### Housing New York



### **Process for Establishing and Applying MIH**



#### **Zoning Text Amendments to Establish the MIH Program**

Public review concurrent with Zoning for Quality and Affordability proposal

#### **Application of Mandatory Affordable Housing in Neighborhoods**

- For public and private applications to the City Planning Commission that encourage substantial new housing – each with <u>its own full public review</u>
  - City-initiated rezonings e.g., East New York
  - Private applications for zoning map changes
  - Private applications for special permits that create substantial new residential density



### The Affordable Housing Crisis

Gap Between Rents and Incomes

Over the past decade, average rents rose by more than 10% while wages stagnated

High Rent Burden

55% of renter households are "rent-burdened" and 30% are "extremely rent burdened"

Insufficient Housing Production

The marketplace is not meeting the needs of existing residents, let alone new ones

Limited Supply of Affordable Units

Despite significant public investment, only a fraction of eligible New Yorkers served

Population Growth

230,000 new residents arrived since 2010 and 600,000 more are expected by 2040

### Housing New York

A Five-Borough, Ten-Year Plan

**Housing New York** is a plan to build and preserve 200,000 affordable homes over the next decade, with a range of incomes from the very lowest, to those in the middle class.



# Housing New York: Implementation

## **Create More Affordable Housing**

- Create 80,000 new affordable units
- Reform 421-a tax exemption program
- Improve zoning to promote affordability

# Preserve Existing Housing and Prevent Displacement

- Preserve affordability of 120,000 existing units
- Strengthen rent regulations
- Protect tenants facing harassment

Plan for and Invest in Strong Neighborhoods

- Collaboratively plan with communities
- Create Neighborhood Development Fund
- Align planning with strategic investments



### Housing New York:

1) Mandatory Inclusionary Housing



### What is Mandatory Inclusionary Housing?

A new proposal to use zoning to require permanently affordable housing when future City Planning Commission actions encourage substantial new housing

25-30% must be affordable



### **Goals of Mandatory Inclusionary Housing**

- Equity: Promote vibrant, diverse neighborhoods
- Planning: Ensure affordable housing in areas in which we are planning for growth
- Local Needs: Meet the needs of a range of low-and moderate-income New Yorkers
- Legal: Ensure that program meets legal standards
  - Apply program consistently
  - Support financial feasibility of housing creation



### Why are we proposing a 25-30% requirement?

- There is a tradeoff between
  - a) amount of affordable housing and
  - b) price of affordable housing
- Strong housing markets can support a requirement for 20-30% affordable housing without subsidies
- Middle markets need public subsidy to get 20-30%, unless moderate incomes are targeted
- In weak markets, direct public subsidy is always needed
- What about a higher requirement?
   A 50% requirement is not financially feasible

#### Proposed Requirements Would Be The Most Rigorous of Any Major U.S. City

For each rezoning, the City Planning Commission and City Council can apply:

Option 1: 25 percent of housing at an average of 60% AMI

Option 2: 30 percent of housing at an average of 80% AMI

Plus, in limited emerging or midmarket areas, an additional option may be added:

Workforce option: 30 percent at an average of 120% AMI (without direct subsidy)

Not available in Manhattan CDs 1-8

AMI	Income*	Sample Occupation	Affordable Monthly Rent for 2BR*	
40%	\$31,080	Security Guard	\$775	
60%	\$46,620	Paramedic	\$1,150	
80%	\$62,150	School bus driver + home health aide	\$1,550	
100%	\$77,700	Teacher + retail salesperson	\$1,950	
120%	\$93,240	Firefighter + server	\$2,350	

<sup>\*</sup> For a 3-person home



#### **Key Features of Proposed Program**

#### **Other requirements**

- Required units would be new, <u>permanently</u> affordable units
- Applies to developments, enlargements, or conversions > 10 units

#### Locations of affordable units

- On-site, same building as market-rate units, spread on at least half of the building's stories, with a common street entrance and lobby
- On-site, separate building, completely independent from the ground to the sky; would not stigmatize residents of affordable units
- Off-site, different zoning lot located within the same Community District or within ½ mile

#### Other considerations

- Payment-in-lieu option for buildings of between 11 and 25 units
- Requirements could be reduced or waived through BSA where they would make development infeasible (legal requirement for hardship relief)

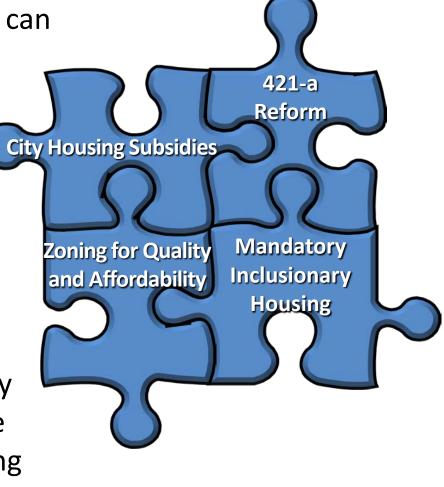


#### MIH Is One of Many Tools That Work Together

 With additional public subsidy, we can reach incomes as low as 30% AMI

Reform of State 421-a tax
 exemption program will require
 affordable housing in every rental
 building receiving benefits

- More affordable housing
- Broader range of incomes
- No benefits for luxury condos
- Zoning for Quality and Affordability
   will promote senior and affordable
   housing, aid efficient use of housing
   subsidies and promote better buildings





### Housing New York:



### Goals

#### **Affordability**

Make zoning work better with financial and other programs to create more affordable housing for a wider range of New Yorkers

### Quality

Encourage better buildings that contribute to <a href="https://example.com/attractive and livable">attractive and livable</a> <a href="mailto:neighborhoods">neighborhoods</a>



### **Affordability**

- Help seniors remain in their communities by making it easier to provide affordable senior housing and care facilities
- Support the creation of Inclusionary Housing
- Free up resources to create more affordable housing by enabling cost-effective, transit-accessible affordable housing

### **Affordability**

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### Why Does Zoning Need to Change?

- Population 65 years and older is projected to increase 40% by 2040 – over 400,000 additional seniors
- Dated zoning does not recognize today's spectrum of senior housing and care facilities, such as
  - o independent living
  - o assisted living
  - o nursing care
- In medium and higher density districts: affordable senior housing is allowed more floor area, but zoning doesn't allow room for it all to fit in a well designed building
- In <u>lower density multifamily districts</u>: zoning is based on walkup houses, but **seniors need elevator buildings**



### **Key Elements of the Proposal**

**Goal:** Help seniors remain in their communities

- Update regulations to allow a spectrum of affordable senior housing and care facilities, alone or mixed
  - Affordable Independent Residences for Seniors (AIRS)
  - Long-term Care Facilities
    - As-of-right in most residence districts
    - By discretionary action in R1 and R2 districts
- Allow flexibility for mixing of uses
  - Align as-of-right floor areas in districts that permit multiple dwellings

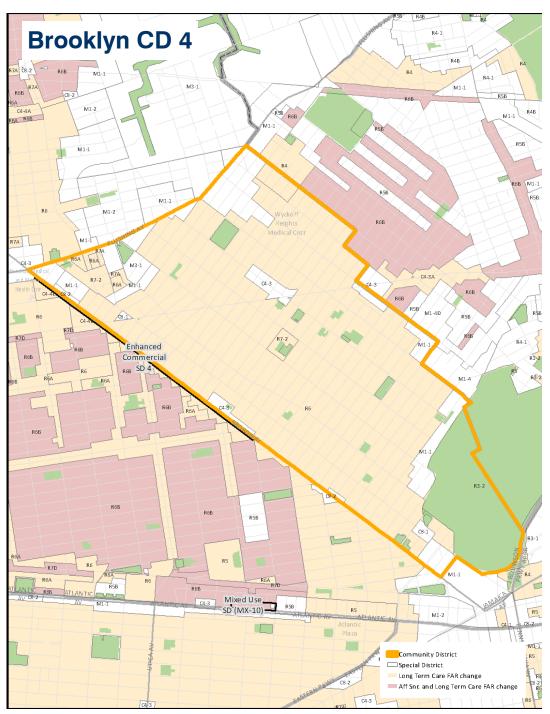


### Affordable Senior Housing and Long Term Care Floor Area

 Floor area ratio maximums would be updated for certain types of affordable senior housing and long term care facilities in the districts shaded on the map.

