Group Living Code Amendment

Public Open Houses: February-March 2020
What are we proposing to change?

• This project will update zoning regulations for all residential uses, including conventional houses and apartments, group homes, assisted living facilities, shelters and halfway houses.

• Changes will include updates to:
  o Definitions and requirements (off-street parking requirements, etc.)
  o Use limitations (size, required spacing between facilities, etc.)
  o Permitted zone districts (places where such uses are permitted)

• This project will **not** change regulations separate from the Zoning Code governing noise and maintenance of properties, operation of facilities like halfway houses, licensing or building and fire safety.
Current state

- Options for Denver’s most vulnerable neighbors concentrated in certain neighborhoods or industrial areas that lack transportation, jobs and amenities of a complete community.
- Outdated regulations and definitions limit creative, affordable housing solutions and opportunities.
- Inconsistent notification and permitting processes cause neighborhood conflict.
How this impacts Denverites

• Common solutions to saving money on rent/mortgage aren’t allowed: people living with multiple roommates; two families living together.

• Zoning categories create barriers and inequity for people looking for housing options and necessary services.

• People who need care can’t get it in their neighborhoods.

• Permitting process is cumbersome, confusing and inflexible for providers and frustrating for neighbors.
Denver’s Adopted Goals

- **Blueprint Denver:**
  - Modernize code to ensure inclusive housing for all
  - Enable and support housing options for people experiencing homelessness

- **Denver Comprehensive Plan:**
  - Increase housing options for Denver’s most vulnerable
  - Support equitable, affordable and inclusive housing
Desired Future State

- Attainable, affordable and flexible housing options allowed in all parts of the city.
- No populations excluded from any neighborhood.
- Diverse, safe and complete neighborhoods, where residents of all types have access to housing, transportation, jobs and everyday needs like high quality food.
- Homes where care is provided are indistinguishable from other housing in neighborhoods.
- Denver offers residents a spectrum of housing types to meet their needs.
Role of the Zoning Code

Decisions about locating residential uses, including care and group homes, are influenced by:

Funding

Availability and cost of land

Building and Fire Codes

Zoning
- Location
  - Permitted Districts
  - Spacing, Density, Buffering
- Size of facility
<table>
<thead>
<tr>
<th>Household Living</th>
<th>Group Living</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Single Unit</td>
<td>• Residential Care, Small</td>
</tr>
<tr>
<td>• Multi-Unit</td>
<td>◦ Transitional Housing</td>
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<td>◦ Special Care</td>
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<td>◦ Assisted Living</td>
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<td>• Residential Care, Large</td>
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<td>◦ Shelter for the Homeless</td>
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<td>◦ Community Corrections</td>
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<td>• Rooming and Boarding</td>
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<td>• Nursing/Hospice care</td>
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<td>• Housing for Older Adults</td>
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<td>• Student Housing</td>
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<td>• Transitional Housing</td>
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<td>• Special Care</td>
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<td>• Assisted Living</td>
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<tr>
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<td>• Shelter for the Homeless</td>
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<td></td>
<td>• Community Corrections</td>
</tr>
</tbody>
</table>
Uses not clearly addressed in the code’s residential regulations

- Group homes for people protected by the Federal Fair Housing Act/State Group Home Statute (sober living, etc.)
- Cooperative, multigenerational housing, co-living
- Single-Room Occupancy (regulated as a lodging use) and Tiny Home Villages
- Common living arrangements like people living with roommates, multiple families sharing a home, etc.
Many uses that function like households can't meet the zoning code's strict definitional limits, which date back to the 1950s:

- Single-Unit use (typical detached house): **2 partners or unrelated adults**, unlimited family members of any age from specific list:
  - grandparent, child, sibling, step-child, step-sibling, step-parent, grandchild, parent-in-law, sibling-in-law, child-in-law, parent-sibling (uncle or aunt), or nibling (nephew or niece)

