



BUILDINGS

2026-016

BULLETIN

ZONING

ISSUANCE DATE
October 13, 2026



ISSUER: Keith Wen, R.A. 
Assistant Commissioner
Code and Zoning Interpretation

PURPOSE: This Bulletin describes how to apply the regulations of ZR 54-52, which allows a new non-compliance or increase in the degree of non-compliance.

SUBJECT(S): Accessibility or Safety Retrofits which Increase or Create New Non-compliance

RELATED ZONING SECTIONS & RESOURCES: ZR 54-52

I. BACKGROUND

As part of the City of Yes zoning amendments, ZR Section 54-52 Accessibility or Safety Retrofits was added, effective December 5, 2024. These provisions permit certain enlargements and other alterations to create new non-compliances or increase the degree of existing non-compliance that directly furthers the design and construction of facilities for accessibility for individuals with disabilities or furthers building safety by greater conformance with the most recent New York City Construction Codes. This Bulletin is effective immediately.

II. APPLICABILITY

This Bulletin applies to applications utilizing ZR 54-52, including:

- Applications to legalize existing unlawful construction, including enlargements and extensions of use
- Buildings with and without existing non-compliances

Multiple new non-compliances or increases in degree of non-compliance may be combined in the scope of a single project, but limitations on aggregation of bulk allowances apply. See guidance in [Buildings Bulletin \(BB 2026-018\)](#) on how the retrofit provisions of ZR 54-51, ZR 54-52, and ZR 54-53 may or may not be combined and the limitations on the aggregation of bulk allowances for applications utilizing this Bulletin (ZR 54-52) in combination with ZR 54-53, as well as when an application utilizes ZR 54-52 more than once.

ZR 54-52 is only applicable if an Existing Building defined by Part III of this Bulletin, as it stands today, would not fully comply with the current Building Code if the Code was applied as if it were a new building, or if an Existing Building lacks certain required Accessibility features.

Accessibility and/or Safety retrofits on an Existing Building that are newly required by Code due to a proposed enlargement or change in use or occupancy cannot utilize ZR 54-52. For example, an existing four-story walkup commercial building is proposed to be enlarged with a new fifth floor within the vertical extension of the fourth-floor perimeter walls. The addition of an elevator to provide minimum Code-mandated access as a result of the enlargement on the fifth floor and the rest of the floors does not qualify for ZR 54-52.

III. DEFINITIONS AND TERMS FOR THE PURPOSES OF THIS BULLETIN

Terms for the purposes of this Bulletin only:

Accessibility

A function of an enlargement, extension, conversion, change of zoning use or alteration that increases the usability of an Existing Building or portions of such building by individuals with disabilities but not mandated by Code based on the proposed scope of work. An accessibility retrofit must meet all of the following conditions and be demonstrated in the zoning analysis of the application:

1. Such portion of the scope of work must increase the degree of accessibility of the Existing Building portion, as determined by the plan examiner.
2. Only qualified work under item 1 can increase zoning non-compliance or create a new zoning non-compliance.
3. Qualified work under item 1 for buildings other than single- and two-family residences must comply with the Code requirements for accessibility as per Chapter 11 of the New York City Building Code. In single- or two-family residence(s) the degree of accessibility only needs to be increased.

Existing Building

A building must be existing before it can be “retrofitted” pursuant to ZR 54-52. In the context of this ZR section, this means the following:

1. The entire building has a Temporary or Final Certificate of Occupancy, or
2. Where a building was constructed prior to when certificates of occupancy were required, and the applicant is able to provide documentation of the building’s legal existence to the satisfaction of the Department.

Open Area

Open area shall be a Yard, Open Space, or Court as listed in ZR 54-52(b) that is required and compliant with Zoning, or non-compliant due to an Existing Building.

The lowest level of a Yard in a Residential District shall not be higher than curb level unless the natural grade is higher per ZR 23-313; whereas other types of Open Areas may be on the roof of a portion of a building as indicated in Zoning, such as required *residential rear yards* being provided at the floor level of the lowest story per ZR 35-53 (Modification of Rear Yard Requirements).

For the purpose of this Bulletin, open areas do not include areas that may result from Zoning streetwall line-up rules (such as ZR 23-431).

Safety

A function of an enlargement, extension, conversion, change of zoning use or alteration that increases the level of Existing Building safety by complying with any applicable section of the New York City Construction Codes as described below. A safety retrofit must meet all of the following conditions and be demonstrated in the zoning analysis of the application:

1. Such portion of the scope of work must be designed to serve solely the existing portion of the building and increase the level of safety of the Existing Building, as determined by the plan examiner.
2. Only qualified work under item 1 can increase zoning non-compliance or create a new zoning non-compliance.
3. Qualified work under item 1 must comply with all the respective applicable Code requirements in the New York City Construction Codes, including 1968 Building Code and 1938 Building Code where such Prior Codes are allowed to be used by AC 28-101.4.3. For example, a new exit stair that increases the level of safety must meet all relevant Code requirements to qualify, including but not limited to tread size, width, headroom, fire-resistance-rating, direction of door swing, etc.

Utilization

A lawful enlargement resulting in non-complying bulk pursuant to ZR 54-52 and ZR 54-53.

Yards

Yards are defined in ZR 12-10. However, for the purposes of this Bulletin, yards also include rear yard equivalents as defined in ZR 12-10.

