ZONING **PRACTICE** FEBRUARY **2022**

AMERICAN PLANNING ASSOCIATION

ISSUE NUMBER 2

PRACTICE ADAPTIVE REUSE

Zoning to Promote Office-to-Housing Conversions

By Elizabeth Garvin, AICP, and Mary Madden, AICP

At some point during the 2020 COVID-19 lockdowns, the news media started running two sets of planning-related, future prediction stories. The first set of stories fell into the category of "everybody is leaving our cities, and they will never be the same." And the second set were focused on "when everybody works at home full time, we won't need office space, so that space will convert to residential use on a large scale." Apart from the fact that these ideas are somewhat mutually exclusive, both predictions, over time, have also proven mostly incorrect.

The notion that our cities are dying, for one reason or another, has a long history in American culture (such as when the telephone was invented), and we can expect to hear it again for any number of reasons, including during any election cycle, during a recession, or during the next pandemic. The idea that we should convert nonresidential space into residential use—one type of adaptive reuse, which is the practice of converting existing buildings from one use to another—has also had some high-profile moments. Think of the loft conversions that were done in cities large and small across the 1980s and 1990s. This story may have better "legs" in our current circumstances than betting on the death of our cities.

The purpose of this article is to help planners assess opportunities to use zoning to promote office-to-housing conversions in the communities they serve. It begins with brief summaries of the potential benefits of and widespread roadblocks to this type of conversion. Then, it explores how different zoning standards and techniques affect opportunities to adaptively reuse office spaces for residences. The analysis is focused on adaptive reuse in or near urban centers, rather than a suburban setting. However, suburban retrofitting, as explored in other books and articles, may offer an affordable approach to adaptive reuse for communities without urban adaptive reuse opportunities (Dunham-Jones and Williamson 2011; Tachieva 2010; and Strungys and Jennette 2014).

THE BENEFITS OF COMMERCIAL CONVERSIONS

There are several reasons that cities and towns may be interested in supporting adaptive reuse, in general, and the conversion of commercial space to residential, in particular. Places change over time, and viable structures can be left behind. Despite the post-COVID-19 market rebound, experts still anticipate that the demand for office space will change (Szumilo and Wiegelmann 2021).

Adaptive reuse has some significant considerations weighing in its favor. It is one of the greenest forms of development and construction. Reusing buildings reduces the amount of construction debris going into landfills, as commonly occurs following demolition. In addition, it preempts the need to produce and use new building materials. In comparison, it can take decades for a new building to offset the climate impacts caused by construction. Adaptive reuse can also help retain community character and preserve both historic and meaningful structures in a community.

When the reuse helps stabilize or revitalize a neighborhood, it often contributes to more equitable development within the local fabric. The National Trust for Historic Preservation's ReUrbanism initiative promotes adaptive reuse and finds a "clear link between older, smaller buildings and mixed-vintage blocks and higher rates of women- and minority-ownership of businesses" (Preservation Green Lab 2014). As an added benefit in our current age of contentious public hearings, many commercial buildings are in areas where the community expects to find lots of people (and maybe their cars), which can help reduce the NIMBY-ism that can accompany public discussions about increased density in existing, predominately residential neighborhoods.

Adaptive reuse also reinforces many good planning basics. In terms of economic development, adaptive reuse can bring new life to vacant buildings and revitalize a designated area such as a downtown or aging commercial corridor. It can help rectify the housing-jobs imbalance by adding residences to an area that currently rolls up the sidewalks at close of business. And it has the potential to increase the supply of housing—whether market-rate or affordable—to help address a local housing shortage.

ROADBLOCKS TO COMMERCIAL CONVERSION

Before anybody settles in with a copy of the zoning code and red pen, there are some critical barriers to commercial conversion that zoning cannot solve. Even in the current real estate market, suitable properties for adaptive reuse are still a lot more of a unicorn project than an everyday occurrence. There are three key obstacles to more widespread conversion: (1) structure and conversion costs; (2) building code requirements, structure design, and location; and (3) experience.

Structure and Conversion Costs

Despite the potential positive outcomes, the cost of financing a commercial acquisition and conversion is usually the first and commonly the most significant obstacle to adaptive reuse projects.

In high-demand markets, office space rent can be twice as much, on a per-square-foot basis, as residential rent. Many commercial tenants are committed to long-term leases, meaning that the building owners have a guaranteed income stream,

despite the vacant office space. As COVID-19 lockdowns lift and workers return to offices, the temporary dip in demand and increased vacancies will be in our collective rearview mirror, and any financial pressure that building owners may have experienced during COVID-19 will likely dissipate.

