

Creating a Local Advisory Common on Regularriers to Afforcase Housing



U.S. Department of Housing and Urban Development
Office of Policy Development and Research

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Creating a Local Advisory Commission on Regulatory Barriers to Affordable Housing

September 1992

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INTRODUCTION

In its report to President Bush and U.S. Department of Housing and Urban Development Secretary Jack Kemp—"Not in My Backyard": Removing Barriers to Affordable Housing—the Advisory Commission on Regulatory Barriers to Affordable Housing urged local governments to undertake efforts to help the public become aware of the economic effects of regulations, of the need for regulatory reform, and of the value of affordable housing.

This guide is designed to assist local officials and others interested in improving housing affordability in their community. The guide suggests creating an advisory commission to explore how the local regulatory environment impacts housing costs. The guide is only that, a guide. It is neither exhaustive and to all situations. Most importantly, it is a manage for communities that are serious about a housing affordability.

And regulatory barriers is only one strategy and meny to consider when addressing affordable foosing. Alone, regulatory change may not a community's affordable housing needs. But heae needs will never be met without regulatory had be.

AT IS AL FORDABLE HOUSING?

Barriers to Affordable Housing reported that a housing affordability problem exists when a household earning 100 percent or less of area median income cannot afford to rent or buy decent quality housing without spending more than 30 percent of its income. Affordable housing can refer to rental or ownership housing. Affordable housing is sometimes thought of as low-income housing or subsidized housing. Although government affordable housing programs often set limits on income, costs to the resident, and the duration of affordability, not all affordable housing is government assisted.

For instance, one definition of affordable housing might be housing that can be purchased by people for a reasonable percentage of their income. A family with an "average income" should be able to afford an "average priced" home.

As housing costs have increased, many people who perform jobs vital to our communities have found that they cannot afford to live where they work. They include the teachers, police officers, firefighters, office workers, shopkeepers, and entry-level professionals we meet during our daily routines.

Take the time to learn about the affordable housing in your community. You should find most affordable housing to be a good neighbor and, perhaps, an all-too-scarce asset.

WHAT IS A REGULATORY BARRIER?

A ny local ordinance or policy that reduces the supply of housing will increase its cost. These regulations tend to be land-use and zoning issues. But local standards, fees, and review or approval procedures can also directly increase the cost and time it takes to develop, rehabilitate, or construct housing.

The regulatory issue is really about overregulation. There will probably be general agreement that overregulation is undesirable. However, what constitutes overregulation and, therefore, a regulatory barrier, may be hotly debated.

HOW CAN I TELL IF MY COMMUNITY HAS UNMET AFFORDABLE HOUSING NEEDS?

- The Comprehensive Housing Affordability Strategy (CHAS) or the Housing Element of the local General Plan indicates the affordable housing needs of the community exceed the available supply.
- Local housing prices or rents are higher than those in comparable jurisdictions.

- Employers report difficulty in finding and keeping qualified personnel partly because of high housing costs.
- Companies indicate they intend to relocate or plan their expansions outside your community due to the cost of housing.
- Local economic development has been frustrated by corporate concern over high housing costs.
- The jobs that are created in your community do not pay salaries that enable employees to afford housing stock in the community.
- Many employees in your local government and public schools have chosen not to live in your municipality because housing costs are too high.
- Families have found that their children, who are now young adults, are unable to live in the municipality or must continue living at home because housing costs are too high. Some must live in overcrowded situations.
- Local social service organizations report increased difficulty in finding housing for people of low and moderate income.
- Low vacancy rates for rental housing are common.

HOW DO I KNOW IF LOCAL REGULATIONS ARE CONTRIBUTING TO THE HOUSING AFFORDABILITY PROBLEM?

- City council and planning commission dockets are backlogged with development applications.
- Developers and municipal staff report increasingly long processing times for zoning, subdivision, and other applications.
- There is an insufficient supply of residentially zoned land.
- Developers indicate that even though the land may be appropriately zoned, the process is unpredictable. Localities may require fewer units, larger units, or more amenities rather than letting the market dictate the design.

- The development applications under consideration will not produce the number of housing units needed to meet demand.
- The proposed developments tend to address the needs of only the higher income households.
- Builders are unable to produce enough affordable housing for middle-income families.
- The community lacks a variety of housing types (for example, townhouses or multifamily structures as well as single-family detached houses) with a broad range of affordability. Developers claim this is a result of public policy, not the market.
- Realtors and developers report a shortage of buildable land served by water, sewers, and roads.
- Local building codes are not based on updated, nationally recognized model codes or are known to have costly, restrictive provisions.

