be included as part of the zoning text.

****P. 6, Building Height**, Is this really the maximum height, or the average height once the developers do all of their games with averaging, slope, and above-ground portions of a basement story? Based on text descriptions later, it seems like it is not really the maximum height. Even at this level, it is a massive structure replacing what is often now a single story commercial structure abutting a neighborhood. The heights for a given number of stories seem higher than similar structures with the same number of floors elsewhere in town; the reasons for these discrepancies are not clear.

****P. 7, Building Commissioner asks why the floor heights are so tall?** IBC and state building code require 7'6" minimum and if assuming rounding up to 8' with a 12" floor spacer, that gives 9" per floor other than ground floor retail of 15' so if we used that figure of 9', a 2.5 story step-back building would top out at 27' plus roof parapet or something like no more than 32', correct? (ay)

Utile response: The main tool we recommend for regulating building height is setting a maximum number of stories. In terms of maximum building heights in feet, our assumptions are as follows:

- Ground level (12' resi or 15' commercial)
- Typical level (11')
- Top level - full-story (12')
- Top level - half-story step-back (12')
- Top level - half-story pitched roof (18')

While these are the theoretical maximums, the market will most likely build with the lowest viable floor-to-floor heights.

Half-story Building Heights

18 ft

MOZ2, MXDZ4, MOD5:
max height to the top of highest
roof beam above

12 ft

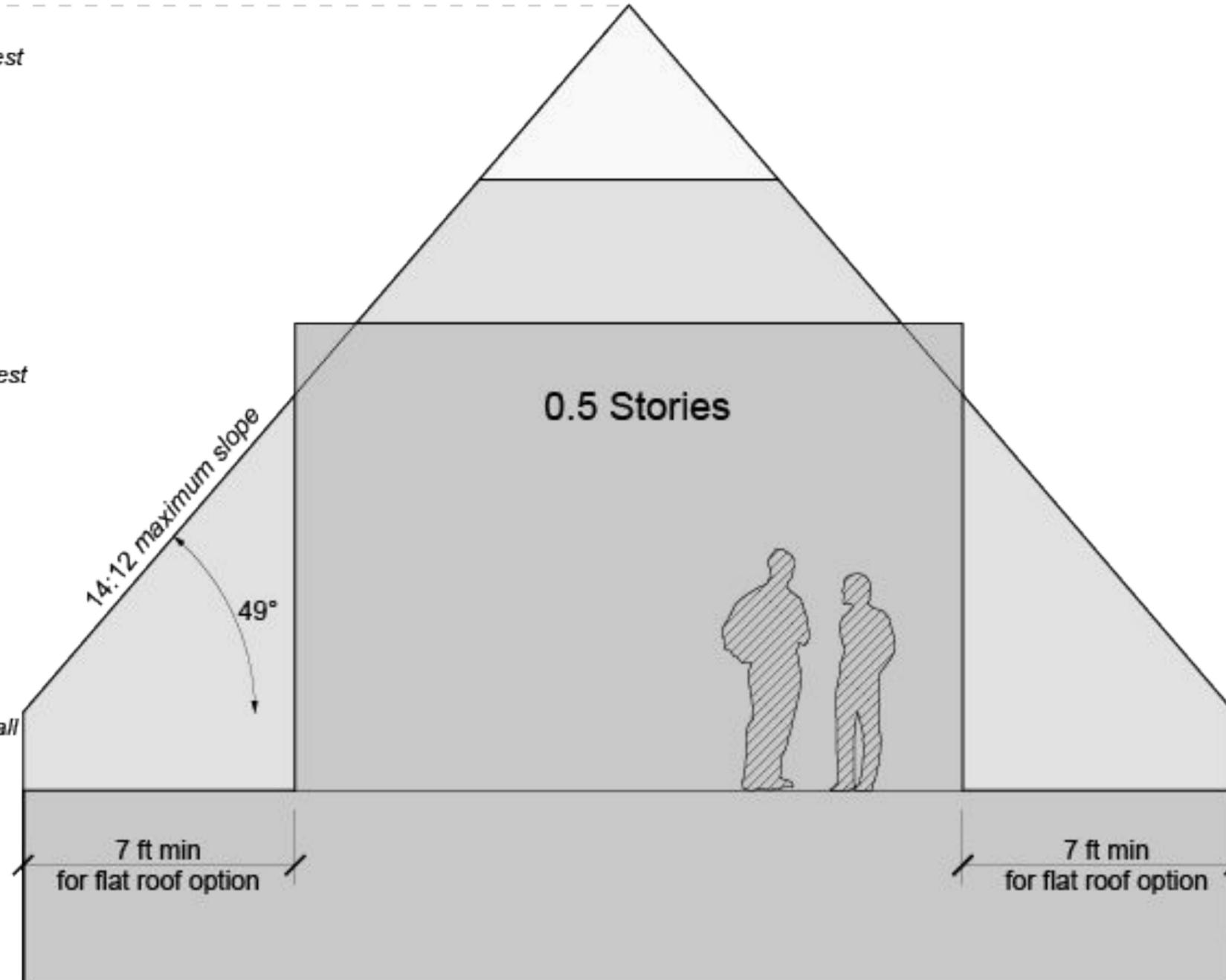
MOZ2, MXDZ4, MOD5:
max height to the top of highest
roof beam above

2 ft

max height rafter intersect wall

0 ft

Floor Level



Questions about Half-story Pitched Roof

****P. 10, Building Height**, As currently defined, this is a maximum peak only on flat roofs. For pitched roofs, it is the average, so some peaks will be higher than the maximums listed. If that peak happens to be the one closest to an SR home, the fact that somewhere else on the site next door is lower will be little comfort to the abutter right next to the high point. (dk)

Utile response: See proposed building height measurement method.

****P. 13, Graphic**, Will the images now be used in the other sections of the zoning bylaw as well? In some cases, the illustrated attributes seem to have exceptions. For example, the step back applies only on sides abutting SR lot lines. Further, at the 6/25/24 PB meeting, Thayer noted that the pitch on the roofs were steeper than what she normally sees and that the drawings looked off to her. (dk)

Utile response: Need clarification of which graphic this is referring to

Questions about Half-story Step-backs

****P. 7, Half-Story Step-Back in Feet,** No idea if this a adequate, and how it compares to what was done in the Bradford development. Assumedly, step-back areas would become open space decks, which would then allow the structure to fill more of the ground-level square footage. Also confusing is that the requirements in the table seem to conflict with what is in the bylaw text below. (dk)

Utile response: More context needed regarding the Bradford development - we will review with the Town further. Ground-level square footage will be limited by maximum building footprint in any case.

****P. 14, Half-Story Step Back for Flat Roofs, Sub d.,** The dimensional table listed setbacks as applying to all sides, but the bylaw text stipulates there is no step-back for any side not abutting a residential district. This will make the buildings seem larger for those on site (such as when multiple buildings are on the same site) and may also mean the Utile unit counts are being understated (if they are assuming the half story has setbacks on all sides). (dk)

Utile response: For the subdistricts where the top story is a half story, step-backs are required on all sides if pitched roofs are not provided.

****P. 14, Half-Story Step Back for Flat Roofs, Sub e2.,** The purpose of the step-backs was to reduce the sense of scale of the new structure for that upper floor (the heights and allowable stories have generally been increased by Chris and Utile since earlier iterations, raising significant public concerns). This clause appears to effectively boost the allowable stories and height for many parcels by ½ story above what is shown in the dimensional tables. (dk)

Utile response: We will re-evaluate the appropriateness of this exception below borrowed from the reference code:

“Any portion of the half-story set back more than twenty-five (25) feet from any lot line is exempt from the upper story step-back requirement, except when the lot line abuts a residential district.”