IV. INTERPRETATION

The first paragraph of ZR 54-52 states:

Notwithstanding the other provisions of this Chapter, in all districts, an enlargement, extension, conversion, change of use or other alteration to a building that furthers the design and construction of facilities for accessibility for individuals with disabilities or furthers building safety by greater conformance with the most recent New York City Construction Codes, may create a new non-compliance or increase the degree of a non-compliance, provided that increases to existing non-compliances, or the creation of new non-compliances, with regard to:

Because ZR 54-52 applies only to “an enlargement, extension, conversion, change of use or other alteration”, it does not apply to the “development” of a new building. An application proposing to utilize ZR 54-52 cannot be the same job application that results in a proposed new building. As such, a post-approval amendment (PAA) of the original new building application to utilize ZR 54-52 is not permitted.

Items not specified with paragraphs (a), (b) and (c) in ZR 54-52 may not be encroached upon or exceeded, such as street wall location requirements. For example, for paragraph (b), only front yards, side yards, rear yards, rear yard equivalents and courts may be encroached upon, and for sky exposure plane buildings, required open space may also be encroached upon. Note that the term “open space” is defined in the Zoning Resolution and it refers to a specific type of open area.

Existing Buildings that are damaged or destroyed and reconstructed pursuant to ZR 54-40 may utilize ZR 54-52 in the same application that replaces the original building.

A. Floor Area

Paragraph (a) of ZR 54-52 states:

maximum floor area ratio shall not exceed ten percent of the existing floor area, or 1,000 sf, whichever is less

For each application, increases in non-compliance or new non-compliances that directly contribute towards Accessibility or Safety can exceed the maximum floor area of the zoning lot (as defined in ZR 12-10) by up to 1,000 SF or 10% of the existing floor area (including existing non-complying floor area that was legally constructed) of the Existing Building, whichever is less. For example, a new elevator shaft, including its vestibules, that does not comply with zoning bulk is permitted, provided it complies with all other applicable regulations. Note that elevator shafts and stair wells on all stories must count towards the zoning Floor Area of the building pursuant to ZR 12-10 Floor Area definition.

B. Open Area

Paragraph (b) of ZR 54-52 states:

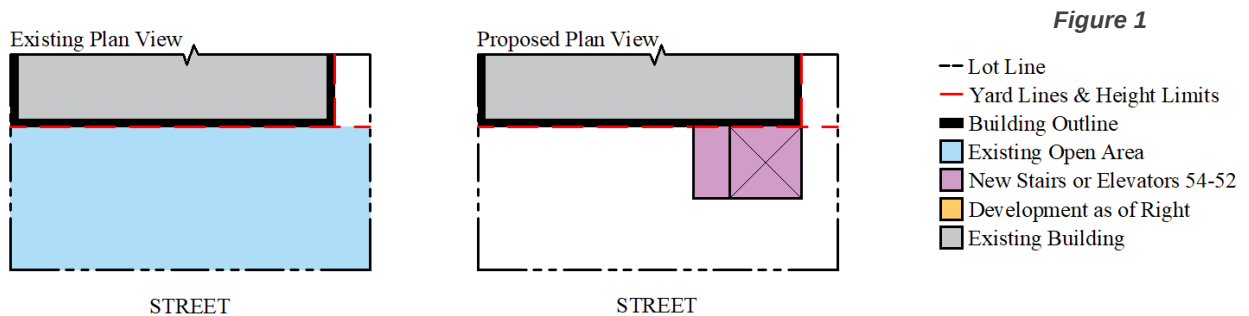
required open space, yards, rear yard equivalents, or courts, as applicable, shall not diminish the size of the required or existing open area, as applicable, by more than 20 percent, and no further encroachment to a non-complying yard shall be closer to a lot line than an existing building on the zoning lot;

Existing individual yard or court as denominator

When calculating the square footage of the existing Open Area to demonstrate compliance with the 20 percent maximum diminishment, the denominator in the calculation should be an individual yard or court.¹

The existing Open Area to be diminished by a Safety or Accessibility retrofit may be complying or non-complying. If such Open Area is complying, the denominator is based on the required Open Area. If the Open Area is lawfully existing non-complying, the denominator is the existing non-complying Open Area. See ZR 54-50 [Buildings Bulletin \(BB 2026-018\)](#) on how the baseline condition is determined in other scenarios.

For example, a complying front yard may be diminished by up to 20% as shown in the diagram of the proposal in Figure 1 below:



For corner lots with more than one front yard, please see [Buildings Bulletin \(BB 2026-017\)](#) Part IV (A3) for guidance on calculating the denominator.

Limit of Encroachment into a non-complying yard

Paragraph (b) states, in relevant part: “...no further encroachment to a non-complying yard shall be closer to a lot line than an existing building on the zoning lot...”

An Accessibility or Safety enlargement may be proposed in a lawful non-complying yard. However, the proposed enlargement cannot be closer to the lot line than the original building in the same individual yard. For example, an existing building encroachment into a rear yard near a side lot line does not establish the ability for an enlargement to encroach into a side yard along the same side lot line.

Note that the language in ZR 54-52 differs from that in ZR 54-53. ZR 54-52 applies to both required (complying) and existing (non-complying) Open Areas. Because of this, DOB interprets the “no further encroachment” in ZR 54-52 to be a constraint only where the encroachment is in a non-complying yard.

For example, a site similar to that shown in Figure 1 but with a noncomplying front yard may be diminished, but the encroachment may not be closer to the street line than the existing building, as shown in Figure 2 below:

¹ Note that for sky exposure plane buildings, the minimum open space must also be calculated for the entire zoning lot, whether or not it overlaps with required yard(s) or minimum dimensions for courts.