PR	O	P	0	S	E	D
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				PROPUSED
Res. Equiv.	Zoning District		Existing Nursing Home and Health Related Facilities (FAR)	Aff. Ind. Residences for Seniors and Long Term Care (FAR)
R3	R3-2	0.95	0.5	0.95
R4	R4	1.29	0.75	1.29
R6	C4-3	3.9	2.43	3.9
	R6	3.9	2.43	3.9
R6A	R6A	3.9	3	3.9
R6B	R6B	2	2	2.2
R7	R7-2	5.01	3.44	5.01
R7A	R7A	5.01	4	5.01





### **Key Elements of the Proposal**

**Goal:** Help seniors remain in their communities

#### Update height and setback regulations

In medium- and high-density districts:

Allow limited additional height in contextual envelope

#### In lower-density multifamily districts:

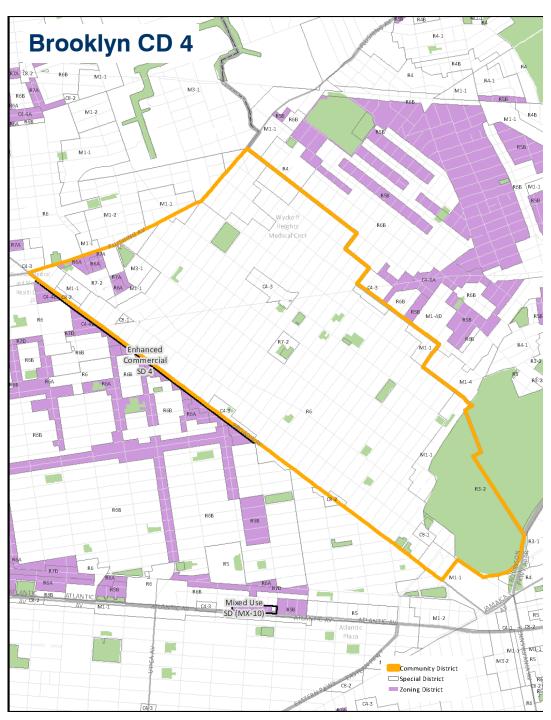
- Accommodate an apartment building with an elevator
- Retain existing discretionary actions to allow additional flexibility where needed



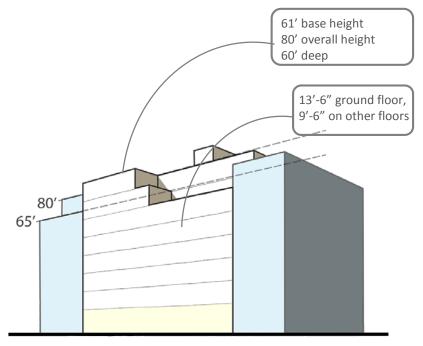
# Affordable Senior Housing and Long Term Care: Contextual districts

 To fit permitted floor area, maximum heights would be updated in the contextual districts shaded on the map.

			Senior		
			Modifications		
			AIRS and AIRS and		
		Existing	LTCF	LTCF	
		Height	Proposed	Height	
Res. Equiv.	<b>Zoning District</b>	(stories)	(Stories)	Difference	
R6A	R6A	75' (7)	85' (8)	10' (1)	
R7A	R7A	85' (8)	105' (10)	20' (2)	

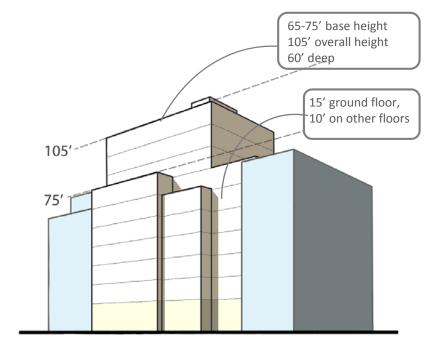


# How Much Additional Height Is Needed for Affordable Senior Housing and Care Facilities?



Existing R7A envelope on narrow street, interior lot

**Existing** 



Proposed R7A envelope on narrow street, interior lot

**Proposed** 

Medium- and high-density districts: In over 95% of affected areas, no more than 1 or 2 additional stories



### **Affordability**

- Help seniors remain in their communities by making it easier to provide affordable senior housing and care facilities
- Support the creation of Inclusionary Housing
- Free up resources to create more affordable housing by enabling cost-effective, transit-accessible affordable housing

### Why Does Zoning Need to Change?

 In designated medium and higher density areas, the Inclusionary Housing program promotes mixed-income housing

 Inclusionary Housing is allowed more floor area, but zoning doesn't allow room for it all to fit in a well designed building

The result: less affordable housing

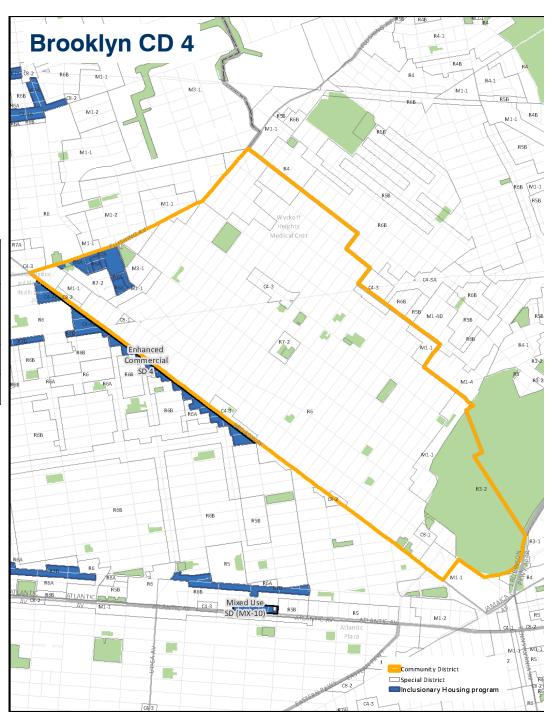


### **Inclusionary Housing Areas:** Proposed height changes

 In order to fit permitted floor area without sacrificing quality, maximum heights would be updated in the shaded Inclusionary Housing Areas.

Inclusionary
Modifications

	Modifications			
Res. Equiv.	Zoning District	Existing Base Height (stories)		IH Height Difference
R6A	R6A	75' (7)	85' (8)	10' (1)
R7A	R7A	85' (8)	105' (10)	20' (2)





### **Affordability**

- Help seniors remain in their communities by making it easier to provide affordable senior housing and care facilities
- Support the creation of Inclusionary Housing
- Free up resources to create more affordable housing by enabling cost-effective, transit-accessible affordable housing

### Why Does Zoning Need to Change?

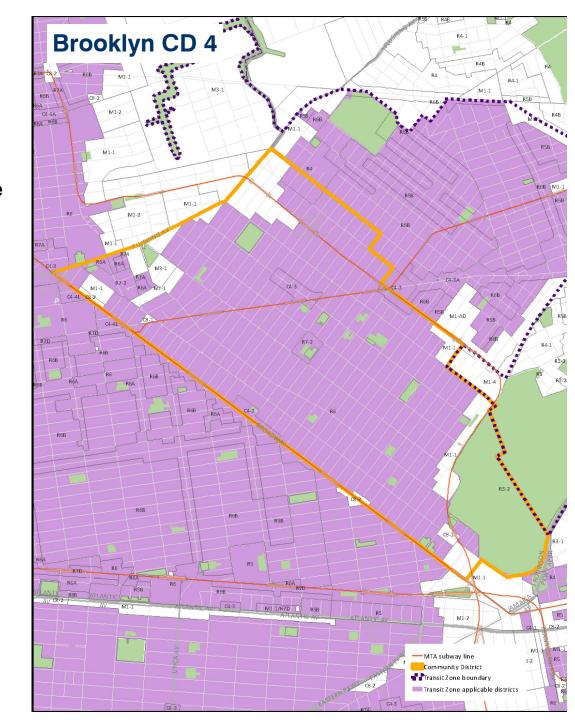
### Current parking requirements make it harder to meet the need for affordable housing