WHY SHOULD A COMMUNICATION REMOVE BARRIERS TO AFFORDABLE HOUSING?

WHY SHOULD I CARE?

There are many good reasons why you could care about the lack of affordable houses stock, particularly if you live in one of the many communities where high housing demand is accompanied by high housing costs.

If you are a potential first-time homebuyer, chances are good that you have been priced out of the market. Nationally, it is possible for the "average income" family to buy the "average house." In some areas, however, fewer than 10 percent of the households can afford the "average house." The average age of first-time homebuyers is increasing, indicating that it is more difficult to afford a home and families must wait longer.

Your options as a first-time homebuyer are few, and none of them may be appealing. You can try to increase your income. You can dedicate a larger portion of your income to shelter instead of education, vacations, and other expenditures. You can

pay high rent, or you can "double-up" with family or friends.

If you are already a homeowner, you should care about the lack of affordable housing because your freedom to move, even to a smaller unit, may be severely hampered. Most people move an average of once every 5 years due to a change of job, changing family size, divorce, death of a spouse, or retirement. Even with substantial equity in your present home, could you afford the purchase and moving costs or would your mobility be impaired?

If you have grown children or aging parents, the lack of affordable housing may make it impossible for them to maintain a place of their own. Where are they going to live? With you?

If you are a completely satisfied renter, consider what high housing costs do to your rent. In most cities a vacancy rate of about 5 percent is considered healthy. With enough rentals available at any given time to be prices reasonable. Competition for these with as keen. Prices tend to reflect the higher constant auditing new apartments, which may be affects.

If you are corned about job opportunities, the construction of 1,000 new houses leads to 1,759 weak pairs of employment—and not just in the hor condition of Home Builders. Of those 1,759 worker years, 627 are in construction, 235 are in land development, and most importantly, the remaining 897 are in other industries, including manufacturing, wholesale trade, transportation, and other services. This does not include the jobs that go into making furnishings, appliances, and other items that may be purchased after completion of the housing unit.

If you are one of the many workers who cannot afford to live in or near the community in which you work, affordable housing is an issue that should be important to you.

If you are a businessperson, think about your employees who cannot buy homes at all, or who might not be able to live in or near the community in which your business is located. Think, too, about

the loss of revenue you suffer because the growth of your community and others where you do business might be stifled by high housing costs. New consumers for your goods and services are kept out. Current residents might not be able to buy as many of your goods and services because so much of their income is going toward housing.

If you are an environmentalist, think about the adverse impact on the environment when there is a lack of affordable housing. Freeways are gridlocked and air quality suffers as more people commute farther from their jobs to homes in affordable communities.

If you are a for-profit or nonprofit housing developer, think about the possibility of expanding your market or assisting more people. Consider the barriers that cause your costs to increase unreasonably. Often for-profit developers simply respond by decreasing densities, increasing the size of units, and adding amenities. This upscale housing, though more palatable to its neighbors, simply cannot address the affordability needs of the average person.

For nonprofits, increased costs usually mean securing additional funding from the locality or finding another funding source. In either case, removing barriers is an appropriate incentive the public sector can use to encourage private developers to build affordable housing.

If you are an elected official, you must be sensitive to the affordable housing needs in your community. Consider the loss of resources in a community that does not adequately address housing affordability. Wealth is literally transported from your municipality to one where affordable housing is available. The dollars a person earns in your community will be invested in the economy of another.

In some communities, a growing problem is that public-safety employees are unable to afford housing in the community where they are employed, delaying their ability to respond in emergency situations.

Think about the funding your municipality already devotes to addressing affordable housing needs.

If the regulatory barriers are removed, then perhaps these limited funds can be used to assist more families or enhance affordability for even lower income households. If regulatory barriers are removed, the cost savings may allow the private housing market to serve people the local government would otherwise have to assist.

ORGANIZING COMMUNITY SUPPORT

How many times have you asked, "What can I do?" or "Where do I start?" We all have a stake in making housing more affordable. We can join with others who recognize the need and begin to press for local review of the factors that add needlessly to the cost of housing. (See Appendix B, Item 3.)

