

Group Living Code Amendment

Denver City Council
February 8, 2021
Public Hearing



Why is CPD proposing changes?

- Current regulations prohibit the residential care facilities our city needs and prevent people from sharing housing
 - Example: new community corrections uses are not allowed outside of industrial areas
- We have exclusionary regulations with roots in classism and racism
 - Example: Since 1954, groups of more than 2 unrelated people (“found” families, blended families and roommates) have only been allowed to live in multi-unit dwellings (duplexes, apartments, etc.) in Denver.
- We need a more equitable approach for locating residential care uses and we need to allow people to legally share housing costs
- We also need to fix problems with the Denver Zoning Code
 - Outdated and unclear language
 - Unpredictable permitting and notification requirements



“The community knows about us. We give back to the community, we maintained the block, cleaning it up, we cut neighbor’s grass and we helped our neighbors.”

- Maurice, formerly homeless, former Community Corrections resident, and Denver Rescue Mission worker

Summary of proposed changes:



Household Living

- Allow up to 5 adults of any relationship to live as part of a household



Congregate Living

- Consolidate all uses with more people than allowed in a household, but where care is not required, into a single use type: “Congregate Living”
- Clarify that rent-by-room is only allowed as congregate living in zone districts where higher-intensity residential uses are allowed – it is prohibited in low-intensity residential areas



Residential Care

- Consolidate all uses where care is required into a single use type: “Residential Care”
- Regulate by size, with spacing and density limitations for larger facilities
- Allow residential care uses in more places
- Require a community meeting prior to permit application for larger residential care facilities, and for halfway houses of any size

Revisions made during the LUTl process

Household Regulations

This discussion focuses on adults over age 18. There are no restrictions on how many related children can live in a house in any of these proposals.



“There are a lot of social benefits living in a community...I think it should **be accessible for people to choose those people they want to live with.**”

- Samantha, Cooperative Housing Resident and Elementary School Teacher

What's allowed now?

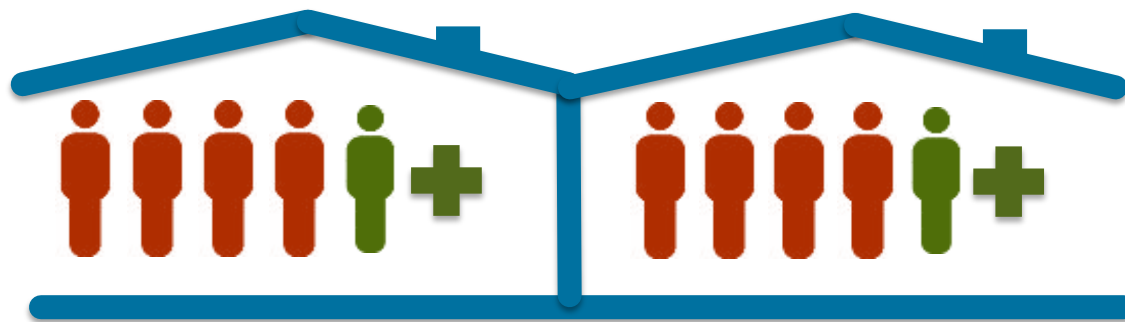
In one, detached home



Two unrelated adults
Unlimited relatives

No off-street parking requirement

In duplexes, apartments, condos (anything with 2 or more attached homes)