- Off-street parking can cost as much as \$30,000-\$50,000 per parking space to provide
- Residents of affordable housing cannot pay the fees necessary to support this cost (approx. \$200-300+/month)
- Lower-income households own fewer cars, especially in transit-served areas – and low-income seniors own extremely few
- Operators report that low-income residents rarely park in these facilities



### <u>Transit Zone:</u> Off-street parking requirements

- All of Brooklyn CD4 is located in the proposed Transit Zone.
- To encourage senior and affordable housing, parking requirements would be eliminated for new affordable and senior units in the Transit Zone shaded on the map.
- Outside the Transit Zone, parking requirements for new senior and affordable housing will be simplified and in some case reduced.



### Quality

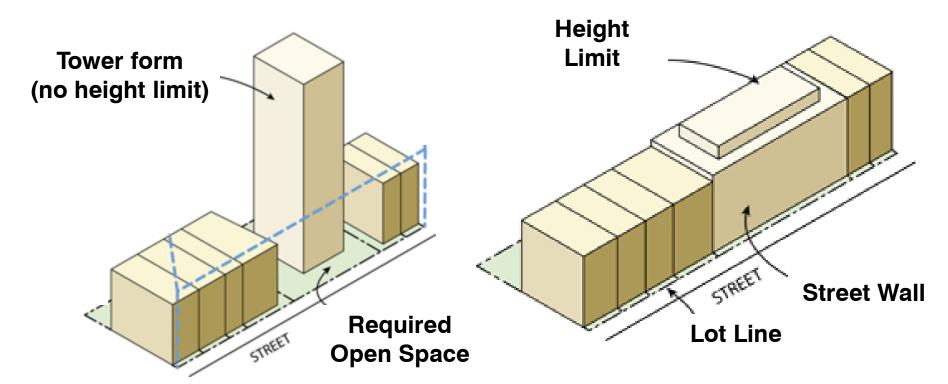
- Encourage better ground-floor retail and residential spaces and apartments with adequate ceiling heights
- Change rules that lead to flat, dull apartment buildings to encourage visual variety and features common in traditional apartment buildings
- Maintain rules that work well today, including the essential rules of "contextual" zoning districts and lower-density zoning districts



### "Height Factor" vs. "Contextual"

Height Factor Zoning (e.g. R6)

Contextual Zoning (e.g. R6A; also Quality Housing)

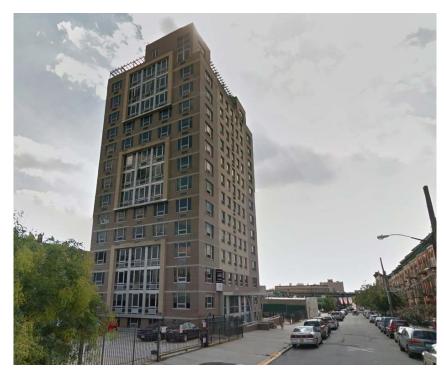




### "Height Factor" vs. "Contextual"

Height Factor Zoning (R6 Height Factor)