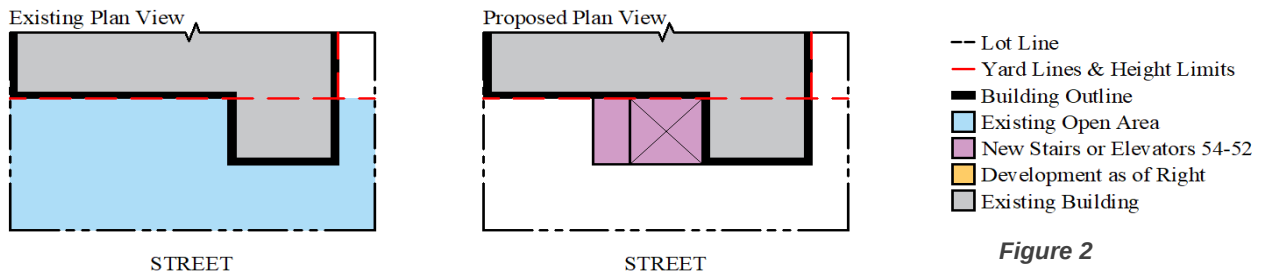


Figure 2

Maximum height in Open Area: Paragraph (b) states, in relevant part: “...shall not diminish the size of the required or existing open area, as applicable, by more than 20 percent...”

The proposed enlargement with an Accessibility or Safety retrofit must also comply with paragraphs (a) and (c) of ZR 54-52. DOB interprets “size” in the language of ZR 54-52(b) to allow a greater nonconformance in height than enlargements allowed by ZR 54-53(b). The maximum height for Accessibility or Safety retrofits Utilizing 54-52(b) is up to one story, up to 15ft above the tallest height of the portion of the Existing Building being served. For example, an elevator with vestibules for Accessibility, or a staircase for Safety, within a diminished Open Area may extend to one story, up to 15ft above the roof level of the Existing Building if service is provided at roof level.

C. Maximum Height

Paragraph (c) of ZR 54-52 is as follows:

the permitted height and setback of a building, shall be limited to one story or 15 feet, whichever is less, measured relative to the height of the existing building.

The proposed enlargement is measured relative to the height of the portion of the Existing Building, regardless of the zoning height limit. No more than one story or 15ft, whichever is less, can be added above the Existing Building height. For example, if an existing building in an R4B district is 23ft tall (two feet below the maximum height limit), the maximum height that can be achieved is 38ft. See additional guidance in ZR 54-53 [Buildings Bulletin \(BB 2026-017\)](#) for height measurement to buildings with varying existing heights.

Note that elevator equipment may be considered as accessory mechanical equipment pursuant to ZR 54-51(b) and not be subject to limits of ZR 54-52(c).

For more specific examples, see Section VI below. Additional guidance in other specific scenarios of Existing Buildings are described in ZR 54-53 [Buildings Bulletin \(BB 2026-017\)](#) Section IV, Parts A, B, C4, C5, E, and Section VII Examples.

D. Other Allowance

The final paragraph of ZR 54-52 states,

Allowances for permitted obstructions may be applied to an existing building, including as modified pursuant to the provisions of this Section.

Permitted obstruction provisions in zoning still apply after utilizing ZR 54-52, such as permitted obstructions on the roof of a building that is a permitted obstruction in a rear yard pursuant to ZR 23-341(b) (3), ZR 33-42, and ZR 43-42.

The definition of lot coverage in ZR 12-10 includes an exemption from lot coverage for permitted obstructions in residential rear yards and rear yard equivalents. The final sentence of ZR 54-52 in this context also means that the exemption from lot coverage extends to a portion of a single- or two-family residence, or an ancillary dwelling unit, in a rear yard per ZR 23-341(b)(4), when utilizing ZR 54-52(b) in a rear yard.

V. ZONING PLANS & ZD1 REQUIREMENTS

ZD1 drawings and zoning data in the submission drawings must indicate the proposed new non-compliances per ZR 54-52, including the subsection, and whether Accessibility or building Safety is upgraded in accordance with this Building Bulletin.

1. Accessibility improvement for single- or two-family homes: describe the Accessibility feature being added, and to which floor(s)
2. For Accessibility improvement in all other types of buildings, and for building Safety improvement in all types of buildings, the zoning analysis must include the following table:

Safety or Accessibility Element	Applicable NYC Construction Code section	Proposed Utilization and applicable ZR 54-52 section	Code Analysis
List proposed building element that furthers Accessibility or Safety	Cite relevant Code sections	Cite the paragraph utilized and proposed usage amount	Narrative describing how the qualified work improves Accessibility or building Safety citing relevant Code sections

Also see separate guidance in [Buildings Bulletin \(BB 2026-018\)](#) when accounting for any previously completed Utilizations of ZR 54-52 or ZR 54-53.