Investors, real estate agents, and architects who work in adaptive reuse believe that a longer trend, maybe a decade or more, of high vacancy rates would be needed to push more conversions. Real estate service firm Cushman & Wakefield is predicting that the commercial real estate market will stabilize to pre-COVID-19 vacancy levels by 2025 and that office demand will continue to grow over the next 10 years (Thorpe and Rockey 2020). This means that property owners will probably not be tempted to sell, and developers will probably not be tempted to buy, commercial real estate for residential conversion in the near term.

Real estate experts also say that despite COVID-19, the vacancy rate is still fairly low, on average, and building owners that are trying to sell have not lowered prices anywhere near low enough to be purchased for conversion (Grabar 2021). Because of the investment required to own and the income stream created through commercial property ownership, there can be very little incentive to either sell or convert a property until it is significantly devalued.

Once a structure is purchased, the developer still must factor in the cost of conversion. The list of interior and exterior changes may include moving walls to reconfigure residential spaces, adding windows, modifying spaces or features to comply with accessibility requirements, adding elevators, creating multiple means of egress, and installing or expanding fire sprinklers. Also, building utilities, such as plumbing and electrical lines, may need to be rerouted from centralized locations and expanded to serve multiple residential spaces with the addition of multiple new meters.

These costs can create a disconnect for a developer or community looking to create anything less expensive than market-rate housing. Multiple case studies of successful adaptive reuse projects note that the project required tax breaks and still resulted in the creation of luxury units. Whether this was to meet perceived market demand or cover project costs, or both, planners should understand what the project pro forma will require to "pencil out" before concluding that an adaptive reuse project will help create any housing that is more affordable than what would otherwise be constructed. Local planning or economic development staff knowledge of how potentially applicable state and federal tax incentives, such as tax increment financing or low-income housing tax credits/historic tax credits, might apply to a project could help a developer's understanding of those programs and increase the probability of a conversion being completed.

Building Code Requirements, Structure Design, and Location

Residential structures typically require more windows, and natural light in general, than can be provided in the conversion of modern, large-scale commercial floorplates. The preferred conversion floorplate is that of a pre-WWII building, which were typically shallower and had larger windows. Many pre-war commercial and industrial buildings in larger cities have been converted over the past 30 years, creating lofts and apartments, and those waves of conversion included many of the easy-to-convert buildings (Grabar 2021).

Post-war, urban lot consolidation was used to enable the construction of much larger commercial buildings with expanded floorplates (Farivar 2021). Converting a large floorplate commercial building—office or retail—to residential use creates a doughnut of residential uses around the exterior and a hole of unusable space in the center. When the building was a commercial use, this space may have been used for retail, conference rooms, storage (pre-cloud, back in the days of paper files), internal offices or open-plan seating, or for functional spaces such as elevators and restrooms. This works in a commercial setting, but it is of limited use in a residential setting, where residential building codes require windows that provide access to natural light and air in habitable rooms.

This problem is not insurmountable, though. According to David Waxman, managing partner at MM Partners in Philadelphia, the conversion of each building needs to be approached individually, where "the building tells you how to lay it out." Future tenants of these new homes are looking for unique spaces, not cookie cutter apartments. One thing that communities can do to help this process along, says Waxman, is to establish a streamlined process to help developers address previous code violations on vacant and abandoned buildings.

Even when the building floorplan can be redesigned or reconfigured in an effective manner, there may be aspects of the site or location that are either expensive to fix or that cannot be fixed. These can include environmental contamination, insufficient infrastructure capacity, or inadequate access to public transportation or shared mobility services (Morley 2019).

Experience

It can take a significant amount of time and effort to work through the highly uncertain approval process common to adaptive reuse projects, particularly in communities where such conversions rarely occur. There will be some developers with previous experience who can navigate the approval process, some developers who appreciate the challenge, and many who understand their current pro forma and development model and have no incentive to try something new. In communities with undeveloped or underutilized land, most developers will find it preferable to build a new apartment complex rather than convert a building designed and constructed for a different purpose.

ASSESSING THE NEED FOR ZONING CHANGES

The impact of zoning on adaptive reuse projects can range from "very helpful" to "project-ending." There are multiple potentially useful zoning tools available that can be used separately or jointly to accommodate, expedite, or incentivize commercial conversion projects. And there can be current regulations that create absolute barriers to adaptive reuse.

