

LYNN'S CARE VILLAGE ASSOCIATION, INC.

po box 10215.raleigh.north carolina.27605

phone:919.621.9670/fax:919.516.0796

email: lynnscareshomes@gmail.com

November 14, 2024

To Whom It May Concern:

This letter is to comment on rules cited in *10A NCAC 13G, Licensing of Family Care Homes* by section *Pursuant to G.S. 150B-21.3A, Periodic Review and Expiration of Existing Rules*

3 Proposed change/comment sections:

current rule area: 10A NCAC 13G .0403 QUALIFICATIONS OF MEDICATION STAFF

(b) Medication aides and their direct supervisors, except persons authorized by state occupational licensure laws to administer medications, shall successfully pass the written examination within **60** days after successful completion of 12 the clinical skills validation portion of a competency evaluation according to Rule .0503 of this Subchapter

proposed rule:

(b) Medication aides and their direct supervisors, except persons authorized by state occupational licensure laws to administer medications, shall successfully pass the written examination within **120** days after successful completion of 12 the clinical skills validation portion of a competency evaluation according to Rule .0503 of this Subchapter

rationale: since the pandemic and increasing staffing issues it has become harder to find currently qualified state medication aides that have already completed some or all of the states training and testing requirements in this area prior to hire. Additionally with the move of the state exam to the online Credentia platform it has become much more challenging for the less experienced medication staff as well as less tech savvy staff to complete this exam with confidence as well as more difficult to locate and engage qualified nurse instructors in this area as well. Increasing this test allowance would be beneficial to both the staff testing as well as the family care home in giving them more time to be trained longer and be made more comfortable testing on an online platform which is often taking more than one try due to the learning curve of the added and sometimes confusing testing portal

current rule areas:

10A NCAC 13G .1701(a) INFECTION PREVENTION AND CONTROL POLICIES AND PROCEDURES, 10A NCAC 13G .1604 (c)(1) RATING CALCULATION

proposed rule:

on or after the effective date of this Rule, if the family care home installs a clean air system in compliance with the federal Centers for Disease Control and Prevention (CDC) published guidelines on infection prevention and control, the facility shall receive 3 merit points. If the facility has an existing clean air system, the facility shall receive 2 merit points for subsequent ratings for maintaining the clean air system in good working order

rationale:

in March of 2002 the Environmental Protection Agency (EPA) published a best practices guide for improving indoor air quality and reducing the risk of spreading dangerous airborne particles as part of *The Clean Air in Buildings Challenge* which is a call to action for organizational leaders and building owners and operators of all types to assess their indoor air quality and make ventilation, air filtration, and air cleaning improvements to help keep building occupants safe including the use of clean air systems containing ionizing technology. See attached performance data to support the benefits of such systems in health care facilities including family care homes as well as referenced EPA *Clean Air in Buildings Challenge* Publication. Implementing clean air procedures is also consistent with the federal Centers for Disease Control and Prevention (CDC) published guidelines on infection prevention and control as indicated on their website www.cdc.gov.

current rule areas:

10A NCAC 13G .0204 (b)(2) APPLYING FOR A LICENSE TO OPERATE A HOME NOT CURRENTLY LICENSED

(2) an approval letter from the local zoning jurisdiction for the proposed location;

10A NCAC 13G .0303 (a) LOCATION

(a) A family care home shall be in a location approved by local zoning boards

proposed rule:

omit the requirement for an approval letter from the local zoning jurisdiction for the proposed location of a North Carolina family care home under these current rule sections as cited above

rationale: with the recent growing density changes, amended property development allowances, approvals and permissions from local governments in the state of North Carolina for alternate uses of single family lots including air b and bs, "lot hacking" including the ability to subdivide lots which add additional single family and flag lots as well as to add additional single and multi family units, triplexes, tiny houses, mini apartment buildings, rezoning allowances, ADU's and NC DHHS's allowance of only Multi-unit Assisted Housing with Services (MUAHS) facilities registration without distance requirements from other supportive housing units on what was only allowed on existing single family lots at one time makes distance requirements from another supportive housing unit for a family care home license to be required for licensure consideration to now more than ever be discriminatory and should be omitted completely from *10A NCAC 13G, Licensing of Family Care Homes* and no longer required in order to offer fair, equal and integrated supportive housing for all of our states disabled and aged who need assistance with daily living not just select groups. In the current onslaught of our country's and state's aging population in desperate need of good facilities to help them meet their most basic needs and no availability of any new certificates of need to build other types of residential options we owe it to our senior especially as well as all of our state's growing disables population to live and receive care wherever is best for them not where their municipality allows them. This distance restriction is a clear violation of both the Federal Americans with Disabilities and Federal Fair Housing Acts and needs to be removed from rules that serve to advocate for our disabled and aging population not make it harder for them to receive the residential care that they need so much. Reference of City of Raleigh's Unified Development Ordinance amendment summary of over 13 new residential property allowances and density changes report included from www.raleighnc.gov.