Questions about Façade Articulation

****P. 8, Length of Continuous Façade**, At the Bradford development, the approved designs had variation in the structure of the façade, such as bays and other approaches to break up the boring blockiness. This was all stripped out in their “value engineering” process once Toll Bros took it over. The language in this section should be evaluated in that context. Simply slapping on a different type of cladding to break up an otherwise uniform façade doesn’t cut it in my view. (dk)

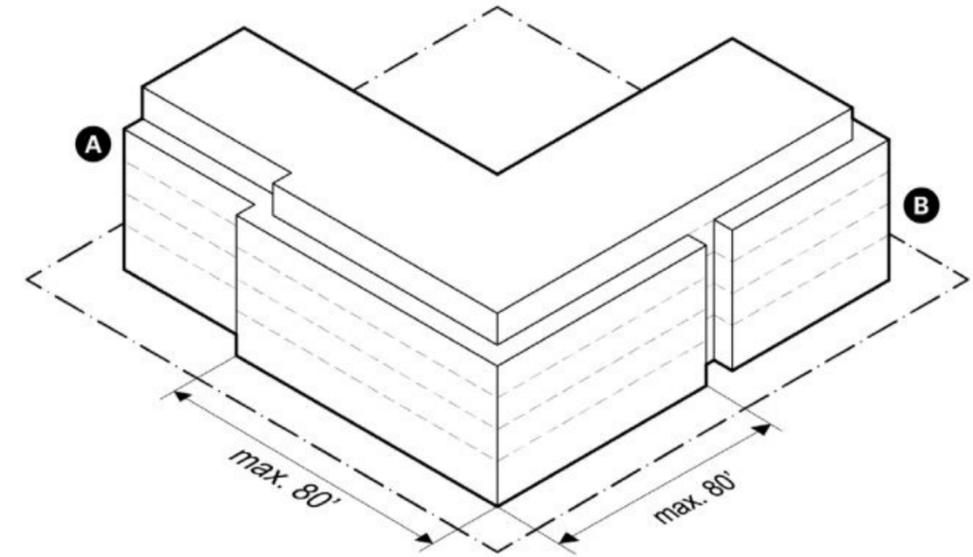
****P. 21, Façade Articulation**, We should discuss facade articulation. I agree with the concept. I do not necessarily like the deep notch solution in the language. (td)

****P. 21, Façade Articulation, Sub 12.**, While the requirements for the front façade are helpful, the language for balconies is not. Cookie-cutter balconies along a massive rectangular building will still be boring and ugly, and do not have the same visual effect as the articulation and variation required on the front. (dk)

CJR: This will be passed along to Utile for comment. My guess is that in this case, uniformity in design and the provision of desirable leasable spaces is more important than articulation for its own sake.

Utile response: Open to re-evaluating which facade articulation rules are most appropriate for Belmont. Current draft provisions are as follows:

- a. The front elevation of any building greater than eighty (80) feet in width must be divided vertically by a recess or an offset at least seven (7) feet deep and ten (10) feet wide for the full height of the building, excluding:
 - 1) The half-story.
 - 2) Any portion of the ground story with ground story active uses as defined in §9.6.B.9.
- b. Balconies and awnings may be located within the recess or adjacent to the offset.
- c. Balconies and bays may be utilized to satisfy the façade articulation requirements in this section.



Other Questions

- Questions about definitions
- Questions about parking design standards
- Questions about design guidelines
- Other questions

Questions about Definitions

§9.4 Definitions

****P. 4**, Asked whether a better definition could be provided such as, "...rear lot line is the line that connects to two side lot lines?" or add that to supplement? (cjr)

Draft zoning text: "Rear Lot Line - Any lot line, other than a lot line that is a side lot line of an abutting property, which is parallel to or within forty-five (45) degrees of being parallel to a front lot line."

Utile response: The definition in the draft text helps clarify which lot lines are considered side or rear lot lines in more ambiguous cases such as corner lot. Open to other ways of defining side and rear lot lines.

****P. 4**, Is not "Lot Width" typically measured at the building setback line? (cjr)

Draft zoning text: "Lot Width - The length of the front lot line of a lot."

Utile response: Open to other ways of interpreting lot width.

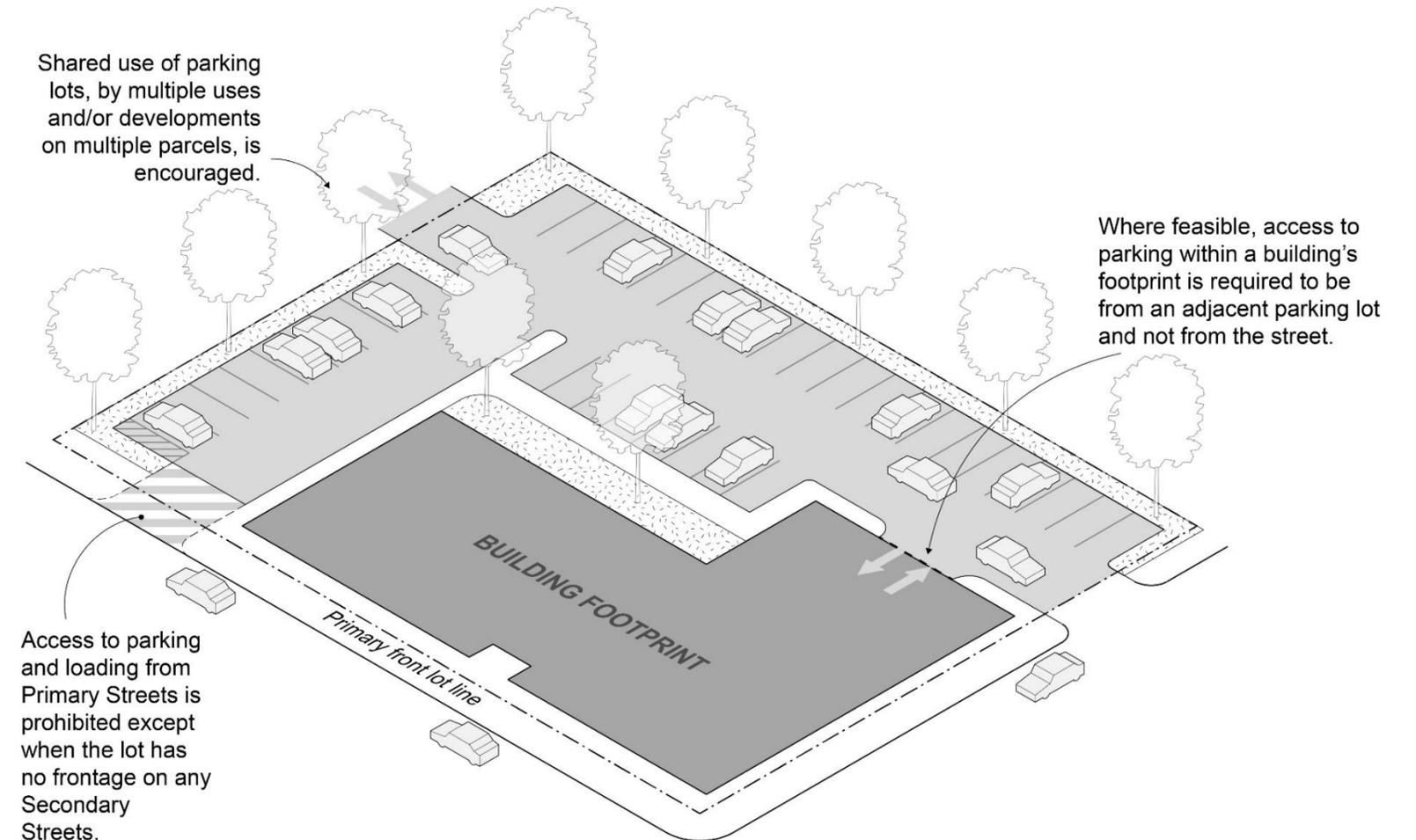
Questions about Parking Design Standards

****P. 22, Parking Design Standards**, Can we get rid of parking and bike regs and defer to the existing bylaw for those items? Shorter is better and potentially conflicting sections of the bylaw are not advisable. (td)

CJR: Not certain our bylaw has this in sufficient detail that relate to the building types proposed.