Few industries have more potential for creating coalitions than the housing industry. Homebuilding links an immense number of businesses and organizations, all of which have an interest in the economic well-being of our communities. Despite this potentially broad-based support, successful coalition building still depends on the ability to (1) define the issue and its impact on the community, (2) identify potential supporters, and (3) communicate ideas correctly.

Community support for regulatory change can demonstrate to the public decisionmakers a genuine broad-based concern. This will help create the political will to examine the regulatory environment and its impact on the cost of housing. An advisory commission is an appropriate way for local government to respond to such concern.

WHY AN ADVISORY COMMISSION?

A commission brings together lots of expertise. Localities generally cannot afford all the consultants needed to generate the same amount of information. A community that identifies its own

obsolete or excessive requirements should be more likely to make the obvious and necessary changes. A commission can also provide an important support group for the resulting recommendations.

A commission is part of the community, yet separate from existing public bodies. It can gain a perspective on regulatory barriers without forfeiting the trust of the community. The local governing body may welcome the chance to have an outside group examine the complex issue of regulatory barriers.

ESTABLISHING THE COMMISSION

Once the local political body has decided to establish a commission on regulatory barriers to affordable housing, it must:

- Define the mission, scope, and goals of commission.
- Establish a timeframe for the commission complete its work. Usually 6 months show a enough. A year or less should be adequate a larger jurisdictions with complex development regulations.
- Determine the number of commissioners. Socially the size of a commission will range from \$25.25 commissioners, but it could be fewer. Lagger commissions can become unmanageable. Consider the size of the community and the number and complexity of issues that may be covered.
- Decide how commissioners are to be selected. Sometimes selections can be made from a list of nominees prepared by city staff or a nominating committee. Interest groups can submit lists of nominees. Self-nominations may be another source. Select experts, knowledgeable leaders, consensus builders, and good decisionmakers who are representative of and respected in the community. Make sure they can devote the necessary time to the work of the commission.
- Select commissioners. A single public announcement of the entire roster is usually best.
- Designate a chairperson and a vice chairperson.

- Assign staff to support the commission. Municipal staff will usually have the responsibility for actually writing the commission report.
- Commit to fully examining the recommendations of the commission.
- Insist on results.

GETTING STARTED

- Once the advisory commission has been established, it is important to:
- Seaffirm the goals of the commission and its deadlines.
- Emphasize the openness and fairness of the species and the commission's role as fact finder. That there may be differences of opinion as experts about what is a regulatory barrier above a particular regulation should be changed. The commissioners will be asked to sort through the information and make recommendations. In the cases where no consensus was reached, the species deserving more study.
- Remind the commissioners that the commission is to function only in an advisory capacity.
 - Establish a meeting schedule.
- dentify key issue areas (see also Appendix A).
 diese can include:
 - @ Growth controls.
 - Land use.
 - Zoning.
 - Subdivision ordinances.
 - Infrastructure.
 - Development standards.
 - Building codes.
 - Restrictions on manufactured housing, single-room occupancy, second units, etc.
 - Fire protection and sprinkler requirements.
 - Administrative procedures.
 - Processing times.
 - Fees and exactions.
 - Inspection procedures.

- Rent controls.
- Incentives for affordable housing.
- Review the CHAS or Housing Element of the General Plan (if the locality has either one). Pay particular attention to the sections on relevant public policies and constraints.
- Decide how and when to take public testimony.
- Identify interest groups and solicit their testimony. These can include:
 - Builders (both for-profit and nonprofit).
 - Affordable housing advocates.
 - Landowners.
 - Engineers.
 - Architects.
 - Lenders.
 - Housing manufacturers.
 - Housing managers.
 - Government officials.
 - Public safety officers.
 - Building, zoning, and public works officials.
 - Elected officials.
 - Employers.
 - Trade unions.
 - Legal aid and other public-interest law firms.
 - Planners (public and private).
 - Realtors.
 - Neighborhood organizations.
 - Environmental groups.
- Insist that witnesses and written testimony be as specific as possible. They should specifically identify the barrier, its impact (delay, cost, etc.), how it should (or should not) be changed, and why.
- Decide if working groups or subcommittees should be assigned specific tasks or subjects.
- Decide when additional commissioners are needed.
- Develop a thorough report on regulatory barriers to affordable housing and recommend appropriate changes.
- Take responsibility for and support the commission's report.