- Two- or multi-unit use (duplex, apartment, etc.): **4 unrelated adults**, unlimited family members of any age (from same list).
## Details: Current residential uses ranked by permissiveness of zoning

<table>
<thead>
<tr>
<th>Residential Use</th>
<th>Permitted Zone Districts</th>
<th>Other Use Limitations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Household Living</td>
<td>Allowed in nearly all zone districts</td>
<td>none</td>
</tr>
<tr>
<td>Housing for 55+</td>
<td>Allowed in nearly all zone districts</td>
<td>none</td>
</tr>
<tr>
<td>Assisted Living</td>
<td>Allowed in nearly all zone districts</td>
<td>Spacing/Density in low-intensity zone districts</td>
</tr>
<tr>
<td>Transitional Housing</td>
<td>Allowed in nearly all zone districts</td>
<td>None (“institutionalization” language, no specific requirements)</td>
</tr>
<tr>
<td>Special Care Home, Small</td>
<td>Allowed in nearly all zone districts</td>
<td>None (“institutionalization” language, no specific requirements)</td>
</tr>
<tr>
<td>Nursing Home/Hospice</td>
<td>Allowed in limited zone districts (not low-intensity residential)</td>
<td>none</td>
</tr>
<tr>
<td>Student Housing</td>
<td>Allowed in limited zone districts (not low-intensity residential)</td>
<td>none</td>
</tr>
<tr>
<td>Rooming and Boarding House</td>
<td>Allowed in limited zone districts (not low-intensity residential)</td>
<td>none</td>
</tr>
<tr>
<td>Special Care Home, Large</td>
<td>Allowed in nearly all zone districts</td>
<td>Spacing/Density</td>
</tr>
<tr>
<td>Shelter for the Homeless</td>
<td>Allowed in nearly all zone districts</td>
<td>Spacing/Density/Buffering/Bed Limits by City Council District</td>
</tr>
<tr>
<td>Community Corrections</td>
<td>Allowed in very few zone districts</td>
<td>Spacing/Density/Buffering</td>
</tr>
</tbody>
</table>

### Small Residential Care Uses

- Household Living
- Housing for 55+
- Assisted Living
- Transitional Housing
- Special Care Home, Small
- Nursing Home/Hospice
- Student Housing
- Rooming and Boarding House

### Large Residential Care Uses

- Shelter for the Homeless
- Community Corrections
New facilities could be established in tan areas.

Where 4,000' buffers overlap tan areas, presence of other Large Residential Care Facilities would preclude additional CCFs.
Problems with the Code

- Outdated definition of “household” limits common living arrangements and reduces affordability especially for people who could live with roommates.

- Residential Care regulations treat some populations inequitably, such as people who are experiencing homelessness or in community corrections.

- It is difficult to establish some needed uses, like Community Corrections facilities.

- Some existing facilities cannot grow to meet demand.

- Some evolving uses are not clearly regulated, such as sober living, co-ops, and tiny homes.

- Inconsistent notification and permit requirements can interfere with establishing some kinds of shelters and frustrate neighbors who cannot stop the permitting process.
How staff analyzed these issues: GLAC

- **Group Living Advisory Committee:**
  - Cross-section of housing providers, residents & guests, designers, neighborhood representatives, advocates and community leaders
  - 27 topic-specific “subgroup” meetings in 2018 & 2019 (focused on residential care, community corrections, shelters, etc.)
  - 5 full GLAC meetings
  - 5 site visits (Denver Rescue Mission, Queen City Coop, Step Denver, etc.)
  - All events published on project website and open to the public.