****P. 22, Parking Design Standards, Sub 1.**, Utile recommends simplifying or removing bicycle parking requirements, our bylaw is not descriptive currently. DK says, “Seems like some bike standard ought to remain given that one of the justifications many have presented when arguing we should reduce or eliminate automobile parking minimums is that everybody is on their bikes now...” Maybe you can just bring it in by reference from the general bylaw language, if it is there. (dk)

CJR: DK has a good point here to keep a version of it.



Questions about Design Guidelines

****P. 8, Site Design Standards,** In many public meetings, the design standards were presented as the tool through which Belmont could ensure high quality buildings were built, and fit within the context of the town. I recall there being design and site plan review, and also architectural standards, discussed. I see bylaws governing scale and placement on a site, and amenities such as trees. But I don't see terms that would give the town any leverage to shape a problematic design with low quality materials. What terms does the town see doing that? At the PB meeting on 6/25, Chris noted that some proposed language had been stripped out by Town Counsel. We should have a realistic sense of what controls we do and don't have on these structures. The erosion of design and site plan review as a tool may require adoption of different dimensional standards to backfill. (dk)

CJR: Materials will be in design guidelines as my understanding is that DSPR can only apply standards universally in town. I'd ask Utile to comment on that to confirm. Town Counsel as well. What is being provided both in 3A and 7.3 will be the extent to which we can legally require provisions for review. Design guidelines will be another tool, but not a robust one.

****P. 29, Design Guidelines,** The Chair asks if the design guidelines are going to be in a separate .pdf document, and this is a good question.

CJR: At this point the design guidelines are proposed to be a TBD and developed subsequent to 3A. We can try to craft a set now if it is deemed important to do so.

****P. 29,** We need to explain the difference between architectural standards in the bylaw and design guidelines outside of the bylaw (cjr)

Other Questions

****P. 8**, subsections 2a and 2b are still not clear enough for layperson explanation. Can these be merged or at least better distinguished? (cjr).

Utile response: Yes. These two subsections are a relic from the zoning code we referenced which has different rulesets for the overlay districts and the base zoning.

****P. 8, A2d**, What is this clause doing? Is it just clarifying that the least-restrictive setback rules apply? And if that is the case, wouldn't that mean that somebody could retain the underlying zoning (say, SR), but build it bigger and closer to the property line under this carve out related to 3A? (dk)

CJR: We have asked for additional clarification from Utile on this provision. Any provision like this still must be reviewed by Town Counsel, who may ask for additional clarifications.

Clause: For the limited purposes of determining the applicable setback requirements, if an abutting property is within a MXDZ4 or MOZ5 district the abutting property shall be deemed to be in such Overlay District and not the underlying zoning district regardless of whether such abutting property has opted-in.

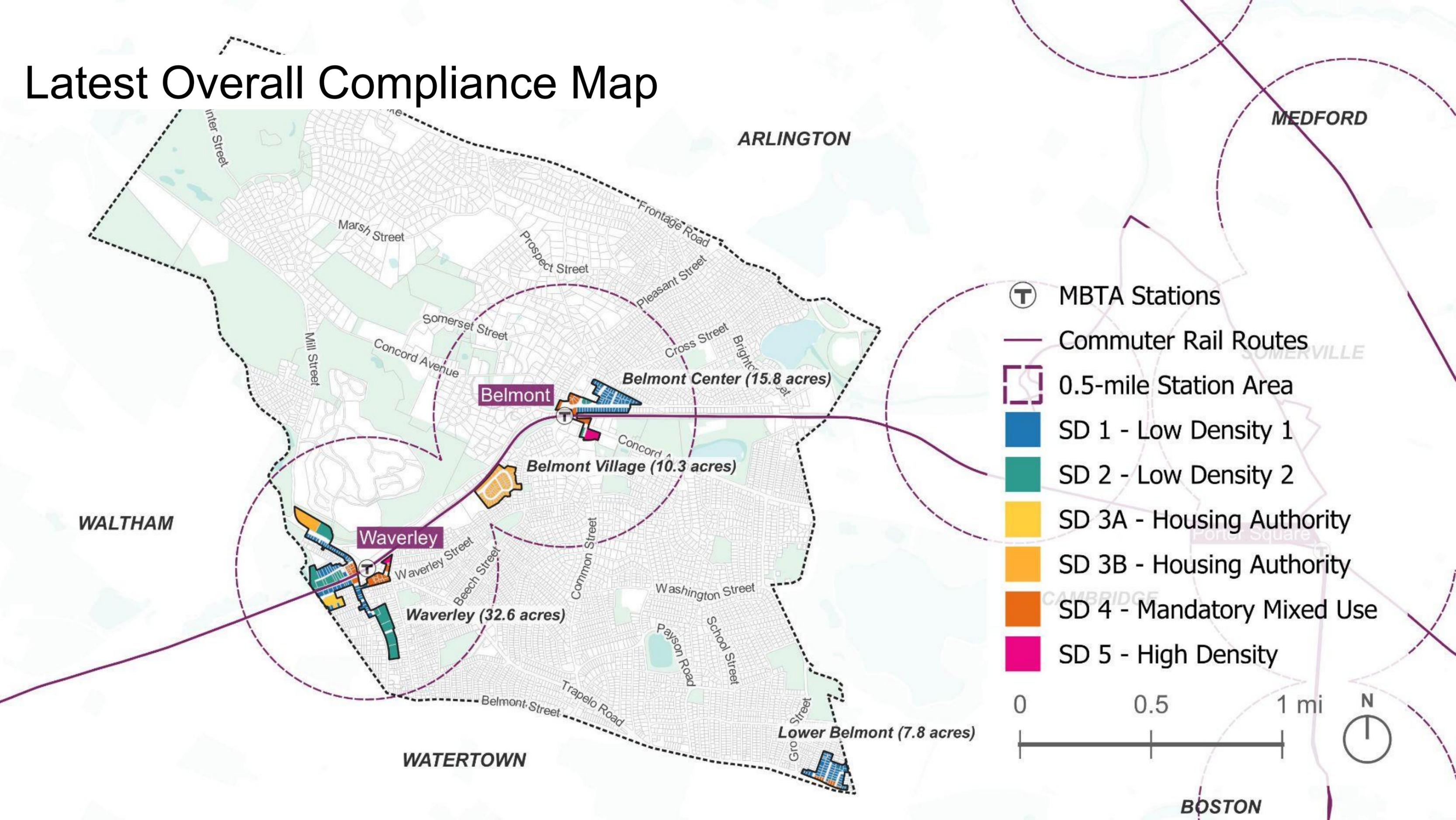
Other Questions

****P. 22, Mechanical Equipment, Sub c.**, Please provide examples where this has been done well. Even if you move them so they don't dump exhaust on pedestrians, this affects a small number of vents (e.g., on ground and maybe second floor). However, independent of that effect, a wall of dryer vent outlets on the main road looks ugly as all get-out (and was prohibited at the Bradford as a result of resident input). This would be a particular concern for SD4, where residential units would face commercial district rights-of-way. (dk)