current rule area:

10A NCAC 13G .0316 (f) FIRE SAFETY AND DISASTER EMERGENCY PREPAREDNESS PLAN

(f) A written disaster plan which has the written approval of, or has been documented as submitted to, the local emergency management agency and the local agency designated to coordinate special needs sheltering during disasters, shall be prepared and updated at least annually and shall be maintained in the home. This written disaster plan requirement shall apply to new and existing homes.

proposed bulletin rule:

Each facility shall develop and implement an emergency preparedness plan to ensure resident health and safety and continuity of care and services during an emergency.

suggested rule:

The facility shall use the assessment instrument and instructional manual established by the Department or an instrument developed by the facility that contains at least the same information as required on the instrument established by the Department of the extended approved requirements for a family care home's new emergency preparedness plan requirement being proposed. The assessment shall be completed in accordance with the rule of this Subchapter

rationale:

as many family care homes do not employ policy writers and family care homes are not required to employ emergency management and preparedness professionals it would pose very difficult for a facility to meet this requirement without the resources to do so. For this reason the Department should be responsible to provide these resources through documentation templates, training classes and local assistance for family care homes to complete this new plan requirement.

If you have any questions please feel free to contact me at the contact information above.

Thank You for your time and consideration

Ann Marie Cassella



President

Lynn's Care Village Association, Inc

Administrator/Owner/Operator

Lynn's Care Home at Riverside, LLC

Lynn's Care Home at Sandy Forks, LLC

Owner

Quality Care Home Consulting, LLC

Program Provider/Preceptor

NC Approved 120 Family Care Home Administrator in Training Program and Preception

Clean Air in Buildings Challenge

U.S. ENVIRONMENTAL PROTECTION AGENCY

MARCH 2022

This document provides basic principles and general actions recommended to improve [indoor air quality](#) (IAQ) in buildings and reduce the risk of airborne spread of viruses and other contaminants. These actions, as well as technical assistance and tools provided through the links, are intended to support building owners and operators, as well as organizational leaders and decision makers, to make ventilation and other IAQ improvements.

Infectious diseases like COVID-19 can spread through the inhalation of airborne particles and aerosols. In addition to other layered prevention strategies, taking actions to improve IAQ can reduce the risk of exposure to particles, aerosols, and other contaminants, and improve the health of building occupants. None of these actions will eliminate risk completely, and building owners and operators may not need or be able to take all actions listed below. The best combination of actions for a building will vary by space and location. When determining which actions to take to help protect occupants, building owners and operators should consider, for example, public health guidance, who and how many people are in the building, the activities that occur in the building, outdoor air quality, climate, weather conditions, and the installed heating, ventilation, and air conditioning (HVAC) equipment. Some actions may increase energy consumption and may be more appropriate as temporary measures when disease transmission is higher. Building owners and operators should engage experts, facilities managers, and others who are skilled, trained, and/or certified in HVAC work to develop and implement plans to improve IAQ and manage air flows. [Individual actions](#) and layered prevention strategies remain important measures for reducing the spread of viruses.

[American Rescue Plan](#) and [Bipartisan Infrastructure Law](#) funds can be used to supplement investments in ventilation and IAQ improvements in public settings.



1. CREATE AN ACTION PLAN FOR CLEAN INDOOR AIR IN YOUR BUILDING(S) that assesses IAQ, plans for upgrades and improvements, and includes HVAC inspections and maintenance.

- Determine how clean outdoor air is brought into the building and distributed to all occupied spaces. Understand and document how HVAC systems work for your building.
- Work with an HVAC expert to assess and inspect systems for ventilation, filtration, and air cleaning. Verify through [commissioning, testing, and balancing](#) that building systems are functioning as designed.
- Implement other IAQ assessment approaches such as carbon dioxide (CO₂) monitors as needed.
- Determine how much clean air (outdoor air + filtered HVAC recirculation air) is needed and verify or measure air delivery for each room or space.
- Assess if you need to manage the direction of air flows in higher risk areas of your building (e.g., in a school nurse's office).
- Create an IAQ action plan that includes regular inspections and maintenance, including filter replacements, and HVAC system upgrades or improvements, as needed.
- Support the people who operate or help with building and air distribution systems by providing [continuing education and training](#).