Four unrelated adults
Unlimited relatives

Has a minimum off-street parking requirement



= unrelated adults



= relatives

Peer City Household Regulations

Unrelated Adults Allowed 2	Avg HH size	Unrelated Adults Allowed 3	Avg HH size	Unrelated Adults Allowed 4	Avg HH size	Unrelated Adults Allowed 5	Avg HH size	Unrelated Adults Allowed 6	Avg HH size	Unrelated Adults Allowed 8	Avg HH size
Denver	2.31	Boulder	2.18	Aurora	2.82	Arvada	2.48	Austin	2.47	Seattle	2.12
Englewood	2.15	Commerce City	3.10	Brighton	2.92	Castle Rock	2.88	Portland, OR	2.36	Vancouver, WA	2.46
		Fort Collins	2.46	Golden	2.24	Co. Springs	2.52	San Diego	2.96		
		Littleton	2.25	Northglenn	2.71	Lakewood	2.30	Spokane	2.43		
		Loveland	2.55	Thornton	2.86	Longmont	2.60				
		Wheat Ridge	2.16	Westminster	2.62	Parker	2.94				
		Salt Lake City	2.48	Las Vegas, NV	2.66	Uninc. Adams Cty.	3.00				
		Minneapolis	2.25	Boston	2.37	Uninc. Arap. Cty.	2.66				
				New Orleans	2.44	Albuquerque	2.48				
						Boise	2.46				
						Kansas City	2.36				
						Oklahoma City	2.59				
						Phoenix	2.87				
						Aspen	1.94				
						Crested Butte	2.00				
						Telluride	2.19				
Avg HH	2.23		2.43		2.63		2.52		2.56		2.29

Notes: All cities permit unlimited adult relatives to live as a household. Most cities cap the size of a household where not all adults are related.
Sources: U.S. Census Bureau Quick Facts; city and county zoning regulations
Average U.S. Household Size (2019): 2.51

LUTI Discussion (Sept. – Dec. 2020): Concerns and Common Values

- Allowing **blended families and some number of unrelated** adults as a household, without a special permit
- Preventing **overcrowding** and **commercialization** of neighborhoods
- **External impacts**, such as parking, are what really matter
- Regulations should be **simple** to understand and enforce

Who Are We Serving?

- Multigenerational families
- Two families sharing housing
- Adults sharing housing as roommates or “found” family
- Couples who want/need to take a roommate
- Anyone who needs to share mortgage or rent costs
- Foster families*

*Requires a permit now, but these amendments would remove that barrier.

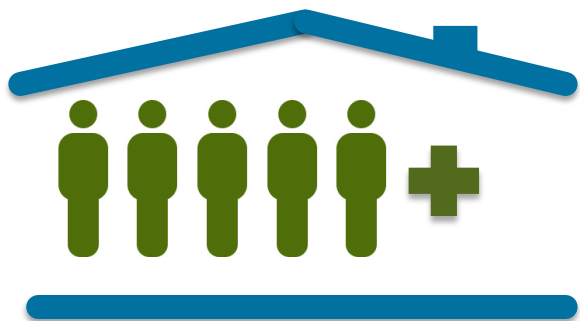


= unrelated adults



= relatives

What does the City Council Draft propose?



OR



- Allow households as follows:
 - ✓ Households of any number of people as long as all residents are related (*allowed now*)
- OR
- ✓ Households of up to 5 adults where all adults are not related
 - Allows 5 roommates, a blended family of 5 adults, etc.
 - Does not allow additional adult relatives
 - Does not allow additional adults in larger dwelling units

Residential Care

Examples of Residential Care facilities:

- shelters
- community corrections or “halfway houses”
- sober living
- rehabilitation facility
- assisted living
- nursing home
- hospice care



“The opposite of addiction is connection. **Having the ability to be in a community of recovery could be why I am so successful and [able to] be employed.**”

- Jill, former sober living resident and current manager of a recovery home

Summary of Proposed Changes

- **Consolidate** all uses where care is provided into a single type called “Residential Care”
- **Remove restrictions and buffers rooted in bias**
- Encourage more **equitable distribution** of residential care facilities citywide
- Require **community meetings** for larger facilities
- **Update requirements for spacing** between facilities and **density** limitations that prevent concentration of facilities in a given area.



LUTI Discussion (Sept. – Dec. 2020): Concerns and Common Values

- Allow people to access residential care in their communities and where they **have access to daily needs**
- Encourage **equitable distribution** of future facilities around the city and **prevent concentration**
- **Move away from regulations that exclude** people based on the type of care they need
- **Ensure Denver's compliance** with the Federal Fair Housing Act and other regulations
- Ensure facilities are not out of **scale** with neighborhoods

Who Are We Serving?

- People transitioning back into community after incarceration
- People in recovery
- People who are elderly and/or living with disabilities
- People who have experienced homelessness

What revisions were made at LUTI?