THE COMMISSION'S REPORT

The commission's report will represent months of work by the commissioners and support staff. The report to the local governing body should be an agenda for action. It will help if the report identifies (1) specific codes, standards, ordinances, administrative procedures, etc., and how they should be changed; (2) their effect and the desired result of the change; (3) the level of priority each recommendation should receive; and, if possible, (4) the city departments that would be responsible for administering the proposed changes.

RESULTS

The next step is to act on the commission's recommendations. The local governing body must (1) assign responsibility; (2) establish target dates for action; (3) develop, amend, and adopt appropriate ordinances, policies, or procedures.

Obviously, some of the proposed changes will be more controversial than others. Some may falter because of politics, personalities, or staff capacity. Commission members should help by supporting proposed changes throughout the process. The best results will probably be achieved when the commission can be chartered and the changes adopted between elections.

OVERCOMING THE FEAR OF CHANGE

E lected officials may fear that homeowners are or will be antagonistic to changed standards, possibly higher densities, or increased growth. In introducing new ideas to a suspicious world, sunset provisions, demonstration projects, and public education can be especially useful.

A sunset provision may allow elected officials who are uncertain about a proposed change in standards or procedures to vote for it on a trial basis. At the end of that time, the new policy may be extended or terminated. This technique eliminates the pressure of permanency, at least for a time.

A demonstration allows in a few developments for the actual construction of housing under modified standards. These serve as showcases for proposed changes. Cost differentials can be measured; consumer and general community reaction can be judged.

It may even be appropriate and necessary to undertake a public education program. Successful affordable housing projects can be showcased. Educational efforts can be focused by determining the specific fears of particular segments of the population through surveys and public meetings. Commission members should be counted on to assist in this effort (see Appendix B, Item 1).

Those who support regulatory barriers to affordable housing and oppose growth in their communities often have a narrow perspective or are misinformed about the impacts of these barriers. For example, many people mistakenly believe that affordable housing has detrimental effects on property values. Others fail to consider the adverse effects overregulation can have on economic growth. These beliefs need to be reexamined in light available evidence.

CONCLUSION

A community should continually work to that it is responding appropriately to its about able housing needs. Who will check to see if the changes are working? Will anyone notice if things slip back into "business as usual"? What other changes should be made? What is the affordable housing "pulse" of our community?

Perhaps it is best to view regulatory change as an ongoing process and not a single event. A jurisdiction can reconvene the commission or other group annually to review the status of policies and regulations affecting housing. Regulatory barriers, identified by the advisory commission, should also be pinpointed in the municipality's CHAS or Housing Element of the General Plan. But, most importantly, a community should be active in "cleaning its regulatory house" by actually removing barriers to affordable housing and preventing the imposition of new ones.

APPENDIX A

REGULATORY BARRIERS CHECKLIST _____

1.	In general, has the local government created an atmosphere receptive to affordable housing? Yes No		 b. Does the measure set the locality's new construction maximums above its new construction need? Yes No
Zoning and Ordinances2. Is all the land that will be required for residential			 c. Is the locality taking all reasonable and available steps to relieve the constraints that made growth limitation necessary? Yes No
	development over the next 5 years presently zoned and available for development? ☐ Yes ☐ No		Does the measure provide adequate incentives to encourage the development of housing affordable to low- and moderate-
3.	Does at least a third of the land zoned for residential purposes permit housing other than single-family detached houses? ☐ Yes ☐ No		income households consistent with the locality's share of the region's housing needs for all income levels? □ Yes □ No
4.	Do any of the residential districts in the zoning ordinary permit townhouses and multifamily housing the approval process? D Yes No		 e. Does the measure also equitably limit industrial and commercial development that may increase the need for housing? Yes No
5.	Do any to the ots that permit single-family detached using also permit attached housing.		 f. Is the growth-limitation measure conditioned to expire upon removal of the justifying constraint? Yes No
6.	□ Yes □ No Does the community encourage second unit development?	8.	Are planned unit development (PUD) or planned development ordinances available? □ Yes □ No
7.	☐ Yes ☐ No Has the local government adopted a growth control measure?	9.	Does flexible zoning allow mixed development? ☐ Yes ☐ No
	☐ Yes ☐ No	10.	Are standards based on performance? ☐ Yes ☐ No
	If yes:	11.	Are there provisions for zero-lot-line, clustering, and other innovative siting techniques? ☐ Yes ☐ No
	 a. Is the measure based upon actual and clearly defined environmental or public facility constraints (that is, limited sewer, water, or school capacity)? Yes No 	12.	Are standards relaxed for affordability? ☐ Yes ☐ No
		13.	Do regulations allow exchanging density for open space or other community amenities? ☐ Yes ☐ No