- **GLAC Role:**
  - Relate personal/occupational experience with code
  - Review peer research and data
  - Consider and recommend alternatives proposed by staff
    - Decision-making criteria
How staff analyzed these issues: Public Engagement

- All **GLAC meetings** open to public and attended by many stakeholders
- **Public events:**
  - Problem statement open house October 2018
  - Open Houses and “office hours” events in early 2020
- **Other Outreach**
  - Staff focus groups with various providers and residents
  - Multiple presentations at Inter-Neighborhood Cooperation (INC) and individual RNO/community meetings (15 as of February 2020).
  - Staff presentations to advocacy organizations (Anti-Displacement Network Denver, Homelessness Leadership Committee, Denver Commission on Cultural Affairs, etc.)
How staff analyzed these issues:
Peer City and Best Practices research

**Peer City Shelter Regulations**

<table>
<thead>
<tr>
<th>City</th>
<th>Name of Use</th>
</tr>
</thead>
<tbody>
<tr>
<td>Denver</td>
<td>Shelter for the Homeless</td>
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<tr>
<td>Los Angeles</td>
<td>Shelter for the Homeless</td>
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<tr>
<td>Minneapolis</td>
<td>Emergency Shelter/Overnight Shelter</td>
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<tr>
<td>Oakland</td>
<td>Emergency Shelter/Transitional Housing/Supportive Housing</td>
</tr>
<tr>
<td>Seattle</td>
<td>Community Center</td>
</tr>
<tr>
<td>Austin</td>
<td>Emergency or Temporary Shelters for Homeless Persons</td>
</tr>
<tr>
<td>Salt Lake City</td>
<td>Homeless Shelter</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>City</th>
<th>Beds allowed/Occupancy max.</th>
<th>Distance from other facilities</th>
<th>Other Spacing/Density Requirement</th>
<th>Parking requirement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Denver</td>
<td>5-100 (depending on)</td>
<td>0-2,000 feet</td>
<td>NA</td>
<td>Commercial use.</td>
</tr>
<tr>
<td>Salt Lake City</td>
<td>1,000 feet; no more than 2</td>
<td>1,500 feet</td>
<td>NA</td>
<td>NA</td>
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<tr>
<td>Austin</td>
<td>1,300 feet</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
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<tr>
<td>Denver</td>
<td>1,300 feet</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
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<tr>
<td>Salt Lake City</td>
<td>1,600 feet</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
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<tr>
<td>Austin</td>
<td>1,300 feet</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
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<tr>
<td>Portland</td>
<td>1,000 feet</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
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</table>

**Peer City CCF Zoning Requirements**

- Spacing between facilities: 1.500 feet
- Spacing from schools: 3,000 feet

**Peer Cities Review: Unrelated Adults Allowed in Single Unit**

<table>
<thead>
<tr>
<th>City</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>5</th>
<th>6</th>
<th>7</th>
<th>8</th>
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<tbody>
<tr>
<td>Denver</td>
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<td>Boulder</td>
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<td>Aurora</td>
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<td>Arvada</td>
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<tr>
<td>Austin, TX</td>
<td></td>
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<tr>
<td>Seattle, WA</td>
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<tr>
<td>Most California Cities</td>
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</tr>
</tbody>
</table>

**Notes:**
*More under certain circumstances.*

Cities surveyed permit unrelated family members nearly all regulated by Dwelling Unit.
How staff analyzed these issues:
Review of enforcement and permit data

- 20% of homes and 30% of Residential Care Facilities had zoning violations between 2016 and 2018.

- Maintenance and trash overflow most common for both

- Conventional Homes had three times as many instances of multiple violations
<table>
<thead>
<tr>
<th>Problems Identified</th>
<th>Proposed Solutions</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Outdated definition of “household” limits common living arrangements and reduces affordability especially for people who could live with roommates.</td>
<td>• Allow more unrelated people the choice to live together, subject to existing building, fire, and housing code requirements to protect health and safety. <em>The code currently allows an unlimited number of related people of any age to live together.</em></td>
</tr>
<tr>
<td>2. Residential Care regulations treat some populations inequitably, such as people who are experiencing homelessness or in community corrections.</td>
<td>• Regulate residential care by the size of the facility, not by the housing status or type of care guests are receiving, as the code currently does. Smaller facilities would have fewer restrictions than larger facilities.</td>
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</table>
## What this means: Household Definition