**Contextual Zoning** (R6 Quality Housing)



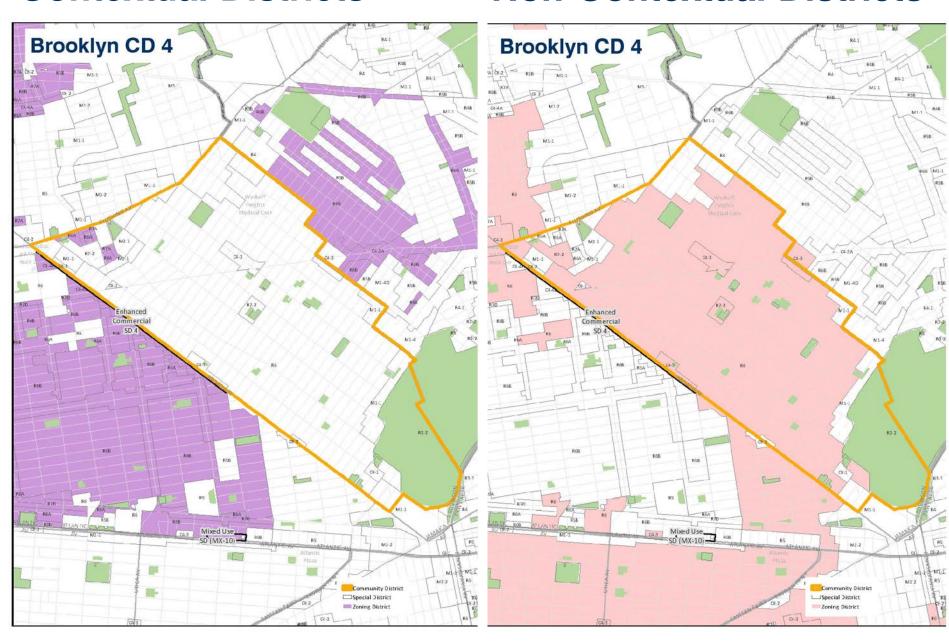




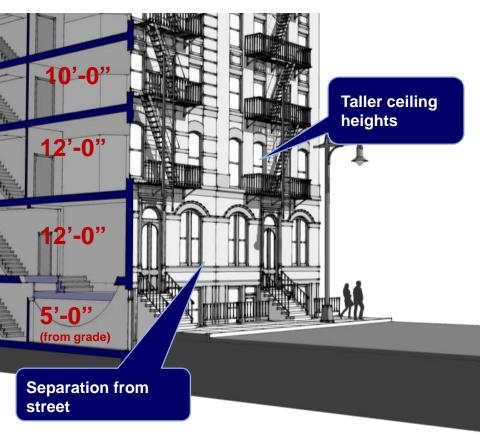
424 Melrose Street

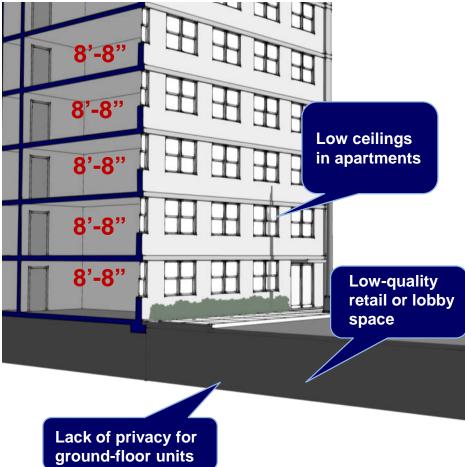
#### **Contextual Districts**

#### **Non-Contextual Districts**



# 1987 controls increase costs and can lead to housing that doesn't match its context

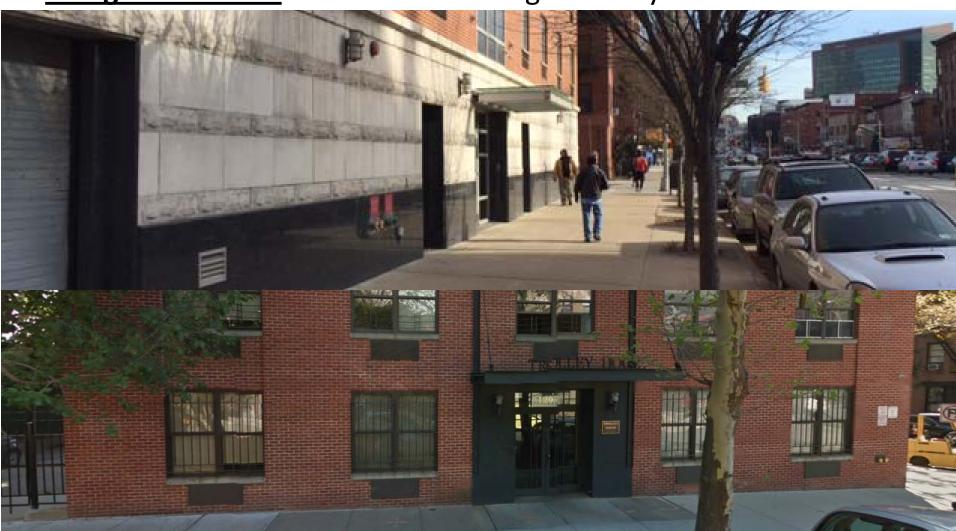






### Why Does Zoning Need to Change?

Bad ground floors in medium- and high-density contextual districts







### Why Does Zoning Need to Change?

Flat, dull buildings in medium- and high-density contextual districts







### **Key Elements of the Proposal**

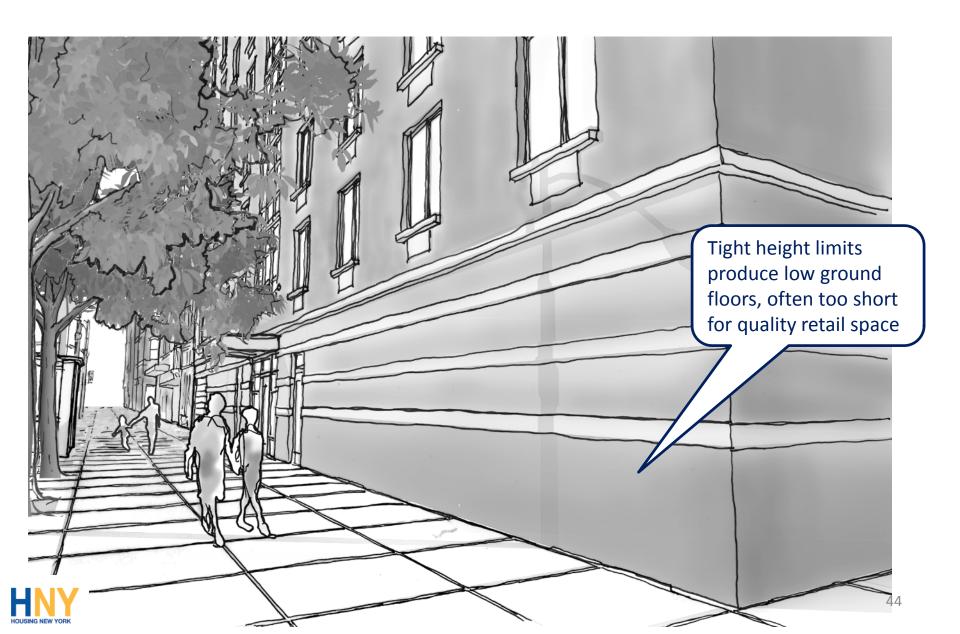
Goal: Encourage better ground-floor retail and residential spaces and apartments with adequate ceiling heights

#### In medium- and high-density contextual districts:

- Allow limited additional height if buildings provide taller ground floors
  - o No more than **five feet**, in over 95% of affected areas



#### **Current Rules - Commercial street**



### With Proposal – Commercial street





### **Key Elements of the Proposal**

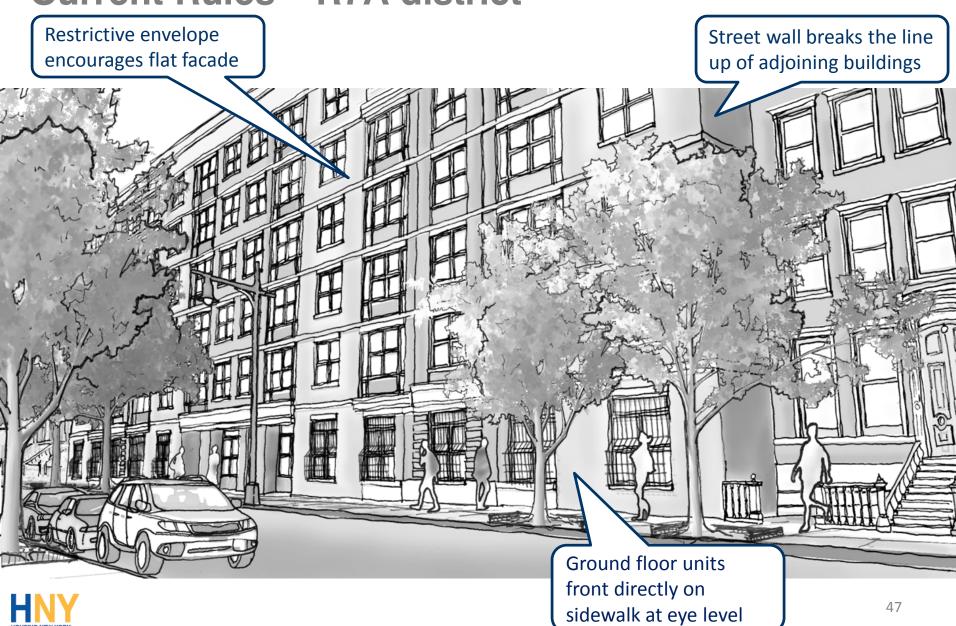
Goal: Change rules that lead to flat, dull apartment buildings to encourage visual variety and features common in traditional apartment buildings

- Increase Setbacks to provide garden areas in front of buildings
- Façade articulation: Allow more flexibility for
  - courtyards
  - bay windows
  - better interior layouts