14.	Are density transfers permitted? ☐ Yes ☐ No	25.	Are less than 10 separate permits or approvals required to complete subdivision from initial application to occupancy of the dwelling?	
	Does the jurisdiction encourage the development of manufactured housing projects?		□ Yes □ No	
	☐ Yes ☐ No Does the jurisdiction permit the development of new single-room occupancy (SRO) housing? ☐ Yes ☐ No		Do subdivision or other standards allow normal residential streets to be less than 30 feet wide	
16.			(curb to curb)? □ Yes □ No	
17.	Does the community have a rent control ordinance? • Yes • No	27.	Do zoning and subdivision provisions allow clustering on reduced lots and to have reduced front, side, and rear yard requirements for single-family houses?	
18.	Does the community have a plan to phase out		☐ Yes ☐ No	
	rent control? ☐ Yes ☐ No	28.	Is one-stop processing available? ☐ Yes ☐ No	
Adı	ministration and Processing	29.	Is there a set time limit for the approval process?	
19.	Did less than half of the residential subdivisions approved last year require rezoning first? ☐ Yes ☐ No		☐ Yes ☐ No	
		30.	Are permit processing regulations clear? ☐ Yes ☐ No	
20.	Were more housing units approved for development than disapproved? ☐ Yes ☐ No	31.	Are plans reviewed simultaneously by the various government agencies or departments Yes No	
21.	Of the number of housing units originally proposed in rezoning or project application, were more than two-thirds approved for development?	32.	Are citizen review and hearing procedures well defined and timely? Yes No	
	☐ Yes ☐ No	33.	Are regulatory concessions or incentives	
22.	Does it take fewer than 6 months for most projects to be approved after the initial		offered to encourage affordable housing? ☐ Yes ☐ No	
	application (without considering rezoning)? ☐ Yes ☐ No	34.	Are there provisions for issuance of some building permits before final plan approval?	
	To obtain approval for development of other than single-family detached homes, does the normal procedure require less than two public hearings?	25	Yes No	
		33.	Are fees commensurate with local services? ☐ Yes ☐ No	
	☐ Yes ☐ No	36.	Can a plan offer the highest allowable density within the market strategy?	
	Do neighborhood or citizen's groups appeal less than 10 percent of the residential develop-		☐ Yes ☐ No	
!	ment application decisions of the zoning or subdivision administrators or of the planning		Are plans required to provide excessive off-street parking?	
	commission?		☐ Yes ☐ No	

