

VIA EMAIL ONLY

December 4, 2025

Orsola Susan Fontano, Chair
City of Somerville Board of Appeals (the "Board")
93 Highland Ave
Somerville, MA 02143

RE: 10-12 Liden Street, Zoning Application

Dear Chairperson Fontano and Honorable Members of the Board:

I am writing on behalf of my client, Yang Ge, a resident of Somerville (the "Petitioner"), to request a hardship variance relating to allow Mr. Ge a second curb cut on his existing property, a multi-unit condominium building located at 10-12 Linden Street (the "Relief"). The initiations of a second curb cut triggers a Public Relam variance pursuant to 3.2.18 (ii), which states, "[u]nless otherwise specified, the City Engineer may not permit more than one (1) curb cut per front lot line of a lot."

The Petitioner was unaware that the property he purchased did not allow for parking on his side of the property. As you can see from the attached photograph, Exhibit A, the current ground cover surrounding the property is a permeable hardscape and makes no distinction (surface-wise) from the curb-cut side on the left, to the non-curb cut side on the right, where the Petitioner now seeks the Relief. In other words, the Petitioner believed that he was purchasing a condominium unit, that, like the abutting unit, had access to parking along the side of his building. Other than the absence of a curb cut, the appearance of the hardscape area to the right of the building appears very much to be a driveway and is almost identical in size to the existing driveway on the left. These circumstances may serve as criteria that the Board may use to consider the granting of Hardship Variance, namely, "[l]iteral enforcement of the provision of this Ordinance for the district where the subject land or structure is located would involve substantial hardship, financial or otherwise, to the petitioner or appellant due to said special circumstances." (Emphasis supplied).

Moreover, the current property is a double-lot, approximately twice the frontage of other nearby lots. The above referenced language of the zoning ordinance, as well as the definition of the word "lot" does not explicitly call out situations such as this double lot. However, the presence of this double-lot condition, provide further criteria that the Board may use to justify the granting of this Hardship Variance, namely, that, "[s]pecial circumstances exist relating to the soil conditions, shape, or topography of a parcel of land or the unusual character of an existing structure but not affecting generally the zoning district in which the land or structure is located." (Emphasis supplied).

The Petitioner provides a letter of support from his condominium board, which states in relevant board that the proposed curb-cut "will benefit the property and does not conflict with the interest of the condominium or its residents." A copy of the letter is attached as Exhibit B. This support from the immediate abutters serves to provide yet another criteria that the Board may consider in the granting of this Hardship Variance, namely, that "[d]esirable relief could be granted without causing substantial detriment to the public good and without nullifying or substantially derogating from the intent and purpose of a specific district in this Ordinance or the Ordinance in general."

Therefore, based on the above, the Petitioner respectfully requests that the Board find the necessary criteria exists to determine that the second curb-cut would be appropriate in this particular instance, through the granting of a Hardship Variance. I respectfully request that this matter be placed before the Board for their consideration at the next available meeting. Thank you.

Very Truly Yours,

A handwritten signature in black ink, appearing to read 'M. Ross', with a long horizontal flourish extending to the right.

Michael P. Ross
617 456 8149 direct
mross@princelobel.com

EXHIBT A



EXHIBT B

Linden Street Condominium Trust

12 Linden St
Somerville, MA 02143

Re: Support for Special Permit – Curb Cut Request at 12 Linden St, Somerville

To Whom It May Concern,

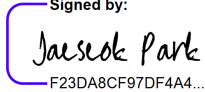
We, the undersigned representatives of the 10-12 Linden Street Trust located at 12 Linden St, Somerville, are writing to confirm that the Association has reviewed and **approved the request by Yang Ge, the owner of Unit 10, to proceed with a curb cut at the property.**


After discussion and review, the Association agrees that the proposed curb cut will benefit the property and does not conflict with the interests of the condominium or its residents. We therefore support Yang Ge's application to the City of Somerville for the required special permit to complete this work.

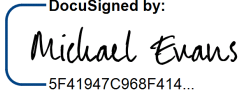
Should you have any questions or require further confirmation, please do not hesitate to contact us at lindenstreettrust@gmail.com.

Sincerely,

Signature 
Signed by: Benjamin Honig-Stern
D1992CB3E4B849E...
Printed Name: Benjamin Honig-Stern
Unit 6

Signature 
Signed by: Jaeseok Park
F23DA8CF97DF4A4...
Printed Name: Jaeseok Park
Unit 8

Signature 
Printed Name: Yang Ge
Unit 10

Signature 
DocuSigned by: Michael Evans
5F41947C968F414...
Printed Name: Michael Evans
Unit 12

Trustees
10-12 Linden Street Trust