<table>
<thead>
<tr>
<th>Current</th>
<th>Proposed</th>
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<tbody>
<tr>
<td>• Two unrelated or partnered adults plus unlimited family members of any age from list</td>
<td>• Specific number of adults and unlimited minor relatives</td>
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<tr>
<td></td>
<td>• Adults living together as roommates</td>
</tr>
<tr>
<td></td>
<td>• Two or more families living together</td>
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<td></td>
<td>• Cooperative, multigenerational housing</td>
</tr>
</tbody>
</table>
What this means: regulating by size of facility

<table>
<thead>
<tr>
<th>Residential Use</th>
<th>Permitted Zone Districts</th>
<th>Other Use Limitations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Household Living</td>
<td>Allowed in nearly all zone districts</td>
<td>none</td>
</tr>
<tr>
<td>Very Small Residential Care</td>
<td>Allowed in nearly all zone districts</td>
<td>Additional zoning requirements (e.g. off-street parking)</td>
</tr>
<tr>
<td>Small Residential Care</td>
<td>Allowed in nearly all zone districts</td>
<td>Spacing limitations in low-intensity zone districts</td>
</tr>
<tr>
<td>Non-Household Living (Single-Room</td>
<td>Allowed in limited zone districts (not low-intensity</td>
<td>Building form, off-street parking requirements</td>
</tr>
<tr>
<td>Occupancy, Permanent Tiny Home Village,</td>
<td>residential)</td>
<td></td>
</tr>
<tr>
<td>Rooming and Boarding, etc.)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Medium Residential Care</td>
<td>Allowed in limited zone districts (not low-intensity</td>
<td>Spacing limitations vary based on zone district intensity</td>
</tr>
<tr>
<td>Large Residential Care</td>
<td>Allowed in limited zone districts (not low-intensity</td>
<td>Density Limitations, Spacing limitations vary based on zone</td>
</tr>
<tr>
<td></td>
<td>residential)</td>
<td>district intensity</td>
</tr>
</tbody>
</table>
Scenarios

Household of two families (two unrelated sets of parents) and their children in a single-unit (detached) home

Current:
- Would not be permitted per household definition

Proposed:
- Would be permitted per household definition

Household of 5 unrelated adults living as roommates

Current:
- Would not be permitted per household definition

Proposed:
- Would be permitted per household definition
Scenarios

A landlord owns a large house and leases bedrooms individually

Current:
- Permitted as rooming and boarding house use in higher-intensity zone districts

Proposed:
- No change – permitted as rooming and boarding house in higher-intensity zone districts

A provider wants to open a facility housing 25 non-paroled individuals along a commercial corridor, where guests will use transit to access jobs

Current:
- Not permitted – the code only allows facilities serving non-paroled individuals in industrial areas and the Downtown core.

Proposed:
- Permitted as a Small Residential Care facility, subject to use limitations. Any facility serving non-paroled individuals must have a formal relationship with Denver Department of Safety
### Key problems and proposed solutions

<table>
<thead>
<tr>
<th>Problem Identified</th>
<th>Proposed Solution</th>
</tr>
</thead>
</table>
| 3. It is difficult to establish some needed uses, like Community Corrections facilities. | • Allow them in more districts and reduce or remove spacing requirements to allow new facilities where residents can live near transportation, jobs, and amenities.  
• Allow a spectrum of housing options to be provided on the same zone lot to support people moving from emergency shelter to transitional, supportive, and independent housing. |
| 4. Some existing facilities cannot grow to meet demand. | • Remove zoning code caps on size of larger facilities to allow providers to determine the scale of facilities based on best practices and resources. Allow existing facilities to expand in place. Allow facilities to accommodate more people for up to ten days during emergencies. |
What this means: Spectrum of Housing

Current

- Residential Care Uses specifically defined by populations, spacing required between facilities

Proposed

- Residential care zoning permits issued by number of people served only.
- Conventional multi-unit apartments and other residential care uses permitted in addition on-site, where permitted by zone district
What this means: Existing Facilities

Current

• Non-conforming and/or compliant (e.g. "grandfathered") facilities restricted from expansion, reconstruction, transfer to new operator.