2. OPTIMIZE FRESH AIR VENTILATION by bringing in and circulating clean outdoor air indoors.

- Ensure [outdoor air](#) is acceptably clean or is adequately filtered as it is brought into the building.
- Properly use [economizers](#), which are devices that supplement mechanical cooling with fresh air, to efficiently and cost effectively increase fresh air ventilation.
- Run HVAC systems during all occupied hours to ensure clean air enters and is distributed throughout the building.
- Ensure that exhaust fans in bathrooms are functioning, and set fans to run during occupied hours.
- Increase volume of clean, outdoor air at times of higher risk (e.g., at times of elevated risk of COVID-19):
 - [Adjust HVAC settings](#) while considering thermal comfort, humidity, outdoor air quality, and energy use.
 - Consider [running the HVAC system](#) to refresh air before arrival and/or remove remaining particles at the end of the day (e.g., 1-2 hours before/after the building is occupied), as needed.
 - Check with an HVAC expert to understand the maximum outdoor air your system can support.
- Open operable windows, as weather, outdoor air quality, occupant safety, and HVAC systems permit. To the extent possible, enable cross ventilation by opening windows and doors at opposite sides of the room or building. (Note: Opening windows while running HVAC systems may increase energy costs or introduce other air contaminants.)



3. ENHANCE AIR FILTRATION AND CLEANING using the central HVAC system and in-room air cleaning devices.

- Install properly sized [MERV-13](#) air filters or the highest rated MERV filters that the HVAC system can accommodate.
- Close off any gaps around air filters to minimize air moving around them instead of through them.
- Use [portable air cleaners](#) to increase air cleaning rates in areas where air flow and central filtration are insufficient:
 - Select devices that are appropriately [sized for the space](#) in which they will be used. Consider [ENERGY STAR](#) certified products. If noise is a consideration, look for a product with lowest perceived sound levels.
 - As a temporary measure, [do-it-yourself air cleaners](#) can also be built from HVAC filters and box fans.
- Increase ventilation and/or filtration in areas with higher emission of airborne particles and aerosols (e.g., gyms, cafeterias, or choir/music rooms at schools). You can make adjustments for these areas by:
 - Increasing the volume of clean, outdoor air delivery.
 - Using portable air cleaners.
 - Setting up extra exhaust ventilation to move air directly to the outside.
- Consider an upper-room [Ultraviolet Germicidal Irradiation \(UVGI\)](#) system to clean the air. (UVGI systems require professional design and installation, in consultation with experts.)



4. GET YOUR COMMUNITY ENGAGED IN YOUR ACTION PLAN by communicating with building occupants to increase awareness, commitment, and participation in improving indoor air quality and health outcomes.

- Communicate to affected people (e.g., building occupants, workers, students, teachers, and parents) about how the [action steps](#) you are taking will improve indoor air quality and reduce disease transmission in your building.
- Show your work by hosting building walkthroughs, posting descriptive signage, or communicating on social media. Demonstrate the importance of individual actions to ensure facility operations are optimal (e.g., keeping ventilation systems clear of clutter).
- Provide feedback mechanisms such as maintenance requests to identify repair issues and surveys to gather perspectives from your community.
- Remember [individual actions](#) and layered prevention strategies remain important measures for reducing the spread of viruses like COVID-19.

ADDITIONAL RESOURCES

Clean Indoor Air Resources

Indoor Air Quality

<https://www.epa.gov/indoor-air-quality-iaq>

Indoor Air and Coronavirus (COVID-19)

<https://www.epa.gov/coronavirus/indoor-air-and-coronavirus-covid-19>

Ventilation and Coronavirus (COVID-19)

<https://www.epa.gov/coronavirus/ventilation-and-coronavirus-covid-19>

Air Cleaners, HVAC Filters, and Coronavirus (COVID-19)

<https://www.epa.gov/coronavirus/air-cleaners-hvac-filters-and-coronavirus-covid-19>

Interactive Ventilation Tool

<https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/interactive-ventilation-tool.html>

Indoor Air Quality Scientific Findings Resources Bank

<https://iaqscience.lbl.gov/>

Ventilation in Buildings

<https://www.cdc.gov/coronavirus/2019-ncov/community/ventilation.html>

Ventilation in the Workplace

<https://www.osha.gov/ventilation>

Improving Indoor Ventilation During Cold Weather

<https://www.osha.gov/sites/default/files/publications/OSHA4172.pdf>

COVID-19 Guidance on Ventilation in the Workplace

<https://www.osha.gov/sites/default/files/publications/OSHA4103.pdf>

ASHRAE Epidemic Task Force, Core Recommendations

<https://www.ashrae.org/file%20library/technical%20resources/covid-19/core-recommendations-for-reducing-airborne-infectious-aerosol-exposure.pdf>