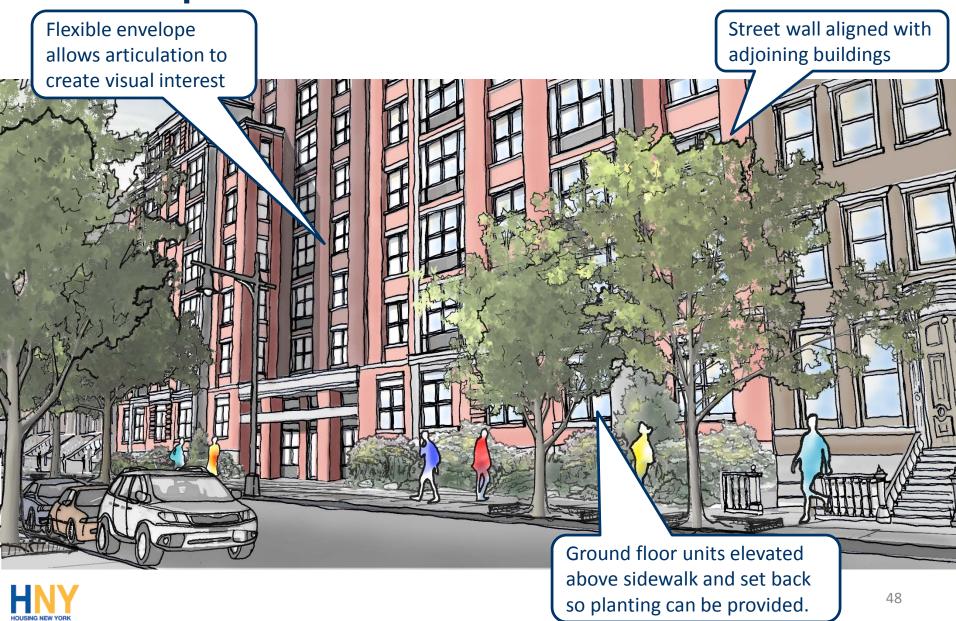
#### **PROPOSAL**

#### **Current Rules – R7A district**



#### **PROPOSAL**

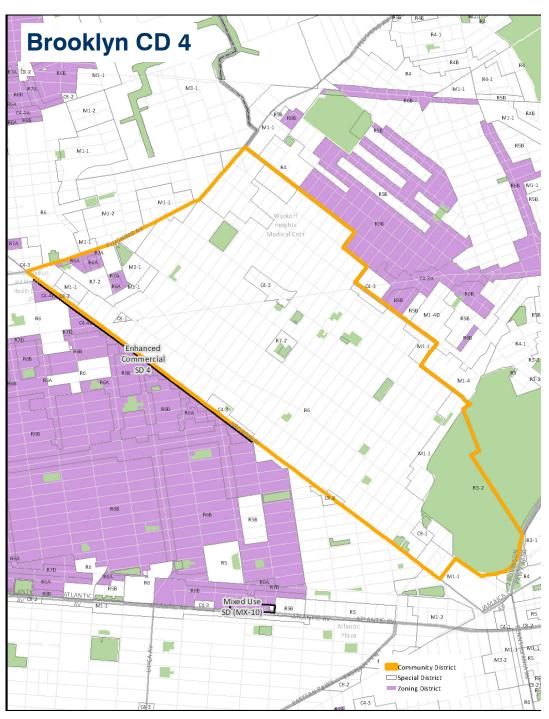
#### With Proposal – R7A district



## **Contextual Districts: Basic Residential changes**

 In order to fit all permitted floor area and allow better design, maximum heights would be updated in the contextual districts shaded on the map.

			Ba	isic	
			Modifications		
	Zoning	Existing	Basic Proposed	Basic Height	
Res. Equiv.	District	Max Height	•	Difference	
R6A	R6A	70'	75' (7)	5′	
R6B	R6B	50′	55' (5)	5′	
R7A	R7A	80′	85' (8)	5′	



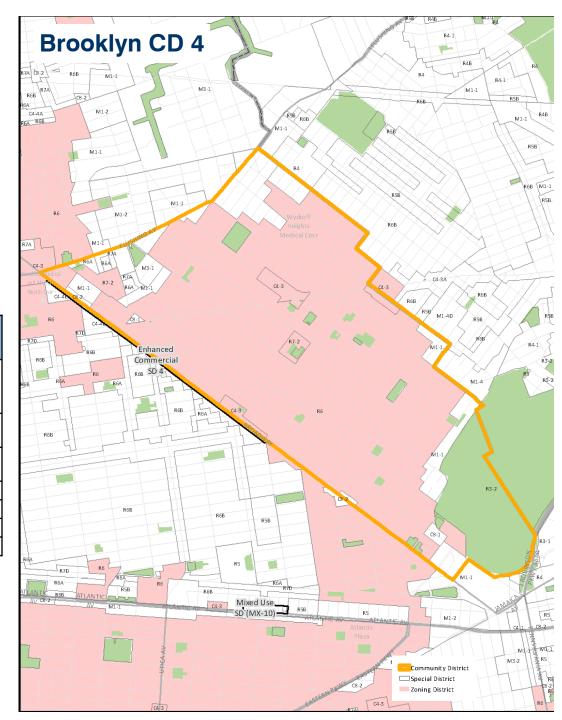
## **Non-Contextual Districts: Basic Residential changes**

- In Non-Contextual Districts, buildings have a "Quality Housing option" similar to the Contextual envelope.
- In order to match the Contextual envelope, the Quality Housing option will be updated in the shaded districts.

			basic ke	sidentiai
			Modifications	
Res. Equiv.	Zoning District	Existing Max Height	Basic Proposed (Stories)	Basic Height Difference
R6 (narrow)	C4-3	55'	55' (5)	0'
	R6	55′	55' (5)	0'
R6 (wide)	C4-3	70'	75' (7)	5'
	R6	70′	75' (7)	5'
R7-2 (narrow)	R7-2	75'	75' (7)	0'
R7-2 (wide)	R7-2	80'	85' (8)	5'

<sup>\*</sup> In addition, developments in R6 through R10 districts could use the applicable Quality Housing option envelope.







## What Changes Have Been Made Since the Proposal was First Announced?

To focus more squarely on the core goals of quality and affordability:

- Reduction in the additional height initially proposed for buildings in R7A districts
- Making the additional extra 5 feet of height available only to buildings providing taller ground floors

#### To ensure a transparent public process:

- Extended comment period on environmental scope
- Draft zoning text and "Community Profiles" on DCP website
- CB info sessions conducted before public review, with CB review period occurring after the summer recess



#### **Public Review Process**



Public land use review process (approx. 6 months)

#### Zoning Text Amendments to Establish both ZQA and the MIH Program

Public reviews of both proposals are concurrent, asking for input now

#### **Application of MIH in Neighborhoods**

- For public and private zoning changes that allow new housing, each has its own full public review
  - City-initiated rezonings e.g., East New York
  - Private applications for zoning map changes
  - Private applications for special permits that create substantial new residential density



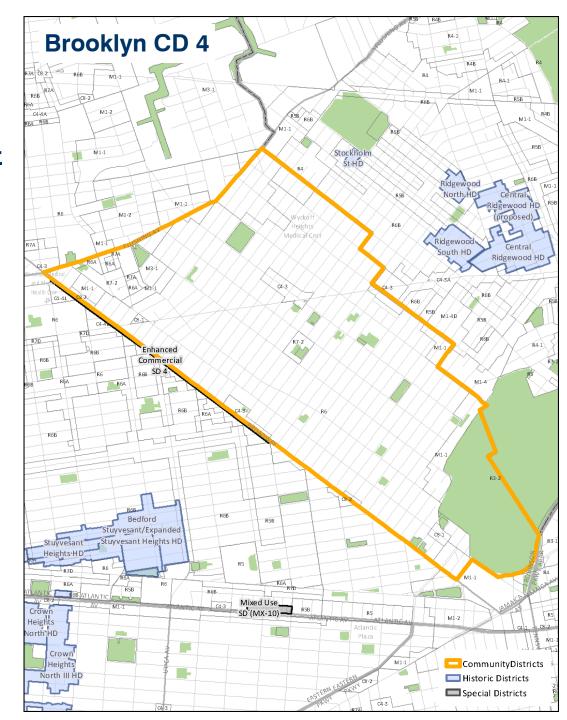
For complete information, including Community
District profiles showing which parts of the proposal
would apply in individual areas,
visit DCP's website:

nyc.gov/planning

## <u>Purpose</u>: To promote affordable housing and foster diverse, livable neighborhoods

#### **Applicability in Brooklyn CD 4**

- Basic Residential Height Changes
  - Contextual
  - Non-Contextual
- Inclusionary Housing Height Changes
- Senior Housing FAR and Height Changes
  - Contextual
  - Non-Contextual
- Parking Changes
  - Transit Zone
- Other reference maps



### What the Proposal Would Not do:

- No additional market-rate floor area
- No provisions that encourage tear-downs
- No elimination of any contextual zoning district, or re-mapping of any zoning district
- All projects in historic districts or landmarked buildings remain subject to review by the Landmarks Preservation Commission
- No change to as-of-right residential rules in 1- and 2-family districts
- No reduction in the amount of green or open spaces required for buildings
- Proposal would not produce dramatic changes in development in any neighborhood





### **Basic Height Limit Changes**

Basic Modifications (Assuming a
Qualifying Ground Floor)

Zoning District	Existing Maximum	Proposed	Height
	Building Height	Height (stories)	Difference
R5D	40'	45' (4)	5'
R6B	50'	55' (5)	5'
R6A	70'	75' (7)	5'
R7B	75'	75' (7)	0'
R7A	80'	85' (8)	5'
R7D	100'	105' (10)	5'
R7X	125'	125' (12)	0'
R8B	75'	75' (7)	0'
R8A	120'	125' (12)	5'
R8X	150'	155' (15)	5'
R9A (narrow street)	135'	145' (14)	10'
R9A (wide street)	145'	155' (15)	10'
R9X	160'	175' (17)	15'
R10A (narrow street)	185'	195' (19)	10'
R10A (wide)	210'	215' (21)	5'