Proposed

• Treat legally-established residential care facilities as conforming, with a maximum number of guests as most recently permitted
• Allow reconstruction or expansion of structures
• Allow additional primary uses as permitted by zone district (multi-unit, smaller residential care, etc.)
Scenarios

Large Residential Care Facility (100+ guests) providing emergency shelter and transitional (longer-term) housing.

Current:
- Current code's spacing requirements would prohibit two separate residential uses on one site

Proposed:
- Residential Care permit allows spectrum of housing types

Existing Denver Rescue Mission facility at Lawrence and Broadway redevelops with new structure containing shelter and supportive apartment housing

Current:
- Use is considered "compliant" – legally established but does not meet a current use limitation (spacing from other facilities)
- Zoning Code's limits reconstruction and expansion of existing structures with compliant uses

Proposed:
- Use considered conforming, with most recently authorized number of guests
- Can rebuild, expand structure.
- Additional permitted uses, such as multi-unit, permitted where zoning allows multiple primary uses on a lot (mixed-use, downtown districts)
Scenarios

What happens if Independence House, a Community Corrections Facility on Pecos St. Near 41st street, wants to reconstruct with a larger facility?

Current:
- Use is considered "non-conforming" – legally established but no longer permitted in TU (two-unit) zone district
- Expansion of structure and guest capacity not permitted

Proposed:
- Use considered "conforming" with most recently authorized number of guests.
- Structure can be rebuilt or expanded
- Guest capacity cannot be expanded unless site is rezoned to a district that allows larger Residential Care Facility
- Zoning Administrator may consider expansion of population in certain circumstances

What happens if the Community Corrections facility at Fox and 44th wants to expand the number of guests served from the current 90 to a number that would be permitted by fire safety standards?

Current:
- This would not be permitted – the zoning code specifically limits this site to 90 residents

Proposed:
- This site could apply for a Large Residential Care permit, consistent with requirements for establishing a new use, allowing a number of guests consistent with building safety standards.
<table>
<thead>
<tr>
<th>Problem Identified</th>
<th>Proposed Solution</th>
</tr>
</thead>
</table>
| 5. Some evolving uses are not clearly regulated, such as sober living, co-ops, and tiny homes. | • Consolidate residential care uses into a single category regulated by size and clarify what types of facilities are included.  
• Allow larger groups of people to live together and in clusters of tiny home units in the same districts where multi-unit housing is allowed. |
| 6. Inconsistent notification and permit requirements can interfere with establishing some kinds of shelters and frustrate neighbors who cannot stop the permitting process. | • Require Community Information Meetings prior to submitting a formal application for larger residential care uses to notify and educate neighbors and foster positive relationships. |
What this means: Sober Living

Current

• No clear accommodation in zoning

Proposed

• Permitted as Household Living for up to 8 individuals who are not required to receive care and live as a single housekeeping unit
• Permitted as Residential Care where program of care is a condition of residency
What this means: Tiny Home Villages, Single-Room Occupancy

Current

- THV: No clear accommodation in zoning
- SRO: only permitted as lodging use, not for permanent occupancy

Proposed

- Both permitted wherever multi-unit housing is allowed.
- Tiny Home Village common structures must meet Zoning Code building form and site design requirements impacting the public realm (built-to, transparency, etc.)
What this means: Community Information Meeting

- Staff provides CIM requirements to applicant
- Applicant notifies and holds meeting for neighbors
  - May enter into agreements (Good Neighbor, etc.)
- Applicant provides record of meeting and any applicable commitments or agreements
  - Some commitments may be conditions of zoning permit
Scenarios

Seven people live together as roommates, supporting each other in maintaining sobriety
Current:
  o No clear regulation, typically permitted as household consistent with Federal Fair Housing Act and CO Group Home Statute.
Proposed:
  o Permitted as a household

Five people live together in a home where they are supervised and required to receive treatment
Current:
  o Would be permitted as a Small Residential Care facility
Proposed:
  o Would be permitted as a Very Small Residential Care facility
Scenarios

An operator wants to apply for a zoning permit to run a small Residential Care Facility serving 35 guests in a 3-story mixed-use district. Neighbors want to know more about the project.