Resources for Schools

Creating Healthy Indoor Air Quality in Schools

<https://www.epa.gov/iaq-schools>

Efficient and Healthy Schools Campaign

<https://efficienthealthyschools.lbl.gov/>

Efficient and Healthy Schools Website

<https://www.energy.gov/eere/buildings/efficient-and-healthy-schools>

ASHRAE Epidemic Task Force Guidance for Schools and Universities

<https://www.ashrae.org/file%20library/technical%20resources/covid-19/ashrae-reopening-schools-and-universities-c19-guidance.pdf>

Resources for Building Professionals

Indoor Air Quality Master Class Professional Training Webinar Series

<https://www.epa.gov/iaq-schools/indoor-air-quality-master-class-professional-training-webinar-series>

Indoor Air Quality in Offices and Other Large Buildings

<https://www.epa.gov/indoor-air-quality-iaq/indoor-air-quality-offices-and-other-large-buildings>

Better Buildings Resource Center: Building Operations during COVID-19

<https://betterbuildingssolutioncenter.energy.gov/covid19>

ASHRAE Indoor Air Quality Guide

<https://ashrae.org/iaq>

ASHRAE Epidemic Task Force Guidance for Commercial Buildings

<https://www.ashrae.org/file%20library/technical%20resources/covid-19/ashrae-commercial-c19-guidance.pdf>

FRESH-AIRE UV®

APCO®

WHOLE-HOUSE AIR PURIFIER

DETOX THE AIR



APCO's unique combination of UV-C light and activated carbon achieves unmatched microbial and odor reduction without producing any harmful ozone. APCO is particularly effective at reducing odor-causing volatile organic compounds (VOCs) which include toxic chemical vapors like formaldehyde and toluene.

APCO® is installed in the duct work of the central air system so it can remove airborne contaminants as they pass by.

FEATURES

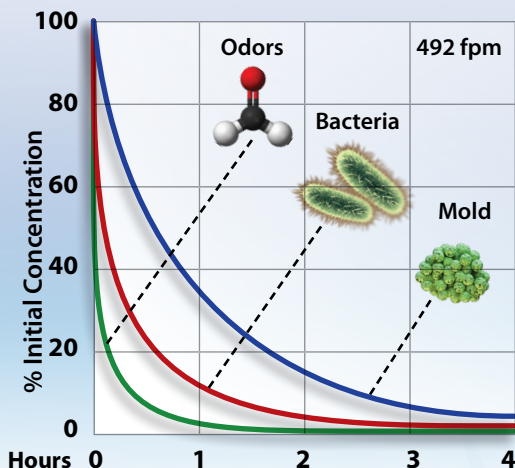
- Duct-mounted
- Easy to install
- Lifetime carbon cells
- Ozone-free
- Lifetime warranty

BENEFITS

- Whole-house air purification
- Neutralizes odors & toxic VOCs
- Sterilizes mold, bacteria, viruses, allergens
- Improves indoor air quality
- Inhibits mold growth in HVAC system



APCO® % Reduction of Common Indoor Air Contaminants Over 4 Hours

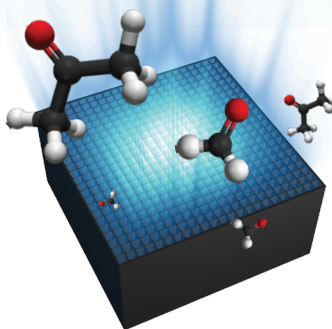


Laboratory studies show that after just a few hours of operation APCO® significantly reduces the most common forms of indoor air pollution*

* Visit www.freshaireuv.com/apco.html for more information

ENTER THE MATRIX

At the heart of APCO® is a matrix of activated carbon cells. These cells attract and holds odors and microbes which are then catalyzed by exposure to UV light. The cells are self-cleaning and the system is virtually maintenance-free.

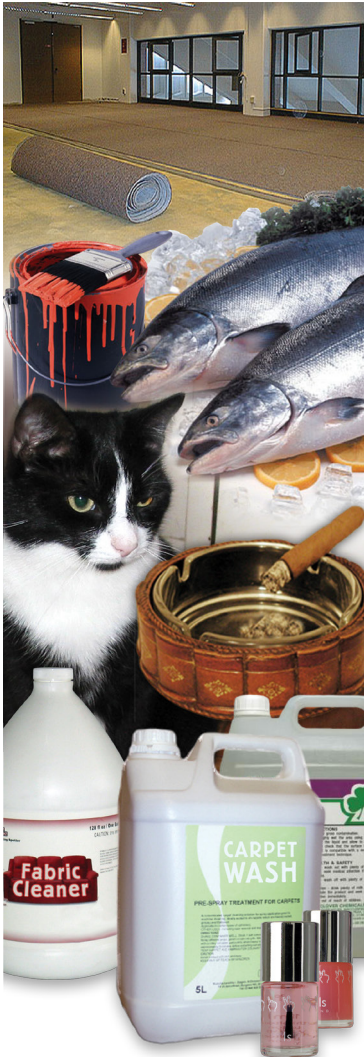


INDOOR AIR QUALITY

Indoor air pollution is often five times worse than outdoor air pollution. The unique design of APCO® addresses both biological and chemical contaminants in indoor air.