APPENDIX OF EXAMPLES

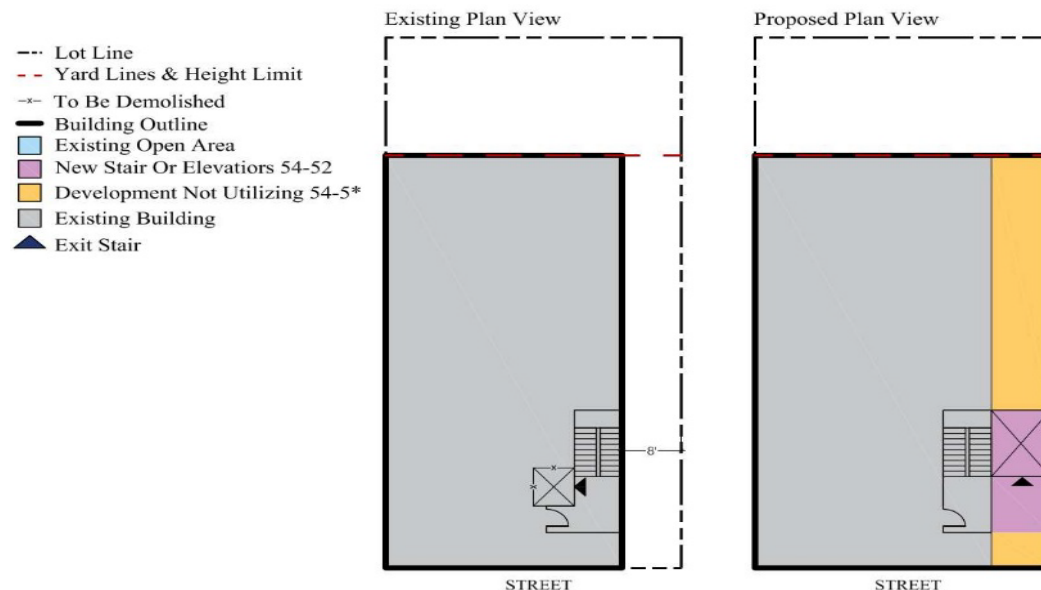
VI. EXAMPLES OF SAFETY RETROFITS

A. Example: Relocate an elevator into a shaft enclosure.

A five-story Existing Building of 7,000 sf ZFA has an elevator that opens into the stair enclosure, which is not permitted in a new building today. The maximum permitted ZFA is 8,000 sf. An enlargement application is submitted, including the removal of the existing elevator, which opens into the stair enclosure, contrary to BC 713.7, and the installation of a new elevator in a two-hour rated shaft enclosure, opening to the building lobby and interior tenant space. The proposed enlargement without the new elevator exhausted the max permitted ZFA of 8,000 sf.

Utilization of ZR 54-52(a) can create a new non-compliance by adding the new elevator and associated circulation area of 700 sf (lesser of 7,000 x 10% and 1000 sf). The applicant may increase the floor area of the building by 700 sf by utilizing ZR 54-52(a) plus 1,000 sf based on underused FAR, resulting in the total proposed ZFA of 8,700 sf. Note that ZFA allowance generated by the enclosed elevator and vestibule utilizing ZR 54-52 must serve the existing portion of the building.

The zoning analysis must show the following on the plan:



ZR 54-52(a) Qualification

1. Increase in Safety is achieved by removing the noncomplying elevator pertaining to BC 713.7 and installing a complying elevator in accordance with BC 3002.1 and BC 713.4. The enclosed elevator serves the existing portion of the building.
2. On every floor, only qualified work under item 1 can increase zoning non-compliance or create a new zoning non-compliance.
3. The elevator hoistway enclosure complies with BC 3002.1 and BC 713.4

ZR 54-52(a) Calculation

Existing ZFA: 7000 sf

Max ZFA permitted per ZR 54-52(a): The lesser of (7,000 sf x 10% = 700 sf) 700 sf and 1,000 sf is 700 sf.

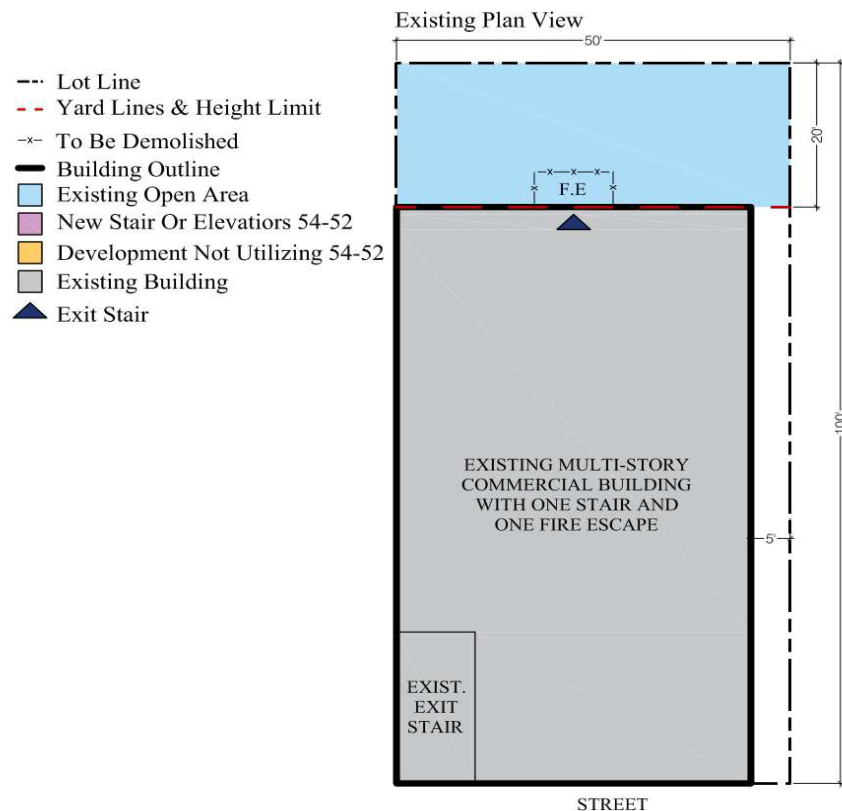
Proposed ZFA: 8,000 sf as-of right + 700 sf allowance = 8,700 sf total