Current:
- Applicants are required to post signs on the property and notify City Council members and Registered Neighborhood Organizations of application for zoning permit.
- Zoning Administrator issues permit based on application compliance with zoning criteria.

Proposed:
- Applicants are required to hold a facilitated public meeting, providing mailed notice to property owners within 400 feet of a subject site, city council members, RNOs and other organizations.
- Meeting provides opportunity for neighbors to learn about operators and proposal.
- Operator may enter into agreements with neighbors to address external impacts.
- Zoning Administrator may note some agreements as conditions of permit approval (e.g. hours of operation).
Stakeholder Concerns

Large households: safety and maintenance
• 89% of Denver households contain just one or two adults – this follows national trends and is not expected to change dramatically.
• Building and Fire codes updated recently to acknowledge more unrelated people living together, clarify fire and other safety requirements
• Denver is growing its Zoning Neighborhood Inspection Services team to meet rising demand.

Unscrupulous landlords renting out rooms
• Proposed changes would legitimize common housing arrangements that already exist all over Denver and all cities.
• Household Living would only accommodate a group of people functioning as a single housekeeping unit.
• Maintenance requirements and enforcement would continue as it does currently.

Eight people seems like a high number
• The Colorado Group Home Statute already requires municipalities to treat groups of up to 8 unrelated people with certain disabilities or over the age of 60 as a single household.
• Though current regulations are not well known by residents, Census data shows there are currently approximately 72 homes with 8 or more people in Denver. We do not expect a major change in the way people choose to live together.

More FAQs at www.denvergov.org/groupliving
Next Steps

Public Outreach with proposed solutions
- Two solutions-oriented public open houses scheduled in mid-February 2020
  - Public Open House #1 | Tuesday, February 11 | 6 p.m. to 8 p.m. | Bruce Randolph School | 3955 Steele St.
  - Public Open House #2 | Saturday, February 22 | 9 a.m. to 11 a.m. | Goldrick Elementary School | 1050 S. Zuni St.
  - Public Open House #3 | 6 to 8 p.m. | Wednesday, February 26 | Hebrew Educational Alliance | 3600 S. Ivanhoe Street, Denver
  - Public Open House #4 | 6 to 8 p.m., Wednesday, March 4 | Scheitler Recreation Center (multipurpose room) | 5031 W. 46th Ave., Denver
- “Office Hours” meetings in late Feb and March

Public review of Redline Text Amendment
- Published on project website in late February/early March, with notification to RNOs (www.denvergov.org/groupliving)
- 30-day comment period

Public Legislative Review Process
- Planning Board (late March/early April)
- City Council Land Use, Transportation and Infrastructure Committee
- City Council Public Hearing

More Information, FAQ and contact information: www.denvergov.org/groupliving
Open House stations: details

**Residential Care**
- Permitted Zone Districts and Use Limitations (spacing, density) for Very Small, Small, Medium and Large facilities
- How proposals address GLAC problem statements
- Parking for Assisted Living, Nursing Homes and other facilities
- Establishment or expansion of Community Corrections and Shelter uses

**Definition of "Household"**
- What is and what is not a household
- Scenarios for various structure sizes
- How proposals address GLAC problem statements
- Artist, DIY and Cooperative housing

**Other Group Living**
- Permanent Tiny Home Villages
- Single-room Occupancy (SRO) and similar uses