APCO® is especially effective against potentially toxic Volatile Organic Compounds (VOCs) which are the source of nearly all bad smells. APCO® also sterilizes microbes as they pass by in the air stream. The result is cleaner, healthier, fresh smelling indoor air.

The Solution is APCO® ...



ODORS & VOCs

- Tobacco Smoke
- Pet Odors
- Cooking Smells
- Building Materials
- Flooring & Carpets
- Paints & Solvents
- Cleaning Chemicals
- Gas & Oil Fumes

BIOLOGICAL

- Mold
- Bacteria
- Viruses
- Allergens

Specifications	
UV Lamp	254 NM germicidal UV-C, quartz hot filament
Dimensions	Cell & Lamp: 5.8"W x 3.25"H x 13.2"D Enclosure: 7.6"L x 7.6"W x 2.2"D
ER models Electrical	18-32 VAC, 60 Hz, 0.68 Amps, 16 VA
SI DI models Electrical	120-277 VAC, 50/60 Hz, 0.51 Amps/120V Thru 0.22 Amps/277V
Pressure Drop	<0.01" w.c. @ 400 FPM
Warranty	Lifetime for all parts except lamp

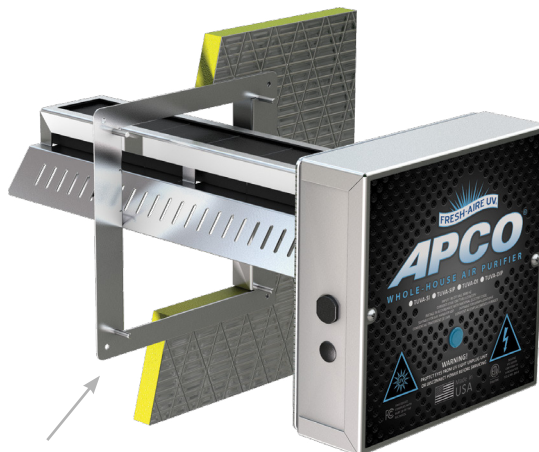
Part Numbers		
18-32 VAC		Replacement Lamp
TUV-APCO-ER	1 Year Lamp	TUVL-115
TUV-APCO-ER2	2 Year Lamp	TUVL-215
18-32 VAC with 2nd UV Lamp for Coils		Replacement Lamps
TUV-APCO-DER	1 Year Lamp	TUVL-115 & TUVL-115P
TUV-APCO-DER2	2 Year Lamp	TUVL-215 & TUVL-215P
120-277 VAC		Replacement Lamp
TUV-APCO-SI*	1 Year Lamp	TUVL-115
TUV-APCO-SI2*	2 Year Lamp	TUVL-215
120-277 VAC with 2nd UV Lamp for Coils		Replacement Lamps
TUV-APCO-DI*	1 Year Lamps	TUVL-115 & TUVL-115P
TUV-APCO-DI2*	2 Year Lamps	TUVL-215 & TUVL-215P



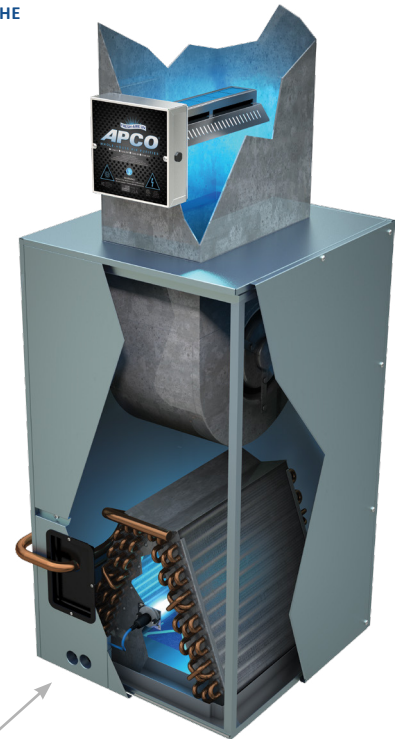
THIS DEVICE COMPLIES WITH PART 18 OF THE FCC RULES.

* For wall plug add -P to part number
Example: TUV-APCO-SI-P

LIFETIME WARRANTY
ALL PARTS EXCEPT LAMPS



New mounting plate with bending tabs makes duct board installation quick & easy!