instead of this-instead of this instead of th	38.	Are condominium standards for setbacks, landscaping, recreational vehicle storage, or parking ratios substantially stricter than those for apartments or single-family developments? — Yes — No	50.	Can sidewalks be located where people are likely to walk (playgrounds, bus stops, local markets, etc.) rather than conform to a rigid standard? • Yes • No	
Subcollector: ADT 501 to 1,000 Lane: ADT 201 to 500 Place: ADT 0 to 200 Place: ADT 0 t	39.	traffic (ADT) estimates? Arterial: ADT over 3,000	51.	(3 feet wide is adequate in most cases)	
40. Are pavement widths minimized according to ADT? Yes No Ye		Subcollector: ADT 501 to 1,000 Lane: ADT 201 to 500	52.	placement of both?	
40. Are pavement within himilinated according to ADT? Yes No	40		53.	•	
designed for residential traffic versus highway standards Yes No Yes No No Yes No Sign of the sections, etc.) designed for cost-effective sections, etc.) designed for realistic average daily demand (ADD) and peak us. [NOTE: Recent surveys indicate that actual usage is about half of old estimates. Also, smaller homes with smaller families use lever.] [NOTE: Recent surveys indicate that actual usage is about half of old estimates. Also, smaller homes with smaller families use lever.] [NOTE: Recent surveys indicate that actual usage is each tall of lever.] [NOTE: Recent surveys indicate that actual usage i	40.	to ADT?	54.	Is storm water regionally managed?	
42. Can utility addewalk easements be used instead of this-of-way? Yes No	41.	designed for residential traffic versus highway standards?	55.	versus underground closed systems?	
instead de-sacs? Yes No 1 Yes No 1 No 1 No 1 No 1 Yes No 1 No 1 No 1 No 1 No 1 Yes No 1 No 1 No 1 Yes No 1 No 1 Yes No 2 No 3 No 4 No 6	42.	Can utility sidewalk easements be used instead contisted instead and the sidewalk easements be used	56.	sections, etc.) designed for cost-effective storm water control?	
44. If cul-de cass are necessary, are required diameters reasonable? Yes No	43.	instead de-sacs?	57.	·	
 45. Are inverted crown streets allowed? Yes No No Yes No 	44.	If cul-demos are necessary, are required diameters reasonable?	58.	average daily demand (ADD) and peak usage? (NOTE: Recent surveys indicate that actual usage is about half of old estimates. Also,	
 46. Are curbs and gutters necessary? Yes No 17. If so, are one-piece rolled (mountable) curbs allowed? Yes No 48. Do standards say when sidewalks are not required? Yes No Yes No 18. No 49. If so, would one-side-only placement be adequate? 19. Can fire hydrants be located at maximum spacing for local fire-fighting equipment? Yes No 19. Can fire hydrants be located at maximum spacing for local fire-fighting equipment? Yes No 19. If actual usage is less than the system is designed for, is this taken into account in infrastructure replacement planning? Yes No 19. Are "blow-offs" used for flushing water mainstead of hydrants? Yes No 19. No 19. Ves No 19. No 	45.			water.)	
allowed? Yes No No No Standards say when sidewalks are not required? Yes No No No 1 Yes No No No 1 Yes No No No 1 Yes No No No No No 1 Yes No No		☐ Yes ☐ No	59.	Can fire hydrants be located at maximum	
 □ Yes □ No designed for, is this taken into account in infrastructure replacement planning? □ Yes □ No □ Yes □ No 61. Are "blow-offs" used for flushing water mainstead of hydrants? □ Yes □ No □ Yes □ No ○ Yes □ No 	47.		60		
required?			60.	designed for, is this taken into account in	
49. If so, would one-side-only placement be adequate? Are blow-ons used for flushing water flus	48.				
adequate? □ Yes □ No			61.		
□ Yes □ No	49.	• •			
		□ Yes □ No			

62.	Can more than one unit be served by the same tap? ☐ Yes ☐ No	75.	Has the community adopted modifications to the model code? ☐ Yes ☐ No
63.	Can water supply systems be placed in easements instead of rights-of-way?		Is building code performance-based? ☐ Yes ☐ No
64.	☐ Yes ☐ No Are sanitary sewers designed for peak flows? (NOTE: If water supply system can be downsized, then sanitary sewer system might		Can footings and foundations be designed to actual soil-bearing capacity? ☐ Yes ☐ No Can welded wire mesh be eliminated in
	be downsized.) ☐ Yes ☐ No	, 0,	concrete flatwork? (Under normal conditions welded wire mesh serves no significant
65.	Are curvilinear designs allowed? ☐ Yes ☐ No		function.) □ Yes □ No
66.	Can plastic sewer pipe be used? ☐ Yes ☐ No	79.	Can floor bridging be eliminated? ☐ Yes ☐ No
67.	Is manhole spacing maximized for modern cleanout equipment (rather than 300 feet)? Yes No	80.	Can individual plumbing fixture shut-off valves be eliminated? ☐ Yes ☐ No
68.	Are cleanouts allowed instead of manholes? ☐ Yes ☐ No	81.	Is plastic water supply pipe approved? ☐ Yes ☐ No
69.	Can sanitary sewer be placed in the same trench with other utilities?	82.	Is plastic drain, waste, and vent pipe allowed? ☐ Yes ☐ No
70.	☐ Yes ☐ No Can sanitary sewer be placed in easements instead of rights-of-way?		Can stack venting be used? Yes No
71.	☐ Yes ☐ No Can electric, gas, cable television, and telephone be placed in a common trench?	04.	Can electrical outlets be placed according to potential use instead of by prescribed standard spacing? • Yes • No
72.	☐ Yes ☐ No Are house setbacks reasonable? (Setbacks	85.	Can plastic electrical device boxes be used? ☐ Yes ☐ No
	from rights-of-way are often excessive. If easements are used instead of rights-of-way, setbacks can be measured from back of the curb or from the street edge.)	86.	Are fire sprinklers required by local ordinance that are not required by model codes? ☐ Yes ☐ No
73.	☐ Yes ☐ No Are small lots with narrow frontages allowed?	87.	Does the community allow alternatives to fire sprinklers?
, 0.	☐ Yes ☐ No	00	☐ Yes ☐ No
Building Construction		ω.	Does the jurisdiction allow trade-offs when fire sprinkling is provided? ☐ Yes ☐ No
74.	Has the community adopted the appropriate model code according to State law? ☐ Yes ☐ No		□ Yes □ No