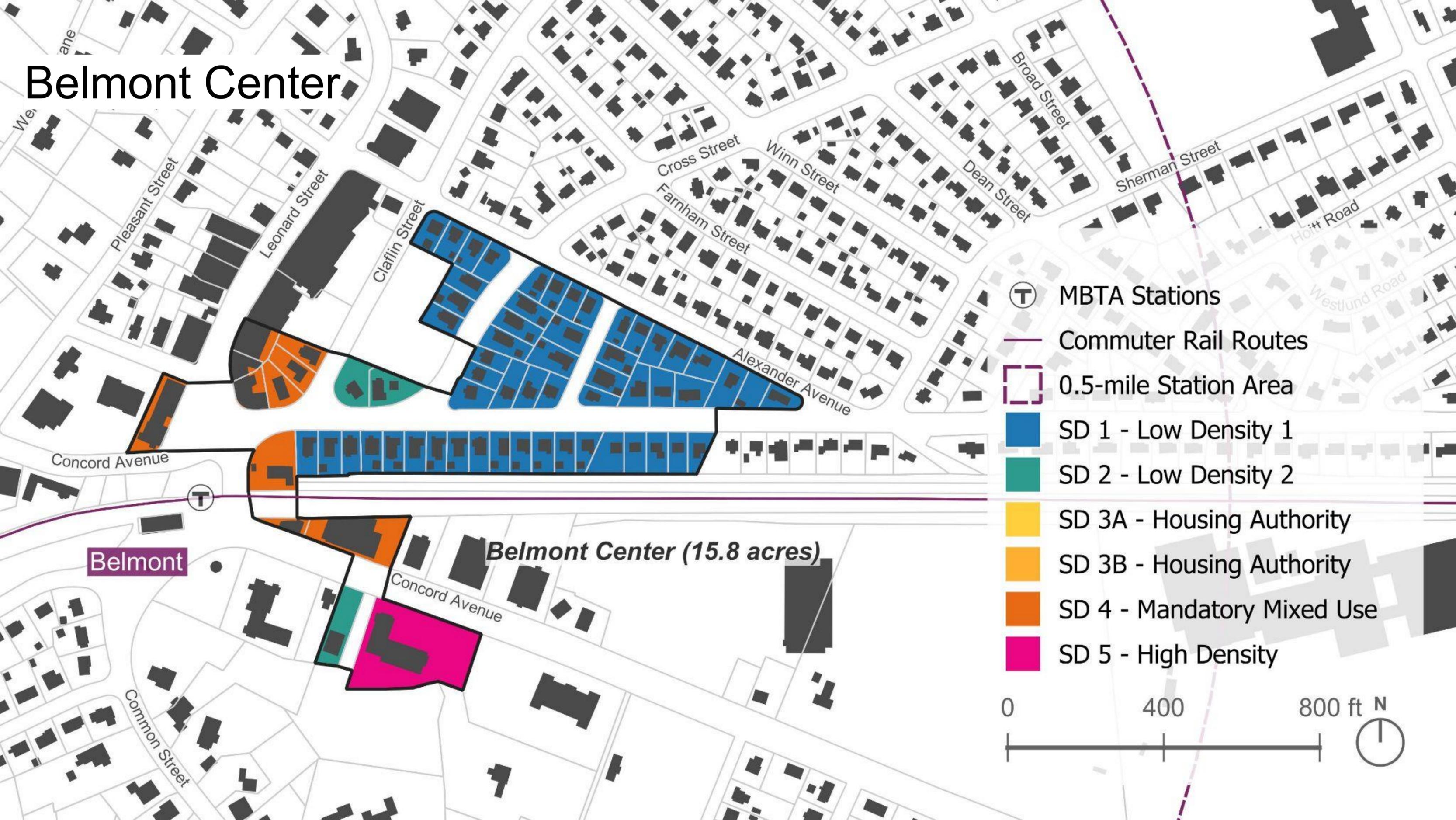
Clause: c. Wall-mounted mechanical, plumbing, and/or electrical equipment such as louvers, exhaust equipment, and duct vents along the front elevation must be architecturally integrated into the design of the building and located to minimize adverse effects on pedestrian comfort along sidewalks and within open spaces.

MBTA Communities Compliance Maps & Model Results

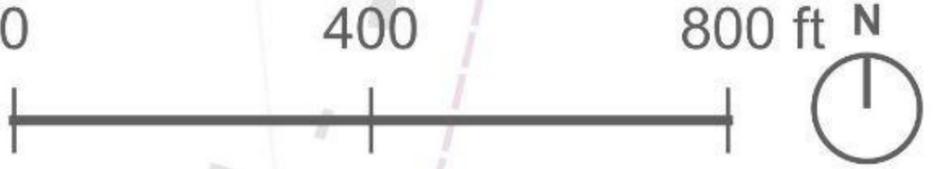
Latest Overall Compliance Map



Belmont Center



- Ⓣ MBTA Stations
- Commuter Rail Routes
- ▭ 0.5-mile Station Area
- SD 1 - Low Density 1
- SD 2 - Low Density 2
- SD 3A - Housing Authority
- SD 3B - Housing Authority
- SD 4 - Mandatory Mixed Use
- SD 5 - High Density



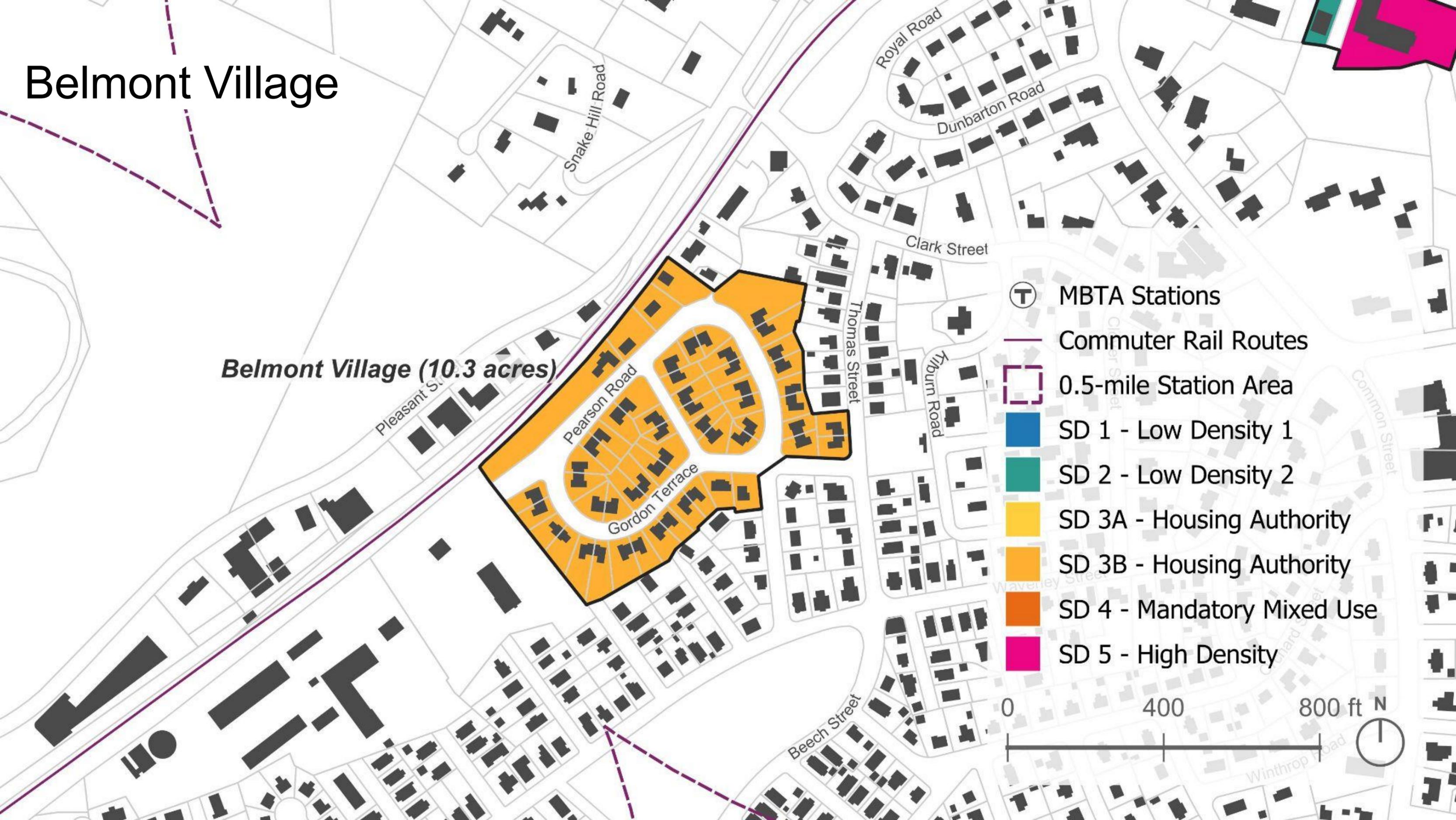
Belmont

Belmont Center (15.8 acres)