APCO® Dual installed in Air-handler



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Made in USA



PERFORMANCE DATA

iWave and NuShield products are designed to work with air handling systems to deliver the benefits of ionization. These tests measure the reduction of certain viruses and bacteria through a combination of in-air testing and surface testing. Measurements of the specimen are taken at regular intervals and compared to a control without the introduction of ionization. All tests were run using proprietary NPBI technology and conducted in third party laboratories.

AIRBORNE ORGANISMS: These ionization tests measure the reduction of certain airborne viruses and bacteria by aerosolizing a test specimen into a large biosafety test chamber (BSL2 or BSL3) and suspending it in the air using mixing fans. Measurements of the specimen are taken at regular intervals and are compared to a control without the introduction of ionization.

SPECIMEN	AVG. ION DENSITY (NEGATIVE IONS/CC)	% NET REDUCTION	
		30 MIN.	60 MIN.
SARS-CoV-2	-10,000	40.78%	90.87%
	-18,000	65.38%	98.33%
SARS-CoV-2 Delta	-22,000	54.04%	98.70%
Influenza A	-22,000	43.13%	84.53%
Influenza B	-22,000	32.71%	83.93%
RSV	-22,000	49.52%	94.71%

SURFACE ORGANISMS: These ionization tests measure the reduction of certain airborne viruses and bacteria on surfaces by applying a specimen to glass slides, petri dishes or coupons and placing them within a large biosafety test chamber (BSL2 or BSL3). Measurements of the specimen are taken at regular intervals and are compared to a control without the introduction of ionization.

SPECIMEN	AVG. ION DENSITY (NEGATIVE IONS/CC)	% NET REDUCTION	
		30 MIN.	60 MIN.
SARS-CoV-2	-9,700	55.50%	62.85%
	-10,250	55.94%	70.71%
	-20,600	97.90%	99.97%
	-23,600	98.49%	99.98%
Staphylococcus aureus	-14,000	36.61%	91.55%
E.coli	-14,000	31.46%	86.36%
MRSA	-14,000	44.91%	87.87%

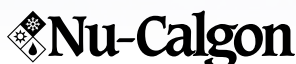
AIRBORNE PARTICLES: Test results demonstrate the additional reduction of particles in the air when NPBI is combined with mechanical filtration versus filtration alone. Particles from calibrated cigarettes were infused into a 10ft. x 10ft. x 10ft. chamber to simulate wildfire smoke. Testing occurred at six air changes per hour (ACH), consistent with ASHRAE guidelines.

CHANGE IN REMOVAL RATE OF PM2.5 AT 6 ACH (NPBI + MERV 8 VS. MERV 8 ALONE)		CHANGE IN REMOVAL RATE OF PM2.5 AT 6 ACH (NPBI + MERV 10 VS. MERV 10 ALONE)	
Test Duration in Hours	Average (12,060 ions/cc)	Test Duration in Hours	Average (10,640 ions/cc)
1	2.26x	0.5	1.51x
2	2.11x	1	1.56x
NPBI + MERV 8 removed PM2.5 twice as fast as MERV 8 alone.		NPBI + MERV 10 removed PM2.5 over 1.5 times faster than MERV 10 alone.	

NuShield has earned UL's stringent Zero Ozone Emissions Certification.

UL Certification	Standards	NuShield Model	
UL 2998	Certified to not introduce more than five parts per billion of ozone.	NuShield-R	4900-60
		NuShield-CI	4900-50
		NuShield-CX	4900-55

Visit www.nushieldair.com for full performance data, including testing parameters, reduction rates and data related content. Locations will vary, and clients should evaluate their individual application and environmental conditions when making an assessment regarding the technology's potential benefits. NuShield products are not marketed as, nor cleared, by the FDA as medical devices.





Zoning Changes and Housing Choices

How Raleigh is Addressing the Missing Middle By Increasing Housing Options and Affordability

Updated: Dec 7, 2023

Jump To:

[Housing Affordability in Raleigh](#)
[How Do Text Changes Affect Housing Choices](#)
[Sustainability](#)