Before initiating any zoning changes, planning staff should engage in some big-picture problem solving by: (1) articulating a clear understanding of intent and purpose that identifies what issue(s) the community is trying to address through conversion and in what contexts; (2) assessing which zoning tools are currently available and what new tools might be needed; (3) reviewing the current regulations for common barriers, found in the use table, lot design standards, parking regulations, and review processes; and (4) describing the basic zoning approaches (preferably paired with helpful financial incentives) that the community wants to enable.

It helps to make this assessment three dimensional by considering the geographic places—not just the zoning districts—within the community where conversion projects make sense and then looking at the infrastructure and services (are they compact and walkable? supported by transit? auto-dependent?) needed to make the project successful. At a minimum, the following code requirements should be reviewed and potentially updated, either for a specific location or community-wide, in any community wishing to better accommodate or expedite commercial conversion projects.

Permitted Uses and Use Locations

The applicable zoning must allow residential uses, preferably as a permitted or by-right use. Asking an applicant to first get approval for the core use of the project, through a discretionary review process, such as conditional use review or planned development, adds uncertainty to the project, which always translates to added time and expense for both the applicant and planning staff. Geographic areas of the community that might benefit from commercial conversion should be zoned to allow at least mixed-use development, whether the zoning code is form-based or conventional.

The community should also look at tailoring any applicable ground-floor commercial use requirements. Ground-floor retail design requirements, such as large shopfront windows and generous minimum ceiling heights, are excellent planning tools for creating mixed-use neighborhoods, but they have frequently been applied more widely than needed and can directly conflict with residential conversion.

Anecdotally, planners have been discussing the length of time that required ground-floor commercial space sits vacant, while property owners raise concerns about the impact of those vacancies on rental rates and the impact of the ground-floor commercial space on their ability to obtain financing (Butcha and DePass 2020). The Congress for New Urbanism suggests less restriction on the mix of uses along the ground floor outside of a limited "main street" environment, which is typically no longer than one-quarter mile in length, not throughout the district (Forest et al. 2018).

Cedar Falls, Iowa, recently updated its **downtown zoning code and map** to limit the requirement for active ground-floor commercial uses (and the related storefront design) to the four blocks of Main Street that comprise the primary downtown retail district (Ordinance Nos. 2994 & 2995).

This allows older structures on streets outside of the downtown core to be converted to a mix of, or fully residential, uses. It also allows building owners to better respond to market demand rather than have vacant shopfronts, as most cities cannot support the amount of retail needed to fill every ground floor in their downtowns.

Lot Size and Dimensional Standards

Ideally, commercial-to-residential conversion will not require any changes to existing lot size or setback requirements. The zoning regulations should allow the structure to be converted as-is on the current lot and within the existing setbacks. Many contemporary zoning codes still require larger setbacks for residential development, or a minimum amount of lot area per dwelling unit, under the assumption that residential uses should be physically separated from nonresidential uses. While giving some residential property owners highly valued personal spaces, these requirements also result in higher infrastructure and public service costs, sprawling development patterns, and residents who believe (thanks in part to planners) that bringing different uses together is somehow bad for the community.

If the current zoning regulations require a minimum amount of lot area per unit or different setbacks for residential uses in commercial or mixed-use districts, these regulations should be revised to allow commercial (or residential) conversion within the existing building envelope. This is particularly true for those locations with small lots and a fine-grained, interconnected street and block structure, such as a downtown environment. Any standards that would require lot consolidation or the removal of structures on adjacent parcels to move forward with an adaptive reuse project should be revised.

Site Changes to Accommodate Parking, Landscaping, or Lighting

Many modern zoning codes are more focused on new or greenfield development than redevelopment or infill, resulting in regulatory gaps that create problems for both applicants and planners. They provide little or no guidance about how to apply parking, landscaping, or open space requirements when changes to an existing structure trigger the applicability of site-related development standards. Or they fail to distinguish between "change in use" requirements in different community contexts—from a historic downtown to more recent development on the edge of town—particularly when there is no expansion of the structure. It is very common to find a zoning code that

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Main Street in downtown Cedar Falls, Iowa.

requires full compliance with "all applicable development standards" when a structure is changed by 50 percent.

Applying development standards oriented to new development to a retail-to-retail conversion (such as changing a pad-site building from a retail shop to a restaurant) is probably more feasible than applying those same standards to a commercial-to-residential conversion, particularly in an urban location. Two categories of zoning code updates can be particularly helpful here: (1) changes to how the applicability threshold is structured and (2) the creation of a process that allows even greater flexibility in application for adaptive reuse.