APPENDIX B

ADDITIONAL RESOURCES.

- "Not In My Back Yard": Removing Barriers to Affordable Housing
- Regulatory Barriers to Affordable Housing— A Resource Guide
- Building Better Communities Through Regulatory Change
- Affordable Residential Land Development:
 A Guide for Local Government and Developers
- 5) Affordable Residential Construction: A Guide for Home Builders
- 6) Affordable Housing Development Guidelines for State & Local Government

These and other comments are available at a nominal cost and HUD USER, P.O. Box 6091, Rockville, ME 60, 1–800–245–2691.

Additional information is available from the Regulatory Reform for Affordable Housing Information Center (RRAHIC), sponsored by the U.S. Department of Housing and Urban Development (HUD), Office of Policy Development and Research.

HUD created the Information Center to assist State and local governments in their efforts to eliminate needless regulations and to expand housing opportunities for millions of American families. RRAHIC disseminates information on successful regulatory reform, offers technical assistance, maintains a database containing information on exemplary programs and relevant literature, and provides reference and referral services. Contact the Information Center at 1–800–36–NIMBY (1–800–366–4629).

APPENDIX C

RESOURCE ORGANIZATIONS

American Institute of Architects (AIA)

1735 New York Avenue NW. Washington, DC 20006 (202) 626–7300

American Planning Association (APA)

1313 East 60th Street Chicago, IL 60637–2891 (312) 955–9100

Center for Real Estate and Urban Economics Institute of Business and Economic Research University of California

2680 Bancroft Way, Suite A Berkeley, CA 94720 (415) 643–6105

Center for Urban Policy Research Rutgers—The State University

P.O. Box 489 Piscataway, NJ 08855–0489 (201) 932–3101

Claremont Institute

4650 Arrow Highway, Suite D6 Montclair, CA 91763 (714) 621–6825

Conservation Foundation

P.O. Box 4866 Hampden Station Baltimore, MD 21211 (410) 338–6951

Council of State Community Development Agencies Hall of States

444 North Capitol Street NW., Suite 251 Washington, DC 20001 (202) 393–6435

HUD Library

U.S. Department of Housing and Urban Development

451 Seventh Street SW., Room 8141 Washington, DC 20410 (202) 708–3180

HUD USER

P.O. Box 6091 Rockville, MD 20850 (301) 251–5154 • (800) 245–2691

International City Management Association (ICMA)

777 North Capitol Street NW., Suite 500 Washington, DC 20002 (202) 289–4262

Lincoln Institute of Land Policy

26 Trowbridge Street Cambridge, MA 02139 (617) 253–4373

National Association of Home Builders (NAHB)

15th and M Streets NW. Washington, DC 20005 (800) 368–5242

National Association of Home Builders (NAHB)

National Research Center 400 Prince Georges Boulevard Upper Marlboro, MD 20772-8731 (301) 249-4000

National Council of State Housing Agencies (NCSHA)

444 North Capitol Street NW., Suite 412 Washington, DC 20001 (202) 624–7710

National Governor's Association

444 North Capitol Street NW., Suite 250 Washington, DC 20001 (202) 624–5300

Urban Institute

2100 M Street NW. Washington, DC 20037 (202) 833–7200

Urban Land Institute (ULI)

625 Indiana Avenue NW., Suite 400 Washington, DC 20004 (202) 624–7000

Virginia Center for Housing Research Virginia Polytechnic Institute and State University

404 Clay Street Blacksburg, VA 24061–0539 (703) 231–3993

Regulatory Reform for Affordable Housing Information Center

P.O. Box 6091 Rockville, Md 20850