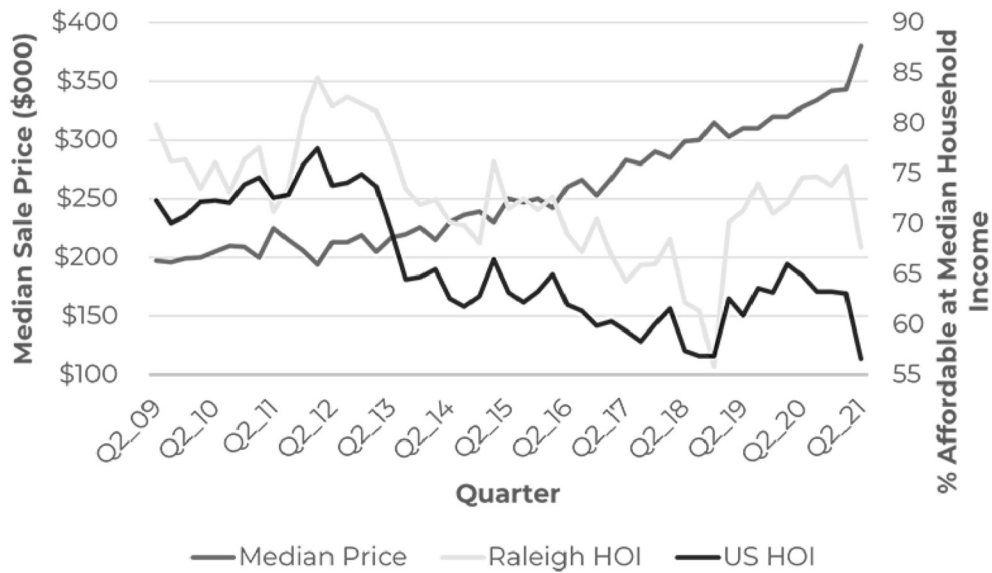
Missing middle housing is important because it's more accessible and often more affordable than housing a single family. This makes it accessible to more people and households. It also suits families at all points in life that may not want or be able to maintain a single-family house. This includes young single residents or unmarried partners and retirees with limited mobility. Missing middle housing is also more energy efficient, creates better conditions for high quality transit, and encourages walking.

One of the main drivers of the high cost of housing in Raleigh is that there are too few housing units available for the demand to live in our community. Raleigh is one of the most attractive and fastest growing cities in the Country, and a lot of new residents bring more wealth and income than existing Raleighites. If we don't find ways to create more housing supply, many existing Raleighites will be outcompeted for housing opportunities and housing prices will continue to rise significantly.

Housing Affordability in Raleigh



HOUSING OPPORTUNITY INDEX



Over 33% of households in Raleigh are “cost-burdened “or “severely cost-burdened.” This means that families are spending 30% or more of their gross income on housing costs every month. While housing has become expensive for many reasons, including high land costs, higher interest rates, and high material/labor costs, restrictive zoning regulations have also had an impact by shrinking the supply of available homes.

Prior to the recent text changes, over 50% of the city prohibited multi-family housing. The Great Recession, fueled by faulty mortgages and speculative construction, further exacerbated the housing shortage.



In restricting the types of housing that could be built, the City’s old zoning regime incentivized the creation of large single-family homes, limiting the number of new units available for our growing population. Popular neighborhoods will continue to command high prices, but housing types such as duplexes, townhouses, triplexes, quadplexes, and garden apartments allow these costs to be spread over more units, often with smaller floor areas.



An example is the Yarborough Park development in Mordecai. Primarily a townhouse development, it also includes two single-family lots at the entrance. The single-family homes are assessed at over \$600,000—the townhouses behind, about half of that.

If households cannot find housing they can afford in their preferred neighborhood, they will look for housing in other nearby neighborhoods with lower price points. This will drive up prices in these currently affordable neighborhoods, a process we already see happening south and east of downtown Raleigh.

A common feature of naturally occurring affordable housing (NOAH) is age. Generally speaking, housing constructed today will be less expensive, over time, than housing constructed in the future. This process, known as filtering

(<https://www.huduser.gov/portal/pdredge/pdr-edge-featd-article-061520.html>)

, is why some older cities such as St. Louis and Baltimore still have a relatively large supply of housing that's affordable to middle- and lower-income residents. In other words, today's "luxury housing" (i.e. market rate) is tomorrow's NOAH.

Zoning reform is not a "silver bullet" to the housing affordability challenge, but increasing the number and types of homes available is a prerequisite to long-term price stability. Public subsidies, tenant protections, and other innovative programs, like community land trusts, also play a critical role. The City of Raleigh's Housing and Neighborhoods Department administers a [suite of projects and programs](https://raleighnc.gov/affordable-housing) (<https://raleighnc.gov/affordable-housing>) designed to address this side of the equation

How Do Text Changes Affect Housing Choices



Text Changes

(</planning/services/text-changes>)