### Height Limit Changes for Affordable Housing

## Inclusionary and Affordable Senior Housing Modifications(Assuming a Qualifying Ground Floor)

Zoning District	Basic Modifications (stories)	Proposed Height (stories)	Height Difference (stories)
R6B	55' (5)	55' (5)	0' (0)
R6A	75' (7)	85' (8)	10' (1)
R7B	75' (7)	75' (7)	0' (0)
R7A	85' (8)	105' (10)	20' (2)
R7D	105' (10)	125' (12)	20' (2)
R7X	125' (12)	145' (14)	20' (2)
R8B	75' (7)	75' (7)	0' (0)
R8A	125' (12)	145' (14)	20' (2)
R8X	155' (15)	175' (17)	20' (2)
R9A (narrow street)	145' (14)	175' (17)	30' (3)
R9A (wide street)	155' (15)	175' (17)	20' (2)
R9X	175' (17)	205' (20)	30' (3)
R10A (narrow street)	195' (19)	235' (23)	40' (4)
R10A (wide)	215' (21)	235' (23)	20' (2)

#### Basic Residential Height Changes - Non-Contextual Districts using QH option

Basic Resid	ential Modifications (A	ssuming a	
Q	Qualifying Ground Floor)		

Zoning District	Existing	Proposed (stories)	Contextual District equivalent	Height Difference
R6 narrow street	55′	55' (5)	R6B	0′
R6 wide street (outside MN Core)	70′	75' (7)	R6A	5′
R6 wide street (inside MN Core)	65'	65' (6)	N/A	0′
R7 narrow street	75′	75' (7)	R7B	0′
R7 wide street (outside MN Core)	80′	85' (8)	R7A	5′
R7 wide street (inside MN Core)	75′	75' (7)	N/A	0′
R8 narrow street	105′	125' (12)	R8A	20′
R8 wide street (outside MN Core)	120′	145' (14)	N/A	25′
R8 wide street (inside MN Core)	120′	125' (12)	R8A	5′
R9 (narrow street)	135′	145' (14)	R9A (narrow street)	10'
R9 (wide street)	145'	155' (15)	R9A (wide street)	10'
R10 (narrow street)	185'	195' (19)	R10A (narrow street)	10'
R10 (wide street)	210′	215' (21)	R10 wide street)	5′

## Enhanced IZ and Senior Housing Heights – Non-Contextual Districts using QH option

		Basic Residential	
		Modifications(Assuming a	
		Qualifying Gr	ound Floor)
Zoning District	Basic	Proposed	Height
	Modifications	(stories)	Difference
	(stories)		(stories)
R6 narrow street	55' (5)	55' (6)	0' (0)
R6 wide street (outside MN Core)	75' (7)	85' (8)	10' (1)
R6 wide street (inside MN Core)	65' (6)	65' (6)	0' (0)
R7 narrow street	75' (7)	85' (8)	10' (1)
R7 wide street (outside MN Core)	85' (8)	105' (8)	20' (2)
R7 wide street (inside MN Core)	75′ (7)	75' (7)	0' (0)
R8 narrow street	125' (12)	145' (14)	20' (2)
R8 wide street (outside MN Core)	145′ (14)	145' (14)	0' (0)
R8 wide street (inside MN Core)	125' (12)	145' (14)	20′ (2)
R9 (narrow street)	145′ (14)	175' (14)	30′ (3)
R9 (wide street)	155' (15)	175' (15)	20′ (2)
R10 (narrow street)	195' (19)	235' (19)	40' (4)
R10 (wide street)	215' (21)	235' (21)	20′ (2)

## What are "contextual" building envelopes?

- Established in 1987 to promote housing that fit better within neighborhoods than the previous "tower-in-the-park" model
- Required in contextual zoning districts
- Optional in non-contextual districts





## By modernizing categories and allowing for mixed configurations, zoning can enable the City to better address the diverse needs of seniors

## **TYPES**

**CONFIGURATIONS** 

#### **SPECTRUM OF HOUSING TYPES**



## OPTIONS FOR MIXED HOUSING WITH AN AFFORDABLE COMPONENT

OPTIONS FOR MIXING VARIOUS REGULATED, INCOMERESTRICTED AND MARKET-RATE HOUSING TYPES







#### **OPTIONS MIXED SENIOR LONG TERM CARE**

OPTIONS FOR MIXING VARIOUS STATE LICENSED CARE FACILITY TYPES







CONTINUING CARE
RETIREMENT COMMUNITY



## The proposal would apply citywide to both existing and new affordable senior housing and long-term care facilities



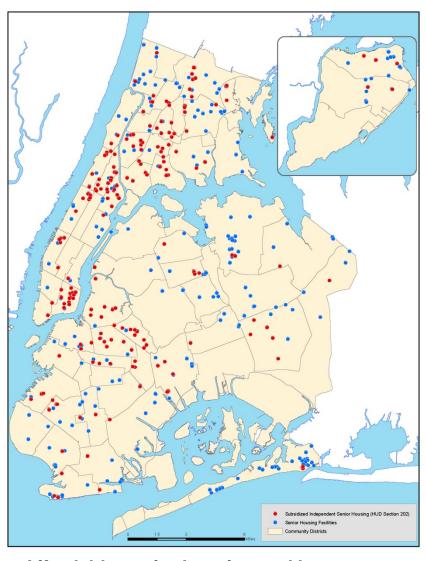
### Affordable Independent Residences for Seniors

Housing designed specifically for seniors with smaller units, more shared common areas and amenities. Age and income restricted with a regulatory agreement.



#### **Long Term Care Facilities**

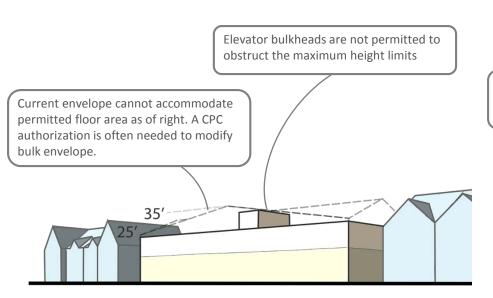
Nursing homes, assisted living facilities, continuing care retirement communities and other long term care licensed by NYS Dept of Health. Can be single or shared apartments or rooms with support spaces.





Affordable senior housing and long term care facilities in New York City

## How Much Additional Height Is Needed for Affordable Senior Housing and Care Facilities?



Elevator bulkheads are permitted to

obstruct the maximum height limits

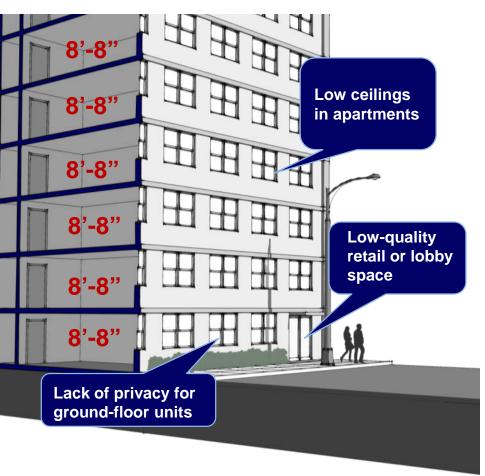
Existing R4 envelope, 150' x 100' interior lot

Proposed R4 envelope, 150' x 100' interior lot

Low-density districts that allow multifamily housing: Buildings would not exceed 4 to 6 stories