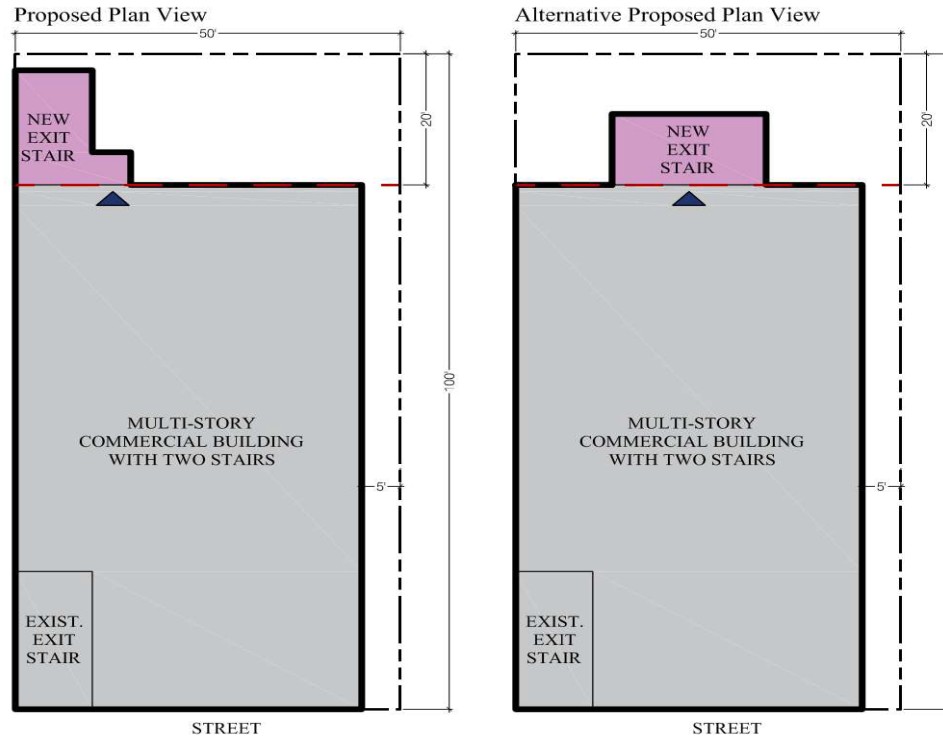
ZR 54-52 Table for this Element

Safety Element	Applicable NYC Construction Code Section	Proposed Utilization and Applicable ZR 54-52 Section	Code Analysis
Fire-rated hoist way enclosure of new elevator shaft and associated circulation area	BC 3002.1 BC 713.4	ZR 54-52(a) 700 sf additional ZFA	Increase in Safety achieved by removing the noncomplying elevator pertaining to BC 713.7 and installing a complying elevator in accordance with BC 3002.1 and BC 713.4. The elevator serves the existing portion of the building.

B. Example: Replace fire escapes with an enclosed exit stair in a complying rear yard

The multi-story commercial Existing Building was erected under the 1938 Code. The first means of egress is provided as an enclosed exit stair from a corridor, and the second means of egress is provided as fire escapes via a non-complying side yard that is 5' wide. The zoning lot has a complying 20' deep rear yard that is 50' wide, for a total area of 1000 sf, shown as the area in cyan. The existing fire escape is proposed to be removed and a new enclosed exit stair of 200 sf ($1000 \times 20\% = 200$ sf) is proposed in a diminished area of the required rear yard to take advantage of ZR 54-52(b), resulting the remaining open area shown in cyan of 800 sf, as shown in two complying options below:





To qualify for the 200 sf of new non-compliance, the zoning analysis must show the following on the plan:

ZR 54-52(b) Qualification

1. Increase in Safety is achieved by removing the fire escape, which is unqualified as a means of egress for a commercial building per AC 27-380, and replacing it with a complying second means of egress. The new stair serves all tenant space in the existing portion of the building.
2. On every floor, only qualified work under item 1 can increase zoning non-compliance or create a new zoning non-compliance.
3. The new stair complies with two exit stairways requirement of BC 1006.

ZR 54-52(b) Calculation

- Existing area of the complying rear yard: 1,000 sf
- Max open space permitted to be diminished per ZR 54-52(b): $1,000 \text{ sf} \times 20\% = 200 \text{ sf}$
- Proposed portion of the exit stair located in the required rear yard as the diminishment of the rear yard: 200 sf, and therefore complies.

ZR 54-52 Table for this Element

Safety Element	Applicable NYC Construction Code Section	Proposed Utilization and applicable ZR 54-52 Section	Code Analysis
Enclosed second exit stair	BC 1006	ZR 54-52(b) 200 sf diminishment in the required rear yard	Increase in Safety is achieved by removing the fire escape, which is unqualified as a means of egress for a commercial building per AC 27-380, and replacing it with a complying second means of egress to serve the existing portion of the building.