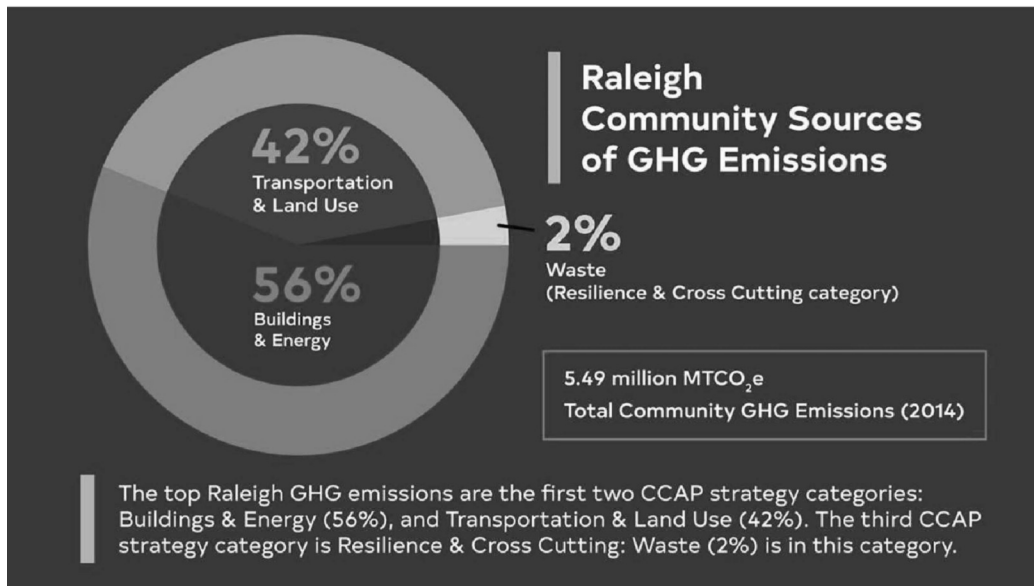
(TC) are amendments to Raleigh's Unified Development Ordinance (UDO). The UDO contains all the development and zoning rules for the city. Collectively, TC-5-20 and TC-20-21 allow more housing types and in more places in our community by allowing the following:

- Shifted from measuring density in "units per acre" to standards for lot size, yards, and building height. This is known as form-based zoning.
- Permitted two-family homes (subdivided or under a common form of ownership) in all districts except R-1 under the same standards as single-family homes.
- Permitted 3+ unit townhouses in R-6, as well as in R-2 and R-4 (when part of a development that includes significant open space.)



- Apartment buildings can be developed on smaller lots when only including three units.
- Reduced the lot size requirements and increased the allowed building size for Tiny Houses. A Tiny House could have a maximum 800-square-foot building footprint and a 1,200-square-foot floor area.
- Permitted Tiny Houses to be used for either single-unit or two-unit (duplex) living.
- Permitted flag lots in residential districts for the construction of Tiny Houses.
- Synchronized lot dimensional standards across most residential building types.
- Allowed denser residential development, including townhouses and apartments, within proximity of planned high-frequency transit with some additional bonuses for affordable units.
- Allowed Accessory Dwelling Units (ADUs) on townhouse lots and two ADUs on a lot when proximate to planned high-frequency transit.
- Reorganized the code to include ADU regulations and Cottage Court regulations in both the Residential and Mixed-Use chapters of the UDO.

Sustainability



Raleigh's Community Climate Action Plan

<https://raleighnc.gov/climate-action-and-sustainability/community-climate-action-plan>

(CCAP) aims to reduce City-wide greenhouse gas (GHG) emissions 80% by 2050. Currently, 42% of Raleigh's greenhouse gas emissions come from transportation and land use. Missing middle housing types are an important means of reaching the city's goal of reducing carbon emissions and other air pollutants. This occurs in three ways:

1. Because multi-family units share walls and/or ceilings with other units, they are substantially more energy-efficient than detached houses. According to the Department of Energy, a unit in a two-to-four-unit apartment uses half the energy of a detached house. A townhouse uses about two-thirds of that amount.
2. When these homes are allowed in places that are close to jobs and shopping, they produce shorter car trips and more walking and transit trips than the average home in the region. This means carbon output from transportation, a major source of emissions, is substantially reduced.



3. Denser development requires fewer roads, pipes, and other infrastructure to service a larger number of people, lowering the overall tax burden on residents.

MORE ABOUT THE MISSING MIDDLE

 [What is the Missing Middle?](https://raleighnc.gov/planning/what-missing-middle)
(<https://raleighnc.gov/planning/what-missing-middle>)

 [FAQ: Raleigh's Missing Middle](https://raleighnc.gov/planning/faq-raleighs-missing-middle)
(<https://raleighnc.gov/planning/faq-raleighs-missing-middle>)

CONTACT

Keegan McDonald
Planning Supervisor
keegan.mcdonald@raleighnc.gov
(<mailto:keegan.mcdonald@raleighnc.gov>)

[919-996-4630](tel:919-996-4630)
(<tel:919-996-4630>)

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