The starting place for these code changes is moving away from a one-size-fits-all 50 percent change threshold and better specifying where different changes are triggered based on three considerations: (1) the existing area context (and potentially applicable zoning if that is helpful), such as downtown or commercial corridor; (2) the type of development standard and whether it applies to the structure (e.g., façade requirements), use, or site (e.g., parking requirements); and (3) the location of the structure on the site. The applicability of some development standards, such as the amount of parking required, may be triggered by a change in use, while the location of parking (or relocating the parking), would only be required where there were changes to the building's footprint, and even then, the amount of compliance might still be limited.

For example, a community can permit some or all of an increase in required parking to be provided off-site, if the project is located in a walkable, mixed-use area, or reduce the required parking if near transit. A community can address the location of required parking by requiring any new parking to be located behind an existing structure, where there is space available.

The applicability of other development standards might also include a sliding scale of thresholds. Structure or use changes that require full compliance with landscaping standards in a suburban setting may be modified to a street tree or hardscape (e.g., bench, art, or fountain) requirement in an urban or downtown setting. And some categories of development standards, such as architectural or design requirements, should be linked to proposed changes to the part of the building that requires the design, such as a façade, and not an expansion on the rear of the structure.

All of these proposed approaches are intended to limit an outcome where the application of nonessential development standards effectively stops a project. To the maximum extent possible, the zoning standards should be clear when the development standards are triggered in different contexts, recognizing both the site and cost implications of requiring significant changes to existing structures and site layout.

Changes to the applicability thresholds should be paired with the creation of a ministerial (administrative) adjustment process that allows minor modifications to the applicable development standards to make further changes that might be needed to make the development standards site specific. This process can be used to make minor measurement adjustments to account for existing site conditions, such as allowing new parking to encroach into a setback by two feet to avoid paving over an existing infrastructure easement or allowing a street tree to be moved by two feet to accommodate a transit stop.

Creating certainty around how these standards will be applied is important to both the project design and the applicant's ability to obtain financing. "The universe of lenders (for these projects) is small, and they want some certainty," says Waxman.

Nonconformities

Restricting the redevelopment of nonconforming structures, uses, lots, and site features (e.g., the location of parking or access) is often a companion problem to poorly set applicability thresholds. And because most of the structures considered for adaptive reuse are older and have outlasted more than one iteration of the zoning regulations, these projects frequently contend with multiple nonconformities. This problem can effectively freeze the structure and site in place while the property owner seeks relief, unnecessarily adding to the cost and uncertainty of redevelopment.

Communities that recognize this problem may respond with the generous issuance of variances, but that is not a best practice because it still requires the applicant to jump through extra hoops for discretionary approvals to address a problem caused by the zoning code, not the project. Rather, communities should update the nonconformity regulations to recognize that these structures are an integral part of the neighborhood and that redevelopment is a better approach than demolition (Goebel 2020).

Open Space Dedication

A fourth zoning code revision to encourage commercial conversion is building flexibility into open space dedication requirements. As we've seen through our collective COVID-19 experience, the location and availability of park space is both a quality-of-life requirement and an equity concern. Commercial conversions, given their original design as commercial spaces, may be in areas where parks and open spaces were small or nonexistent. Unlike setback standards, or some would argue minimum parking requirements, open space standards should not be shrunk or eliminated for adaptive reuse, but should be reconceived (Bogle, Diby, and Burnstein 2016).

One approach to adding neighborhood open space in an urban setting is to move from traditional on-site open space dedication to payment of in-lieu fees for the creation of off-site parks. Urban parks, in particular, play multiple roles in the community, including creating a sense of place, providing both a cultural amenity and room for other cultural amenities (e.g., art fairs, concerts, and festivals), allowing passive and active recreation, preserving history and heritage, providing environmental and public health benefits by reducing the urban heat island and assisting with stormwater management, and spurring economic development (Ellis and Schwartz 2016). A large-scale example of identifying urban park options is Montgomery County, Maryland's design standards for eight types of urban parks (2019). Alternatively, open space can be incorporated across an adaptive reuse site and structure, as permitted by Santa Ana, California, where community rooms, private balconies, and public courtyards are all considered viable forms of open space (**§41-1650 et seq.**).