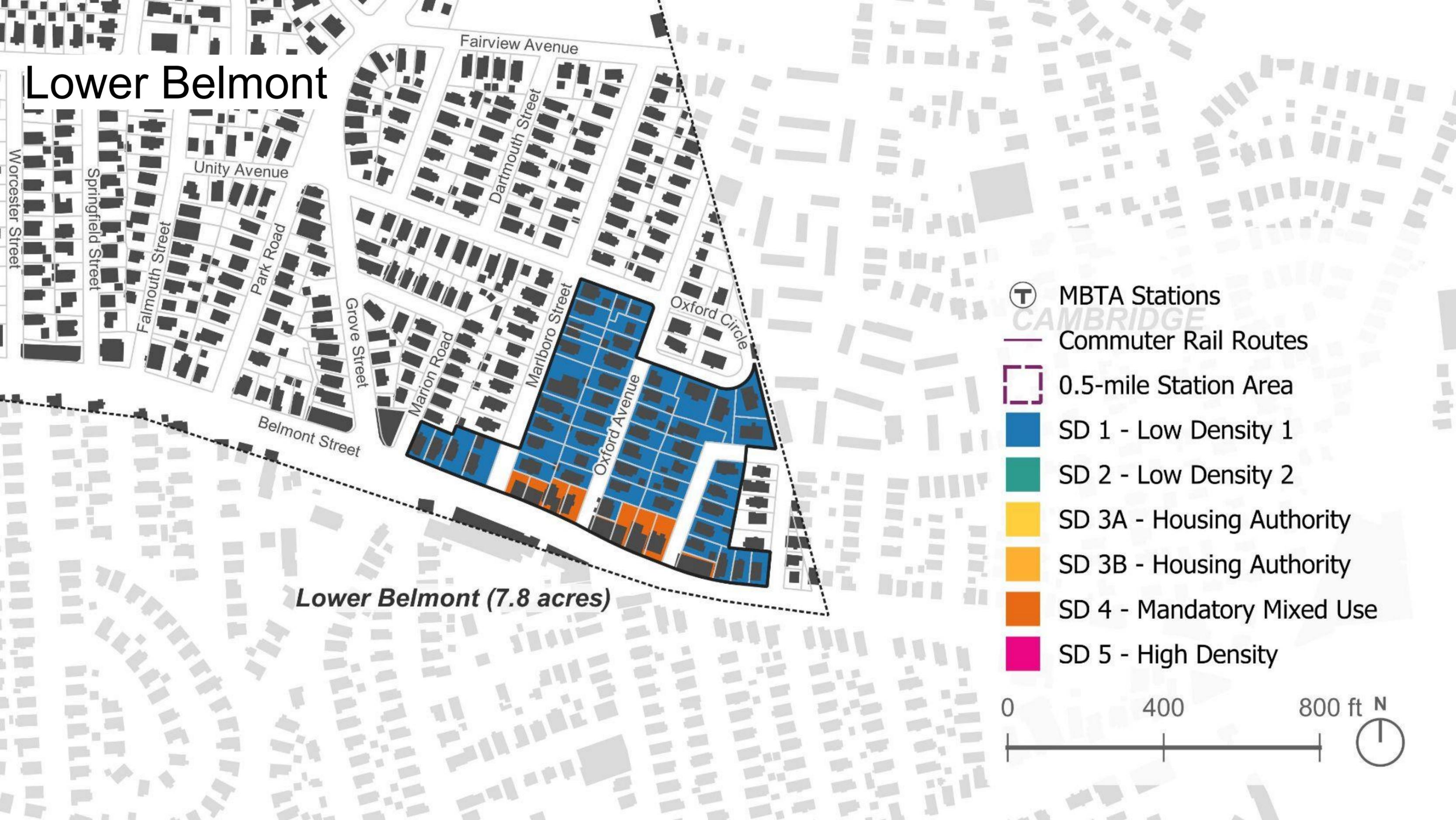
Belmont Village

Belmont Village (10.3 acres)

-  MBTA Stations
-  Commuter Rail Routes
-  0.5-mile Station Area
-  SD 1 - Low Density 1
-  SD 2 - Low Density 2
-  SD 3A - Housing Authority
-  SD 3B - Housing Authority
-  SD 4 - Mandatory Mixed Use
-  SD 5 - High Density



Lower Belmont



Lower Belmont (7.8 acres)

- Ⓣ MBTA Stations
- Commuter Rail Routes
- 0.5-mile Station Area
- SD 1 - Low Density 1
- SD 2 - Low Density 2
- SD 3A - Housing Authority
- SD 3B - Housing Authority
- SD 4 - Mandatory Mixed Use
- SD 5 - High Density



Waverley

Waverley (32.6 acres)