### **Current Example**



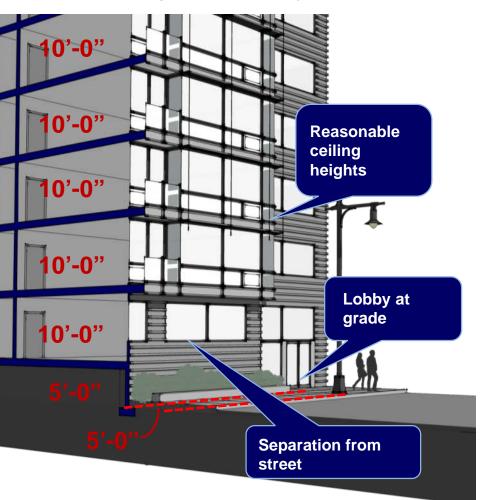


1987 Prototypical 'Contextual Zoning' Building

**Recent Construction - Brooklyn** 

## Accommodate improved exterior and interior building design – Residential Districts

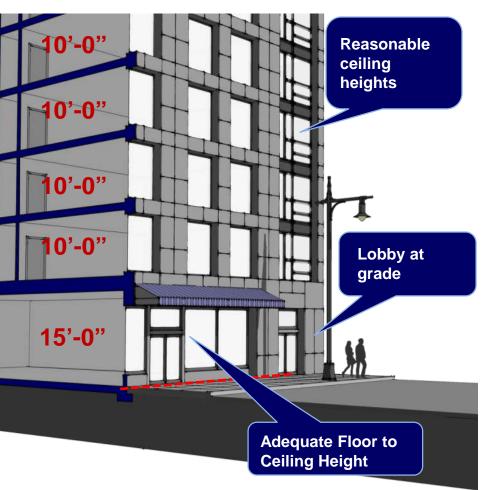
Update zoning to allow today's best practices for design and construction of housing



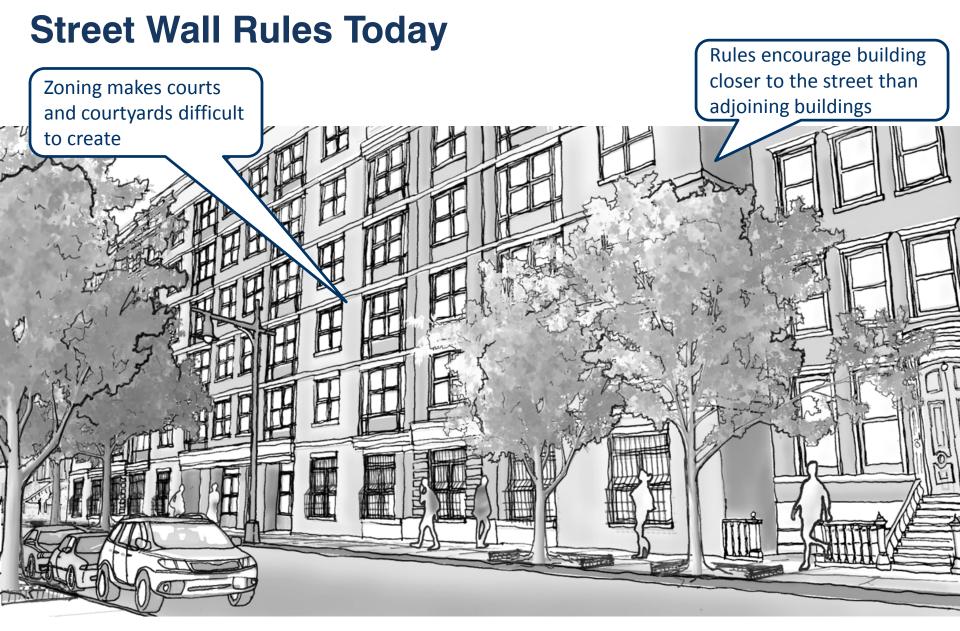


## Accommodate improved exterior and interior building design – Commercial Districts

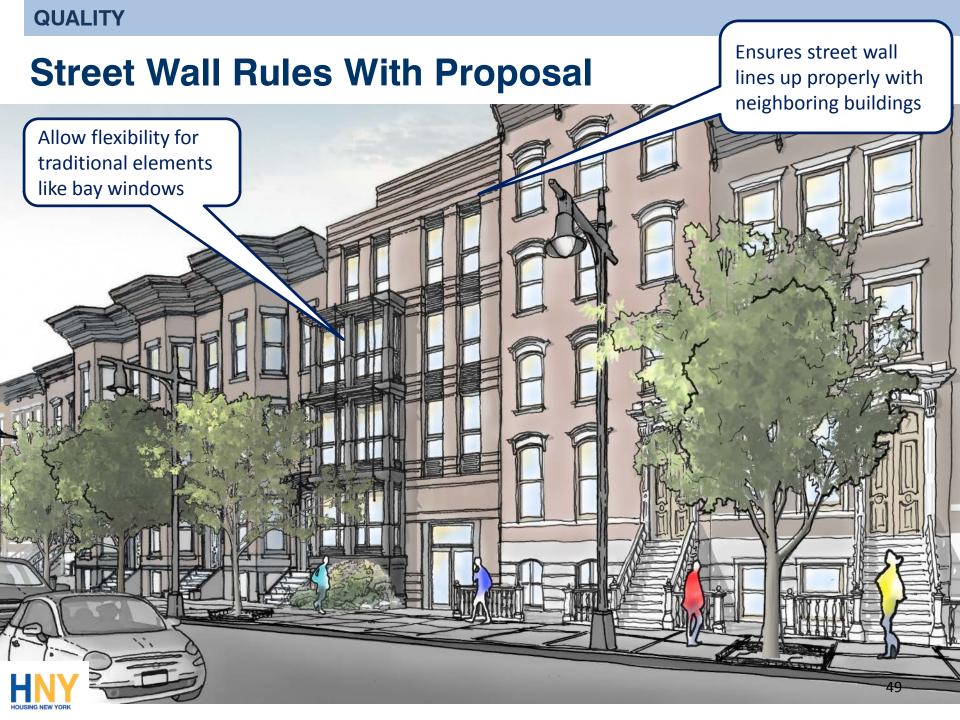
Update zoning to allow today's best practices for design and construction of housing.