C. Example: Replace fire escape with an enclosed exit stair in a non-complying rear yard

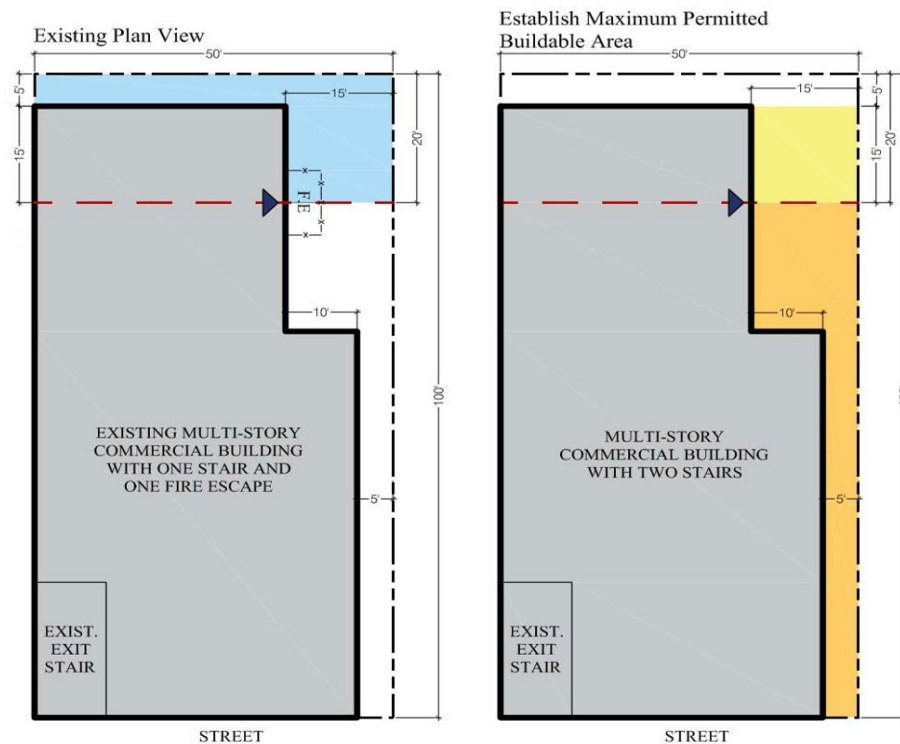
The multi-story commercial Existing Building was erected under the 1938 Code on an interior lot 50' wide x 100' deep. The first means of egress is provided as an enclosed exit stair from a corridor, and the second means of egress is provided as fire escapes via a non-complying side yard of 5' wide. The zoning lot has a non-complying 5' deep rear yard of 475 sf (shown in the diagram). The existing fire escape is proposed to be removed and a new enclosed exit stair, extending to the roof, is proposed, which is partially located in the required rear yard to take advantage of ZR 54-52(b) as a part of the building enlargement.

Open Area – Rear Yard

The first step of the design is to determine which portion of the site is buildable by the “no further encroachment” limit in ZR 54-52(b) for a non-complying rear yard. In this example, the existing building partially extends into the required rear yard, making it a noncomplying rear yard shown in cyan. The area shown in yellow represents the limit of the “no further encroachment” requirement in the non-complying rear yard and the white area of such rear yard must remain open.

Open Area – Side Yard

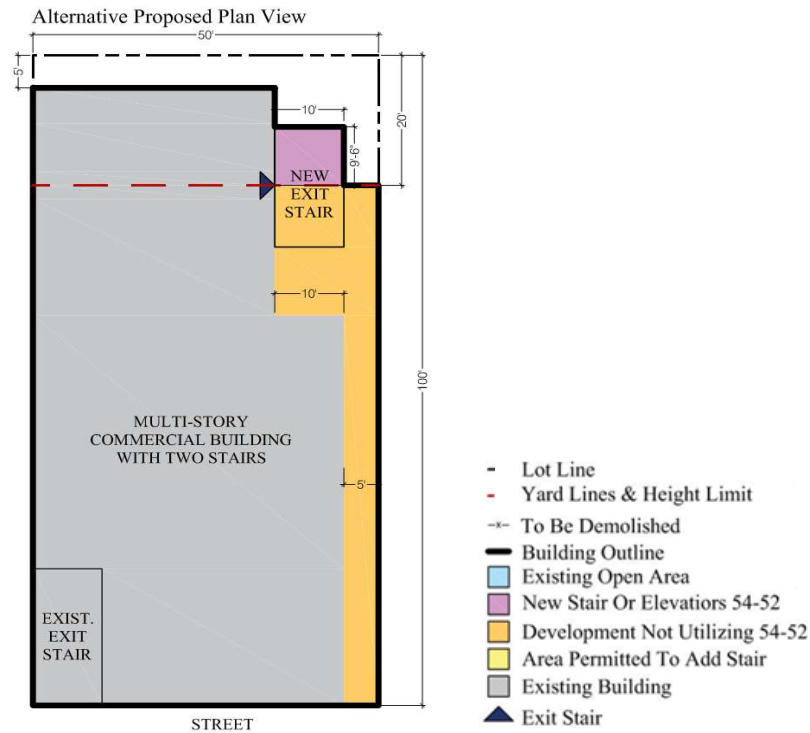
The second step of the design is to determine which portion of the site is buildable without utilizing ZR 54-52(b). In this example. The orange area represents the buildable area outside and required yard, and the existing side yard that can be eliminated in accordance with ZR 33-25. Both the yellow area and the orange area are buildable area.



See legend in the next diagram below for the third step

The third step is to calculate the open space diminishment and lay out the exit stair on the plan.

- Existing open space in the rear yard = 5' x 50' + 15' x 15' = 475 sf, shown in cyan in the existing plan view
- Maximum diminishment allowed: 475 sf x 20% = 95 sf



To qualify for the 95 sf of rear yard diminishment in the non-complying yard, the zoning analysis must show the following on the plan:

ZR 54-52(b) Qualification

1. Increase in Safety is achieved by removing the fire escape, which is unqualified as a means of egress for commercial building per AC 27-380, and replacing it with a complying second means of egress.
2. On every floor, only the qualified work under item 1 can increase zoning non-compliance or create a new zoning non-compliance.
3. The new stair complies with two exit stairways requirement of BC 1006.