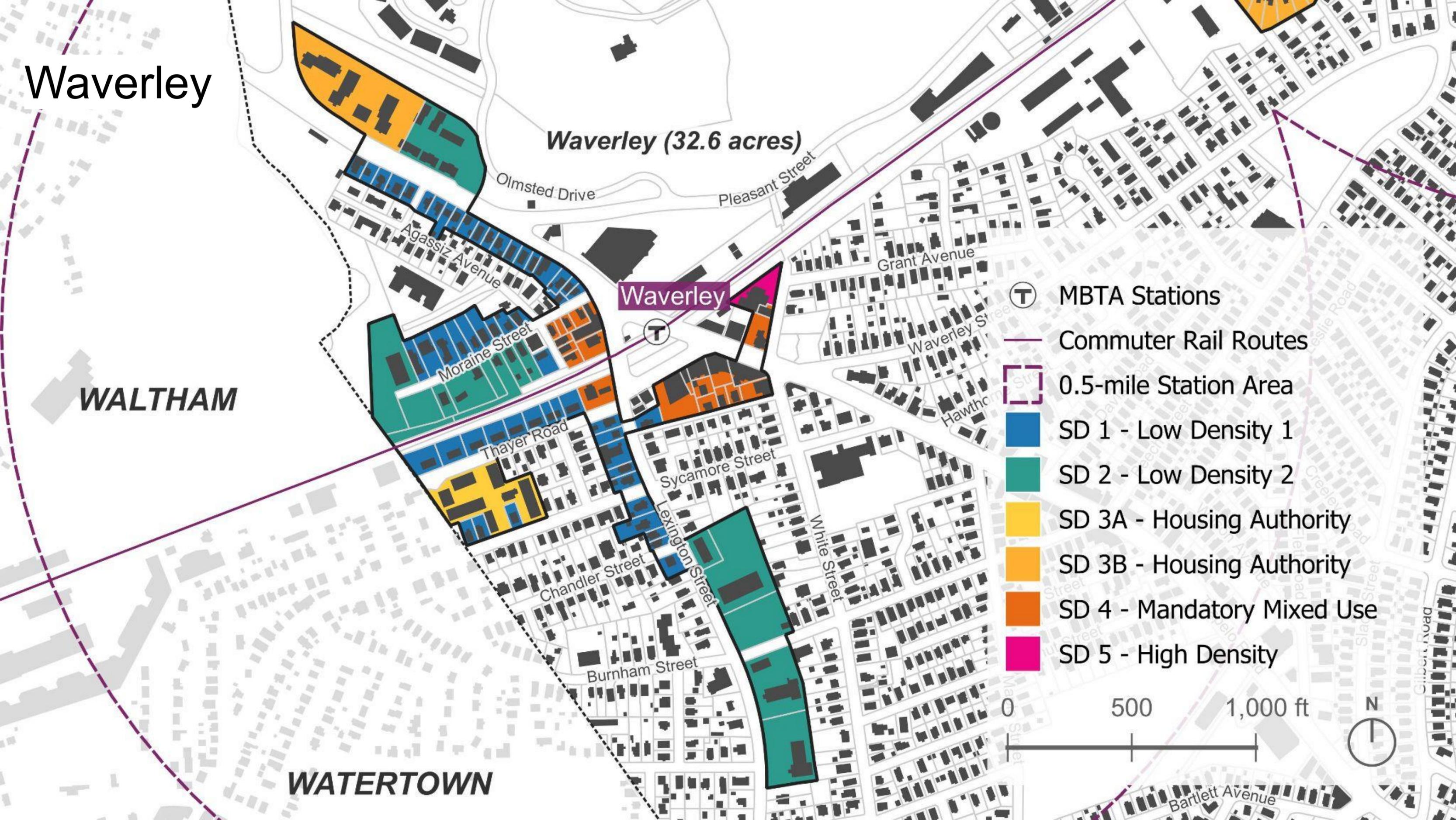
Waverley

WALTHAM

WATERTOWN

- Ⓣ MBTA Stations
- Commuter Rail Routes
- ⬡ 0.5-mile Station Area
- SD 1 - Low Density 1
- SD 2 - Low Density 2
- SD 3A - Housing Authority
- SD 3B - Housing Authority
- SD 4 - Mandatory Mixed Use
- SD 5 - High Density

0 500 1,000 ft



Compliance Check Results

Baseline without unit cap for SD1

District	3A vs. MMU	Max Units per District	Max Units per Lot	Min Lot Size	Max Stories	Model Inputs					Model Outputs
						Min. Open Space	Front Setback (ft)	Side Setbacks (ft)	Rear Setback (ft)	Min. Parking Spaces per Unit	Unit Capacity
SD 1 - Low Density 1	3A	N/A	N/A	2,700 sf	3	30%	10	7.5	15	1	1,004
SD 2 - Low Density 2	3A	N/A	N/A	6,500 sf	2	30%	10	7.5	20	1	384
SD 3A - Housing Authority	3A	135	N/A	N/A	5	30%	10	10	20	0.4	135
SD 3B - Housing Authority	3A	340	N/A	N/A	5	40%	10	10	20	0.4	340
SD 5 - High Density	3A	N/A	N/A	N/A	3	20%	N/A	N/A	15	0.5	125
SD 4 - Mandatory Mixed Use	MMU	N/A	N/A	N/A	2.5	20%	N/A	N/A	15	0.5	386
Total w/o MMU											1,988
Total w/ MMU											Ideally below 2,000 2,374
Does it meet the +10% target?											145%
Compliance Targets											1,632
Compliance Target +10%											1,795
Existing Units											736
Net Increase in Units											Ideally below 1,100 1,638
MMU % check (3A alone must achieve 75% of compliance target)											122%
50% Contiguity Check											49%

Without a unit cap for SD1, the total unit capacity exceeds the desired number by 374 units.

Compliance Check Results

Baseline with unit cap for SD1 of 3 units

District	3A vs. MMU	Max Units per District	Max Units per Lot	Min Lot Size	Max Stories	Min. Open Space	Front Setback (ft)	Side Setbacks (ft)	Rear Setback (ft)	Min. Parking Spaces per Unit	Model Outputs
											Unit Capacity
SD 1 - Low Density 1	3A	N/A	3	2,700 sf	3	30%	10	7.5	15	1	468
SD 2 - Low Density 2	3A	N/A	N/A	6,500 sf	2	30%	10	7.5	20	1	384
SD 3A - Housing Authority	3A	135	N/A	N/A	5	30%	10	10	20	0.4	135
SD 3B - Housing Authority	3A	340	N/A	N/A	5	40%	10	10	20	0.4	340
SD 5 - High Density	3A	N/A	N/A	N/A	3	20%	N/A	N/A	15	0.5	125
SD 4 - Mandatory Mixed Use	MMU	N/A	N/A	N/A	2.5	20%	N/A	N/A	15	0.5	386
Total w/o MMU											1,452
Total w/ MMU											1,838
<i>Does it meet the +10% target?</i>											113%
Compliance Targets											1,632
<i>Compliance Target +10%</i>											1,795
Existing Units											736
Net Increase in Units											1,102
MMU % check (3A alone must achieve 75% of compliance target)											89%
50% Contiguity Check											49%

Ideally below 2,000

Ideally below 1,100

With a unit cap of 3 units for SD1, the total unit capacity and net increase in zoned unit capacity meet the desired ranges.

Compliance Check Results

Baseline with unit cap for SD1 of **4 units (instead of 3 units)**

Benefits of using 4 units as the unit cap for SD1

- Resulting unit capacity stays below 2,000 units
- More attractive than 3 units from market perspective
- Enables two duplexes on the same lot
- If an owner who owns adjacent lots wishes to build more than 4 units, they can still keep the lots as separate. (e.g. building a maximum of 8 units instead of 4 units on two adjoining lots)

Compliance Check Results

Baseline with unit cap for SD1 of 4 units

District	3A vs. MMU	Max Units per District	Max Units per Lot	Min Lot Size	Max Stories	Min. Open Space	Front Setback (ft)	Side Setbacks (ft)	Rear Setback (ft)	Min. Parking Spaces per Unit	Model Outputs
											Unit Capacity
SD 1 - Low Density 1	3A	N/A	4	2,700 sf	3	30%	10	7.5	15	1	618
SD 2 - Low Density 2	3A	N/A	N/A	6,500 sf	2	30%	10	7.5	20	1	384
SD 3A - Housing Authority	3A	135	N/A	N/A	5	40%	10	10	20	0.4	135
SD 3B - Housing Authority	3A	340	N/A	N/A	5	40%	10	10	20	0.4	340
SD 5 - High Density	3A	N/A	N/A	N/A	3	20%	N/A	N/A	15	0.5	125
SD 4 - Mandatory Mixed Use	MMU	N/A	N/A	N/A	2.5	20%	N/A	N/A	15	0.5	386
Total w/o MMU											1,602
Total w/ MMU											1,988
<i>Does it meet the +10% target?</i>											122%
Compliance Targets											1,632
<i>Compliance Target +10%</i>											1,795
Existing Units											736
Net Increase in Units											1,252
MMU % check (3A alone must achieve 75% of compliance target)											98%
50% Contiguity Check											49%