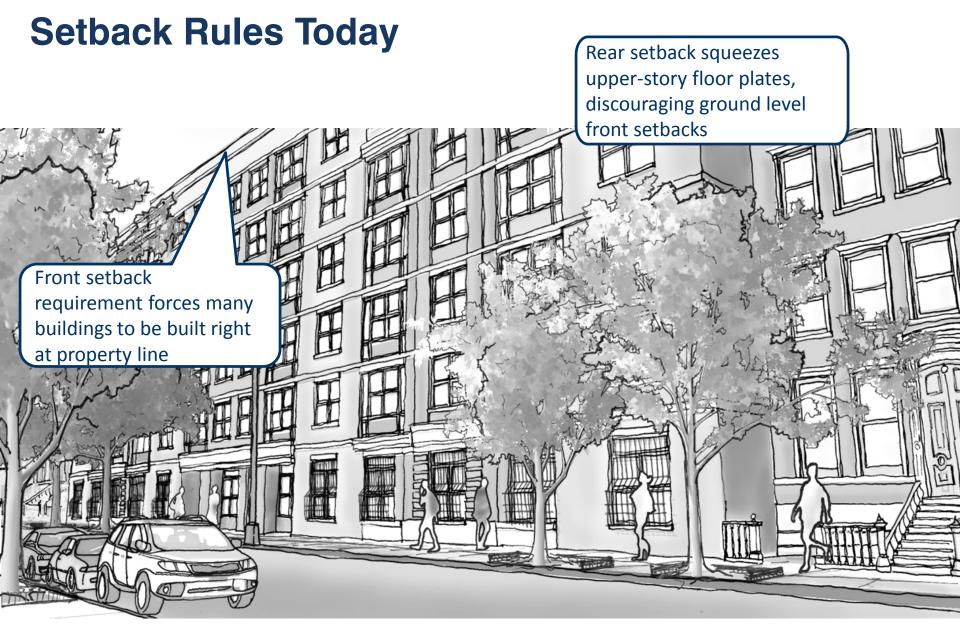




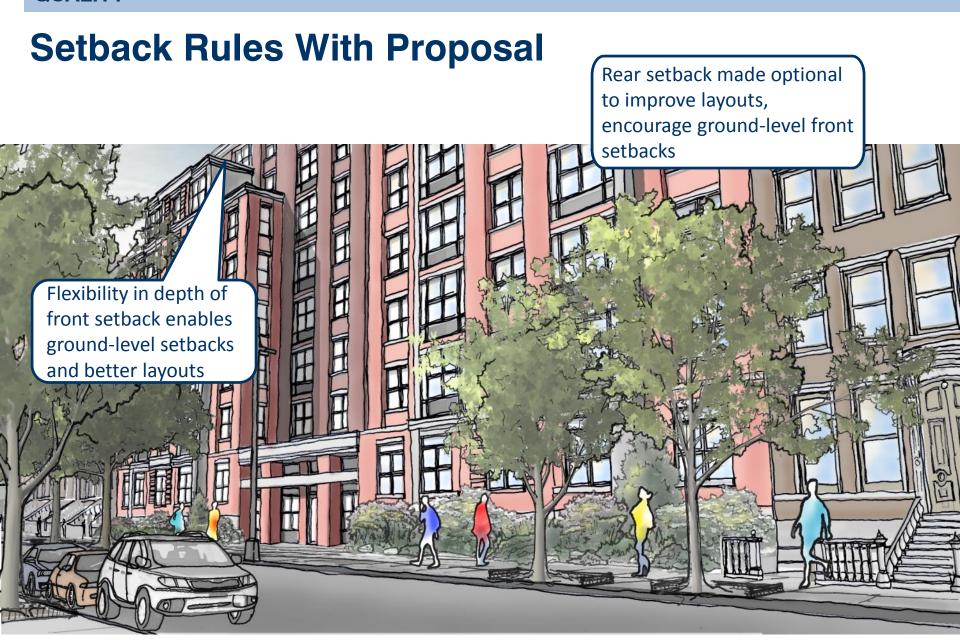














### **Unit Density Controls**

#### Why Does Zoning Need To Change?

Current "density factors" were adapted from older regulations

No reason to require a larger average unit size in the highest density districts than in mediumdensity districts

Minimum unit size (400 sf) limits ability to provide a wider mix of unit sizes in a building

District	Existing DUF	Proposed DUF
R4	900	900
R5	760	760
R6, R7	680	680
R8, R9	740	680
R10	790	680

#### **Proposal**

Allow same average unit sizes in all mediumand high-density residence districts

Allow unit sizes to be controlled by "density factors" and Building Code



### **Irregular Sites**

## Why Does Zoning Need To Change?

Most zoning regulations were based on regular, 100-foot-deep sites

However, today's housing sites are frequently irregular or shallow – especially outside Manhattan

#### **Proposal**

In R6 through R10 districts, accommodate better buildings with adjustments for:

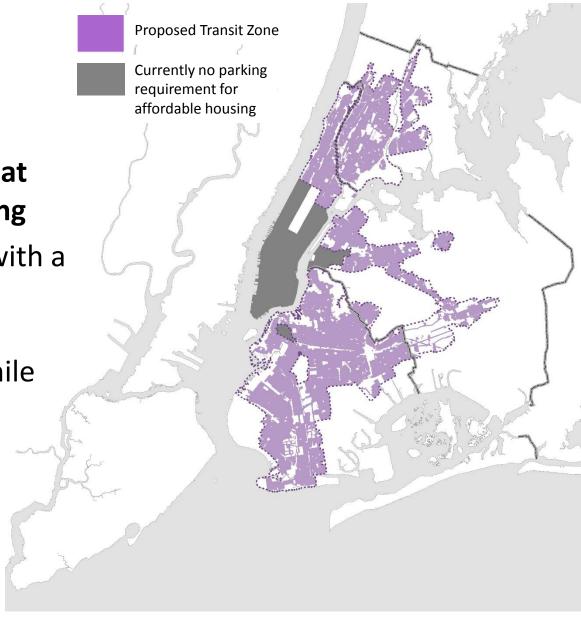
- Shallow Lots
- Sloping Sites
- Distance Between Buildings
- Relief for Unusual Conditions





## **Proposed Transit Zone**

- Includes only districts that allow multifamily housing
- Denser neighborhoods with a variety of public transportation options, generally within a half-mile of a subway station
- Reflects existing low car ownership rates within Transit Zone



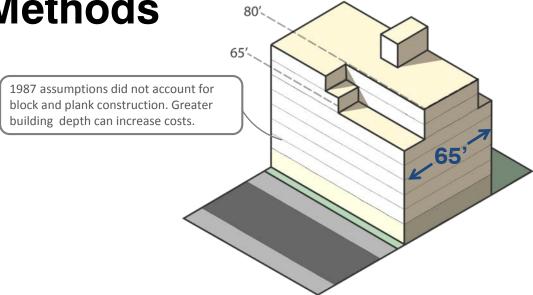


#### **New Construction Methods**

Accommodate 'block and plank' construction, which, because of precast concrete planks, creates a fixed maximum building depth roughly 60' deep.

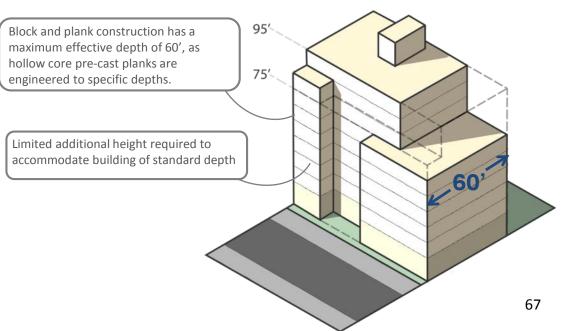






#### **Block and Plank Construction**

1987 'Contextual' Building



#### AFFORDABLE SENIOR HOUSING

#### **Non-contextual R6 Districts**

Proposal requires use of contextual, Quality Housing building envelope

However, to better address difficult site conditions, proposal also includes a more-flexible Quality Housing envelope for sites located close to:

- Open railroad right of way;
- Highways;
- An elevated street located on a bridge

District	Base Height	Overall Height (stories)
R6	65'	115 ' (11)



Via Verde, Bronx



### **Key Elements of the Proposal**

## **Goal:** Support the creation of Inclusionary Housing

- When buildings participate in the Inclusionary Housing program, allow the same height as proposed for buildings providing affordable senior housing
- Would apply where:
  - The voluntary IH program applies today
  - The proposed new Mandatory IH program is applied in the future



### **Key Elements of the Proposal**

Goal: Make taxpayer dollars go further by enabling cost-effective, transit-accessible affordable housing

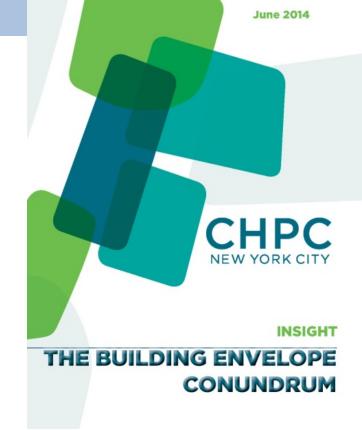
Designate a "transit zone" where auto ownership and commutes by car are low, in which:

- Parking would become optional for new Inclusionary Housing or low-income housing
- Where appropriate, other modifications allowed:
  - Removal of parking for existing affordable senior housing
  - For other affordable or mixed-income housing, reduction of requirements possible on a case-by-case basis



# Rules have not kept pace with housing regulations and best practices

- Regulations: Increased requirements for fire prevention and accessibility in building codes and other regulations
- Floor-to-floor heights: Increasing and closer to historic norms
- Construction Practices: New methods like "block and plank" and modular construction
- Site Conditions: More irregularly shaped lots being developed







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