ZR 54-52(b) Calculation

- Existing area of non-complying rear yard: 475 sf
- Max open space permitted to be diminished per ZR 54-52(b): $475 \text{ sf} \times 20\% = 95 \text{ sf}$
- Proposed portion of the exit stair located in the non-complying rear yard: 95 sf (shown in purple), and therefore complies

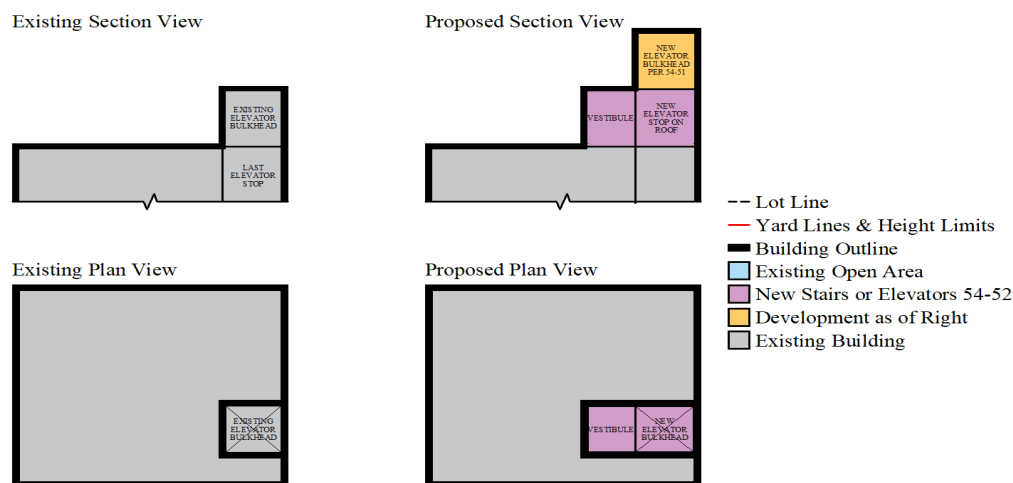
ZR 54-52 Table for this Element:

Safety Element	Applicable NYC Construction Code Section	Proposed Utilization and Applicable ZR 54-52 Section	Code Analysis
Enclosed second exit stair	BC 1006	ZR 54-52(b) 95sf open space diminishment in the required rear yard	Increase in Safety is achieved by removing the fire escape, which is unqualified as a means of egress for a commercial building per AC 27-380, and replacing it with a complying second means of egress.

VII. EXAMPLES OF ACCESSIBILITY RETROFITS

A. Example: Elevator extended to 15' above noncomplying roof exceeding maximum height

The Existing Building is legally non-complying as to maximum building height (the top story and bulkhead are shown in the section diagram) and has an existing legal passive recreation space on the roof. The proposed enlargement will consist of extending the elevator shaft to serve the rooftop, and thus making the roof level recreation space Accessible. The proposal also includes a reasonably-sized vestibule that meets Accessibility requirements. The new elevator bulkhead is permitted above the top service story of the elevator pursuant to ZR 54-51(b). Only one story will be added above the roof of the Existing Building, measuring 14ft in height relative to the height of the existing rooftop in that location, and thus permitted. The 70 SF increase in zoning floor area is within 1,000 SF or 10% limit per ZR 54-52(a), so the enlargement is permissible even if the building already exceeds maximum FAR for the zoning lot.

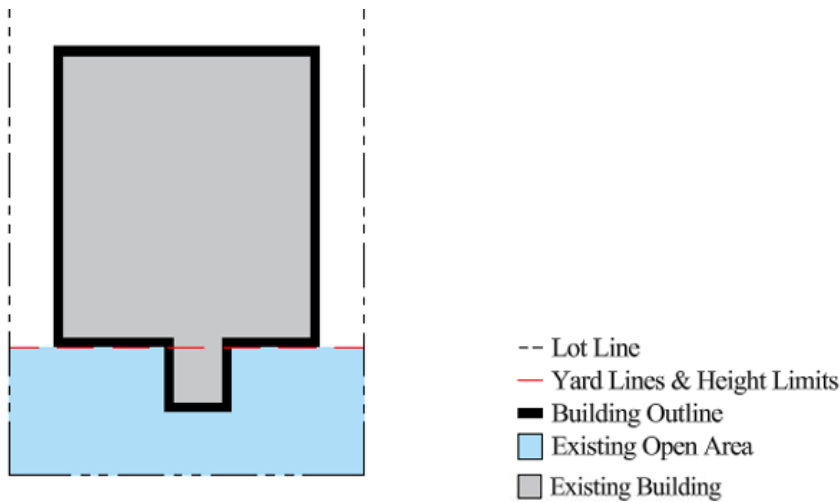


ZR 54-52 Table for this Element:

Accessibility Element	Applicable NYC Construction Code Section	Proposed Utilization and Applicable ZR 54-52 Section	Code Analysis
New voluntary elevator to roof terrace on Existing Building	BC 3002.1 BC 713.4	ZR 54-52(a) 70 SF increase in maximum FAR ZR 54-52(c) 15' above existing building height	Increase in Accessibility is achieved by voluntarily providing an elevator in accordance with BC 3002.1 and BC 713.4.

B. Example: Elevator enlargement in non-complying front yard

An existing 4-story building with 6,000 sf of zoning floor area on a 30 X 100 foot zoning lot (3,000 sf) in an R5 District has a legal non-complying encroachment into the required front yard, consisting of a portion that is one story tall, 6ft wide and 4ft deep into the required front yard (with 6ft remaining between the building and the street line).



The applicant proposes a new elevator shaft with a footprint measuring 4 X 6 feet that would be an increase in non-compliance pursuant to ZR 54-52. The proposal must comply with ZR 54-52 paragraphs (a), (b), and (c) for floor area, Open Area, and maximum height.