Ideally below 2,000

Ideally below 1,100

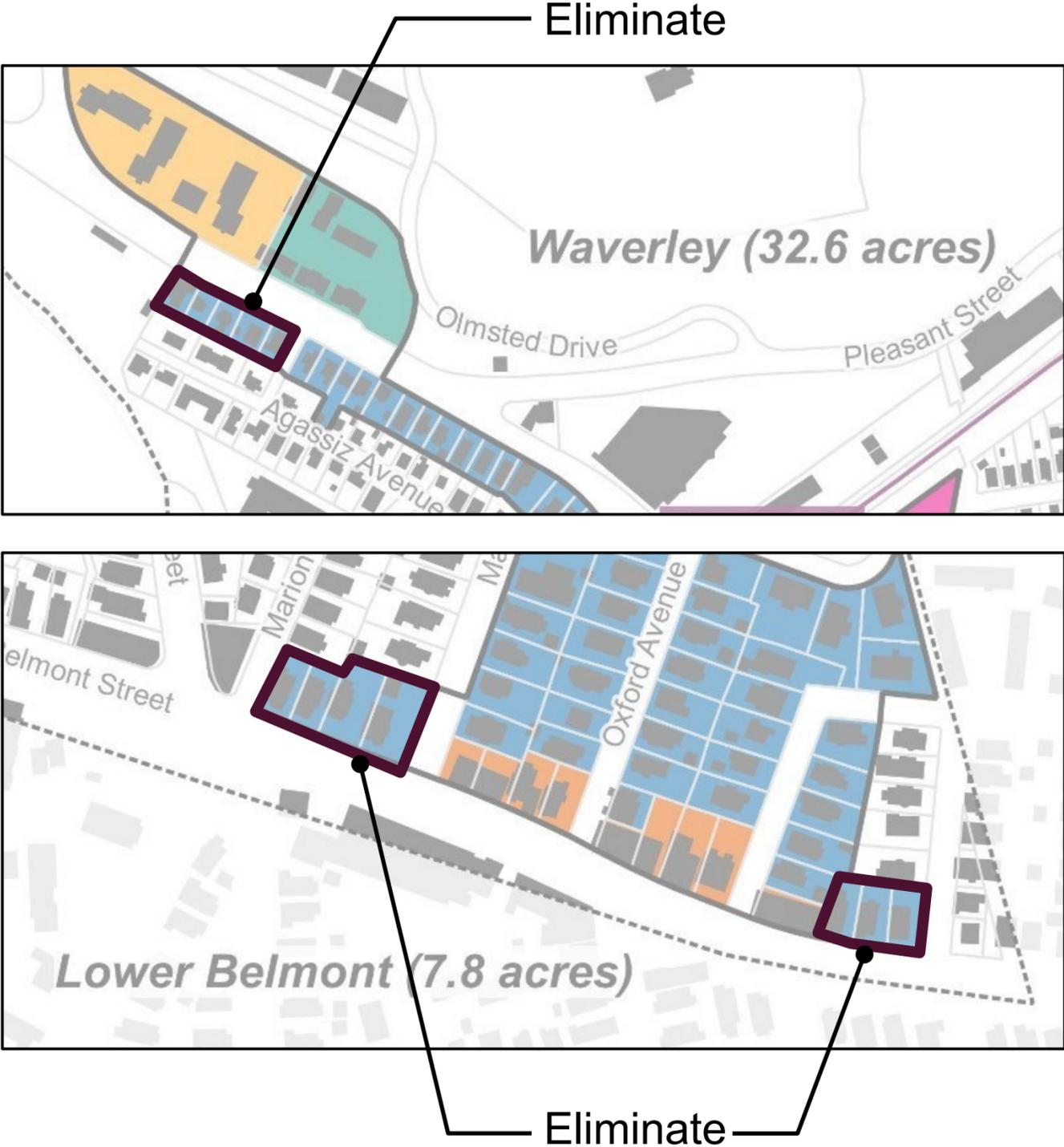
With a unit cap of 4 units for SD1, the total unit capacity and net increase in zoned unit capacity are still within a ballpark of the desired ranges.

Options to further reduce unit capacity

Option 1: Eliminate (12) SD1 Parcels in Lower Belmont and Waverley

- Waverley: Eliminate (5) parcels within westernmost block on Trapelo Road
- Lower Belmont: Eliminate (4) westernmost and (3) easternmost SD1 parcels on Belmont St frontage