- Prohibit community corrections in **single unit (SU), two-unit (TU) and row house 2.5 (RH-2.5) zone districts**
- For “Type 1” facilities (10 or fewer guests), add a requirement to **limit the density of facilities** allowed within a 1-mile radius
- For “Type 2” facilities (11-40 guests on lots larger than 12,000 sq. ft.)
 - Reduce **maximum size to only 20 guests** in SU, TU and RH zone districts
 - In SU, TU and RH zone districts, only allow these facilities **on parcels previously in use for a civic, public or institutional use**, such as unused churches, schools, and government buildings (i.e., not in a house)

Community Corrections

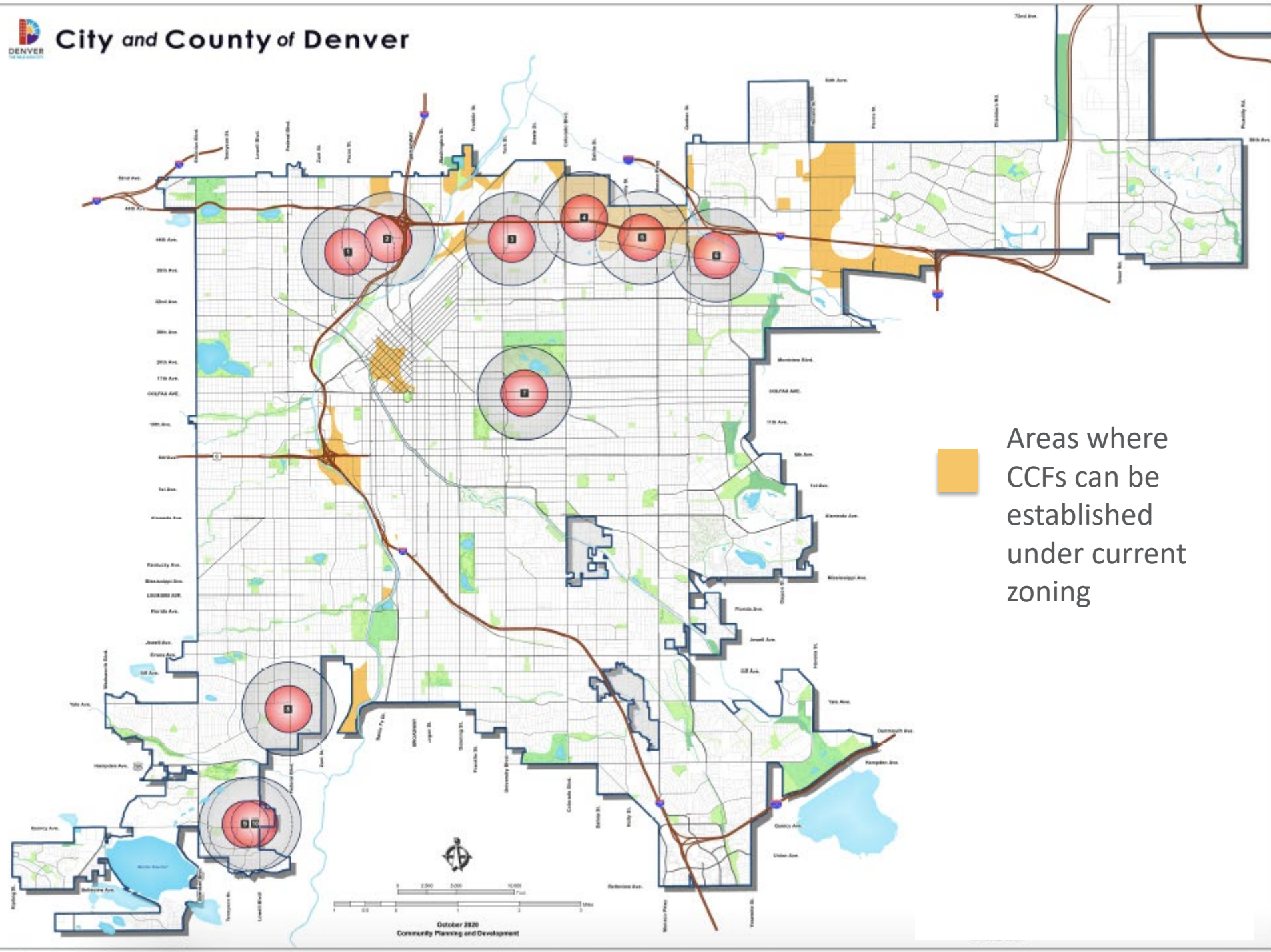


“The community corrections facility helped with everything, as far as my housing, healthcare, sobriety, living situation, and **gaining respect from the community**. [Independence House] offers everything like case management, a doctor on site, and it is **a great asset to the community.**”

- Maurice, formerly homeless, former community corrections resident, and Denver Rescue Mission worker

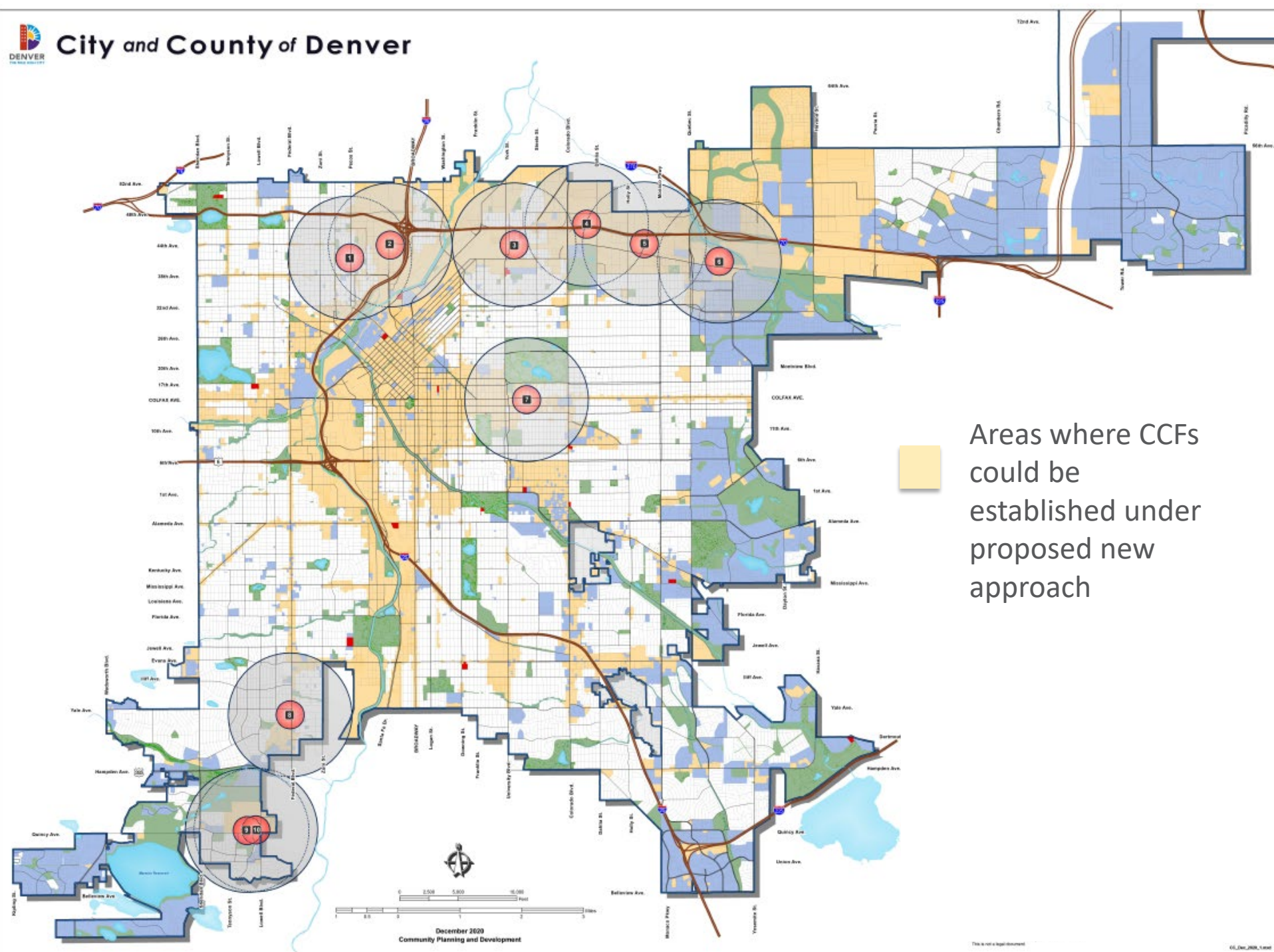
Current Community Corrections Facilities; buffers, and areas where new facilities could be established