While an elevator is not required by Code for this 4-story building, it must be constructed in accordance with BC 30 (Elevators and Conveying Systems).

Floor Area

The floor area may be increased by up to 10% of the existing floor area, or 1,000 sf, whichever is less. The lesser value is 10% of 6,000 sf, which is 600 sf of allowable increase in floor area due to the elevator and related vestibules per ZR 54-52(a). If the elevator has 5 stops above cellar level, the elevator will occupy about 120 total square feet.

ZR 54-52(a) calculation

- Existing floor area: 6,000 sf
 - 10% of 6,000 sf = 600 sf maximum within the front yard
 - Proposed ZFA: 24 sf X 5 stories = 120 sf (< 600 sf OK)

Open Area - Front Yard

The existing front yard is noncomplying. Therefore, the calculation of diminished front yard area is based on the existing Open Area, which is 276 sf. The maximum increase in non-compliance is 20% of this Open Area, or 55.2 sf. The elevator will increase the degree of non-compliance by 32 sf.

The new encroachment also may not be closer to the street line than the existing encroachment, so the maximum diminishment in depth of such yard is equal to the depth of the existing non-compliance, or 4ft.

ZR 54-52(b) Calculation

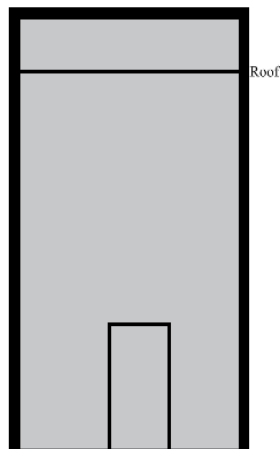
- Max diminished area per ZR 54-52(b): 20% of the existing front yard:
 - Existing front yard Open Area = 276 sf
 - Max encroachment = 20 % of 276 sf = 55.2 sf
 - Proposed: 32 sf (< 55.2 sf and not closer to front lot line than existing building, OK)



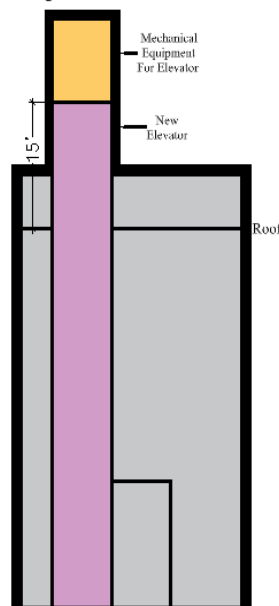
Existing Height (in Example)

The improved Accessibility from the elevator and its vestibules have a maximum height of 15ft taller than the existing roof with up to one elevator stop on the roof. Pursuant to ZR 54-51, the elevator bulkhead may be constructed above the elevator height limit, provided that it meets the maximum bulkhead size of ZR 23-412(c)(1) or ZR 24-51(b) (Additional permitted obstructions)

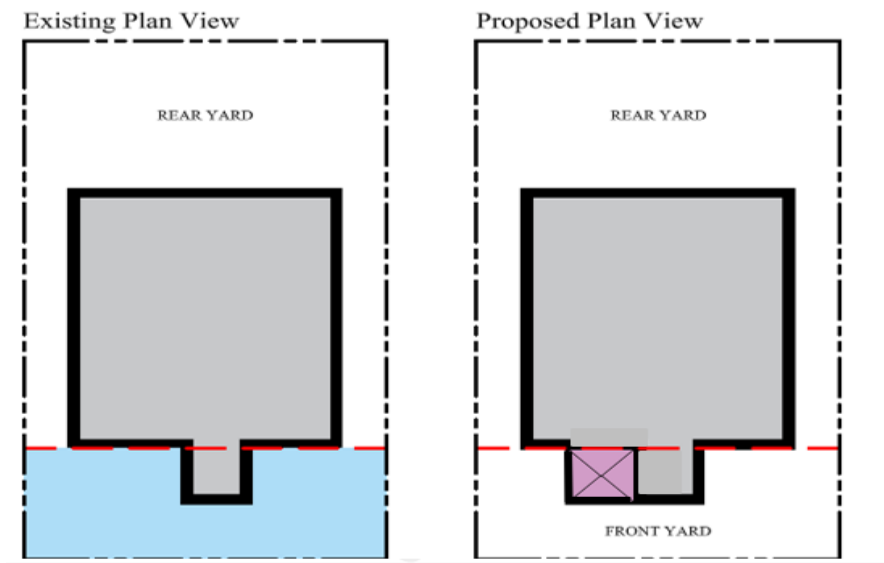
Existing Section View



Proposed Section View



- Lot Line
- Yard Lines & Height Limits
- Building Outline
- Existing Open Area
- New Stairs or Elevators 54-52
- Development as of Right
- Existing Building



ZR 54-52(c) calculation

- Existing building height of stories being accessed by elevator: 50ft
- Maximum height per ZR 54-52(c): 65ft.
- Proposed: 60 ft (<65ft, OK)

ZR 54-52 table for this element:

Accessibility Element	Applicable NYC Construction Code Section	Proposed Utilization and Applicable ZR 54-52 Section	Code Analysis
Elevator providing new access to Existing Building	BC 3002.1 BC 713.4	ZR 54-52(a) 600 sf additional ZFA ZR 54-52(b) 11.6% encroachment into Front Yard ZR 54-53(c) 15' above existing building height	Increase in Accessibility is achieved by voluntarily providing an elevator in accordance with BC 3002.1 and BC 713.4.