Result: unit capacity reduced by 36 units

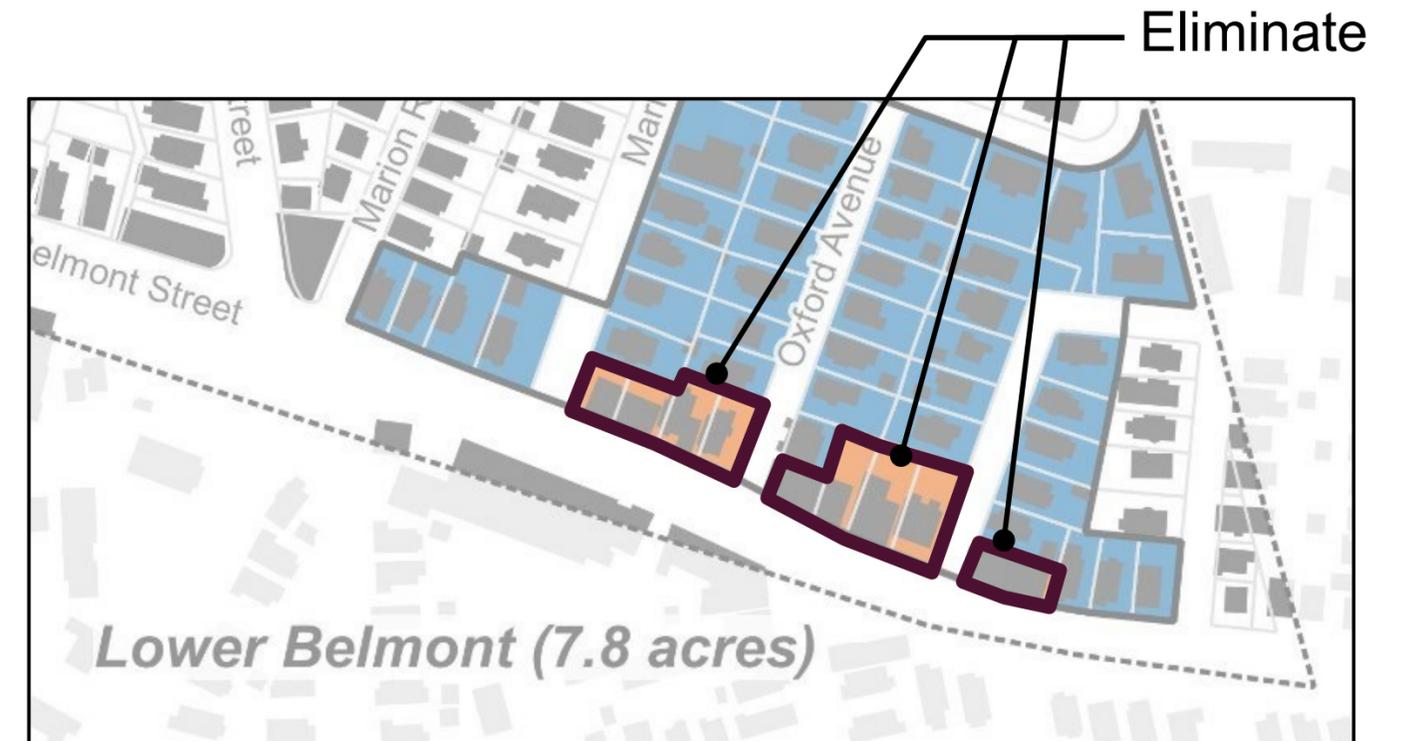


Options to further reduce unit capacity

Option 2: Eliminate (9) SD4 Parcels in Lower Belmont

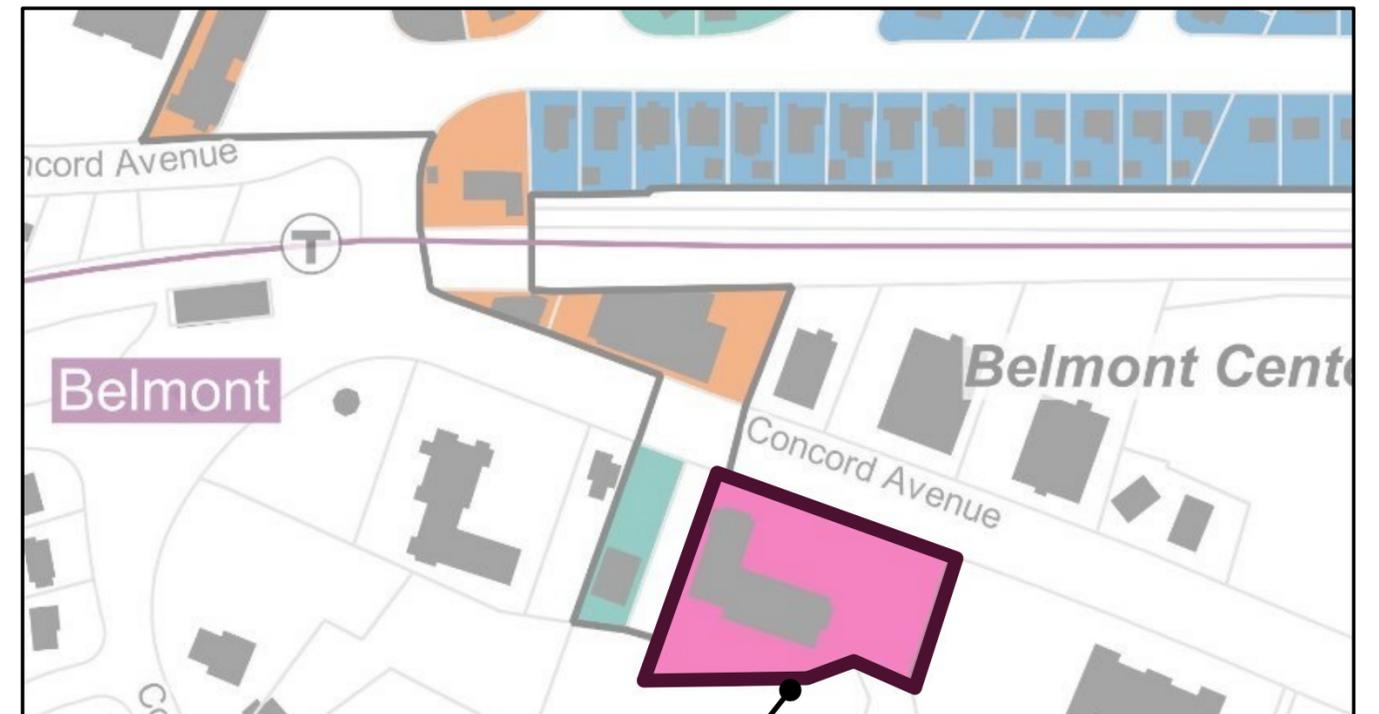
- Lower Belmont: Eliminate (9) SD4 on Belmont St frontage

Result: unit capacity reduced by 50 units



Option 3: Change SD5 Parcel on Concord Ave to SD2

Result: unit capacity reduced by 51 units



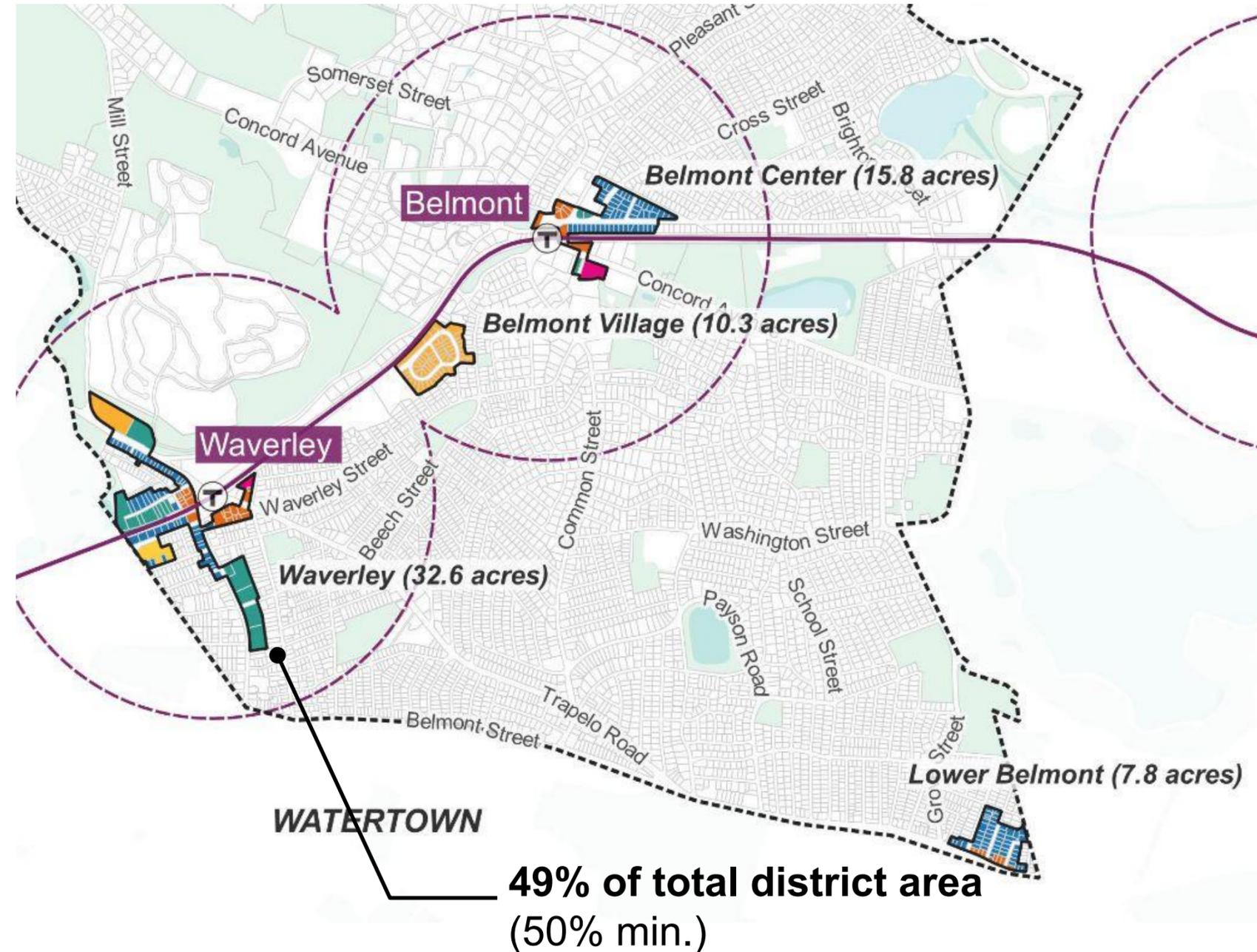
Reduce from SD5 to SD2

50% Sub-area Check

The Waverley subarea currently only constitute 49% of the total district area, so the current baseline map **does not meet compliance**.

Removing parcels from the other sub-areas will enable the Waverley subarea to constitute more than 50% of the total district area in order to meet compliance.

The sub-area acreages indicated in the map are based on GIS measurements and inclusive of ROWs that between parcels.



Summary

- The compliance model is very sensitive to the maximum units per lot parameter for SD1. Setting a unit cap of 3 units for SD1 would result in a reduction in unit capacity by 536 units. The resulting total unit capacity (below 2,000) and net increase in zoned unit capacity (around 1,100) meet the desired ranges provided to Utile.
- A potential middle ground is to set a unit cap of 4 units for SD1.
- Several other options to further reduce unit capacity (irrespective of unit caps for SD1) were tested, totalling a 137-unit reduction if all of them are applied. As instructed, we have not tested eliminating SD3B.
- Minor tweaks to the compliance map will be needed in order to meet the sub-area 50% rule, which requires that a sub-area (a single set of contiguous sub-districts) constitutes at least 50% of the total district area.