When the pieces come together, adaptive reuse can provide multiple benefits to a community. Philadelphia, for example, has seen the creation of 1,800 apartments in 10 buildings over the past few years (Bond 2021). As one of our oldest cities, Philadelphia has a significant supply of older buildings, so this may not seem surprising, but both the city

and development community have focused on encouraging these conversions. Past updates to the zoning code have allowed the conversion of factories and other industrial structures, recent changes to property tax abatements have created a financial incentive for rehabilitation, and new legislative changes have created flexibility in the application of parking and zoning standards for the redevelopment of qualified historic structures.

Local developers MMPartners have had multiple successful adaptive reuse projects, including the Poth Brewery in North Philadelphia's Brewerytown neighborhood. Started in 2018, this adaptive reuse will result in the conversion of a 148-year-old brick brewery and cold storage building into 135 lofts and 25,000 square feet of commercial space.

NEXT STEPS

Projections for residential construction over the short-term range from slow growth to no growth, despite housing shortages and overheated residential housing markets. Large banks and real estate investors predict that "high borrowing costs and high prices mean that affordability issues will slow demand," and construction will decline (Knightley and van Sante 2021). Additional problems noted by the American Institute of Architects (AIA) in their July Consensus Construction Forecast include unreliable global supply chain and labor shortages (Walsh 2021). The large unknown in this scenario is the impact of the newly adopted Infrastructure and Investment Jobs Act.

While these issues shake themselves out, and returning to the opening consideration of the value of predictions in uncertain times, now is a good time for planners to move forward to smooth the path for upcoming adaptive reuse projects. This should be a three-step process:

1. Update the zoning code.
2. Explore building code options.
3. Share the process and educate the development community.

This article recommends several specific amendments that should help make a functional zoning code better able to accommodate adaptive reuse. Communities can go one step further by putting an adaptive reuse ordinance in place. Models and guides include Preservation Green Lab's model ordinance (2017), the Federal Emergency Management Agency's guide on adaptive design (FEMA 2021), and Chester County, Pennsylvania's tool on adaptive reuse (N.d.).

There are also model building codes for existing buildings. For example, the International Code Council's International Existing Building Code (IEBC), focuses on encouraging the use and reuse of existing buildings. States with their own series of building codes may also have something similar, such as the California Historical Building Code.

The zoning code may be updated and the existing building code adopted, yet the local development community may still be overlooking adaptive reuse opportunities. This is a good time to engage in community outreach, including the development community, property owners, and neighborhoods. Adaptive reuse is more of a team sport than an individual pursuit, and it helps to have the team in place and ready for these projects. Good outreach can include brown-bag lunches and how-to videos. Better outreach can include both process and project education that dig into issues relevant to developers, such as market demand, pro formas, and potential financial incentives.

Communities may still be dealing with COVID-19 throughout 2022 (and 2023); the supply chain may still have more demand than supply; and the naysaying predictions may still seem true. Also true is that in many cities, towns, and counties there are, and will still be, older buildings that can be put to new and more vibrant uses in ways that contribute more housing and improved equity. This is a good time to rework the zoning code to remove barriers and potentially create a specific set of regulations that allow those structures to be put back to work in a way that benefits our neighborhoods, our environment, and our collective future.

Max Grudzinski

The Poth Brewery adaptive reuse project in Philadelphia.

ABOUT THE AUTHORS

Elizabeth Garvin, AICP, is an attorney and planner who focuses on writing (and rewriting) land development regulations. She is a consulting planner with Clarion Associates in Denver, and founded Community ReCode to focus on the unique needs of small cities and rural communities.

Mary Madden, AICP, is a planner and urban designer who is interested in maintaining and creating compact, walkable places. Based in Fayetteville, Arkansas, her work at Madden Planning emphasizes revising zoning codes to promote smart growth, revitalization, and sustainability.

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VOL. 39, NO. 2

The American Planning Association will lead the way to equitable, thriving communities by creating unique insights, as well as innovative and practical approaches that enable the planning community to anticipate and successfully adapt to the needs of a rapidly changing world.

Zoning Practice (ISSN 1548–0135) is a monthly publication of the American Planning Association. Joel Albizo, FASAE, CAE, Chief Executive Officer; Petra Hurtado, PHD, Research Director; David Morley, AICP, Editor.

Subscriptions are available for $95 (U.S.) and $120 (foreign). Missing and damaged print issues: Contact APA Customer Service (312-431-9100 or subscriptions@planning.org) within 90 days of the publication date.

Printed on recycled paper, including 50-70% recycled fiber and 10% postconsumer waste.

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205 N. Michigan Ave.
Suite 1200
Chicago, IL 60601–5927

IS YOUR ZONING CODE HELPING OR HINDERING OFFICE-TO-HOUSING CONVERSIONS?

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