- New facilities could be established in tan areas.
- Approximately 3,200 acres, or approximately 1,200 parcels, most in areas where these uses are already concentrated.
- Where 4,000' (grey) buffers overlap tan areas, presence of other Large Residential Care Facilities would prohibit new CCFs



Proposed: Expand available space for community corrections, but not in SU, TU and RH-2.5 districts

- Creates a significant expansion of land available for these uses: **from ~3,210 acres today to ~19,000 acres (~15,000 parcels)**
- Would allow these uses on commercial corridors around the city, where there are structures that could accommodate them and access to transit, jobs, and daily needs.



Staff Report

Available for download in its entirety at
www.denvergov.org/groupliving



“We deserve the right to live just like anybody else. **Think about your most vulnerable relative** and wonder what would happen to them if you weren’t there. Where will they go? So, this [tiny home village] is providing a place for that.”

- Luna, tiny home village resident

Three-year Public Process

March 2018 – May 2020	36 Group Living Advisory Committee meetings to define problem, identify and refine solutions. All meetings open to the public and summaries available online.
March 2018 – present (ongoing)	50 public meetings and presentations to Registered Neighborhood Organizations, Inter-Neighborhood Cooperation (INC) and other community groups
August 14, 2018	Public open house held to review and discuss problem statements
January 31, 2020	City Council Briefing (during annual retreat)
February 29, 2020	Planning Board Informational Item
February 11, 22, and 26, and March 4, 2020	Public open houses in locations around the city to present proposed amendments, answer questions, and receive feedback
July 29, 2020	Planning Board informational item
August 3, 2020	CPD written notice of the Planning Board public hearing sent to all members of City Council and registered neighborhood organizations
August 19, 2020	Planning Board Hearing Unanimous Recommendation of Approval (9-0)

Public Process continued: Land Use, Transportation and Infrastructure Committee (LUTI)

Sept. 1 (full meeting)	Introduction of Topic
Sept. 29 (partial meeting)	Follow-up from 9/1 LUTI Proposed Schedule Household Regulations introduction
Oct. 6 (full meeting)	Household Regulations: alternatives and revisions
Nov. 3 (partial meeting)	Residential Care introduction
Nov. 10 (full meeting)	Residential Care regulations Community Corrections Proposed “Type 2” size/lot minimums/locations
Nov. 17 (full meeting)	Former Chapter 59 Enforcement Post-adoption monitoring
Dec. 1 (full meeting)	Wrap-up and final discussion
Dec. 22	Final LUTI Committee action

Planning Board and LUTI Recommendations

Planning Board: Unanimous recommendation of approval, with conditions:

1. Request CPD report to Planning Board annually for four years on how well the amendment is achieving the intended goals and unintended consequences particularly in areas vulnerable to displacement. (9-0)
2. Recommend approval with a revision to require a community information meeting prior to application for a Residential Care Type 1 Community Correction Facility in SU, TU, and RH zone districts. (9-0)

LUTI: Unanimous vote to send to City Council after revisions (see slide 13)

Outreach and Project Awareness



5

Community workshops

60

Meetings with community organizations

36

Public advisory committee meetings



26

Newsletters and updates

20+

Media articles



40

Advisory Committee members from all walks of life



Rhinocerop利斯 site visit, 2018

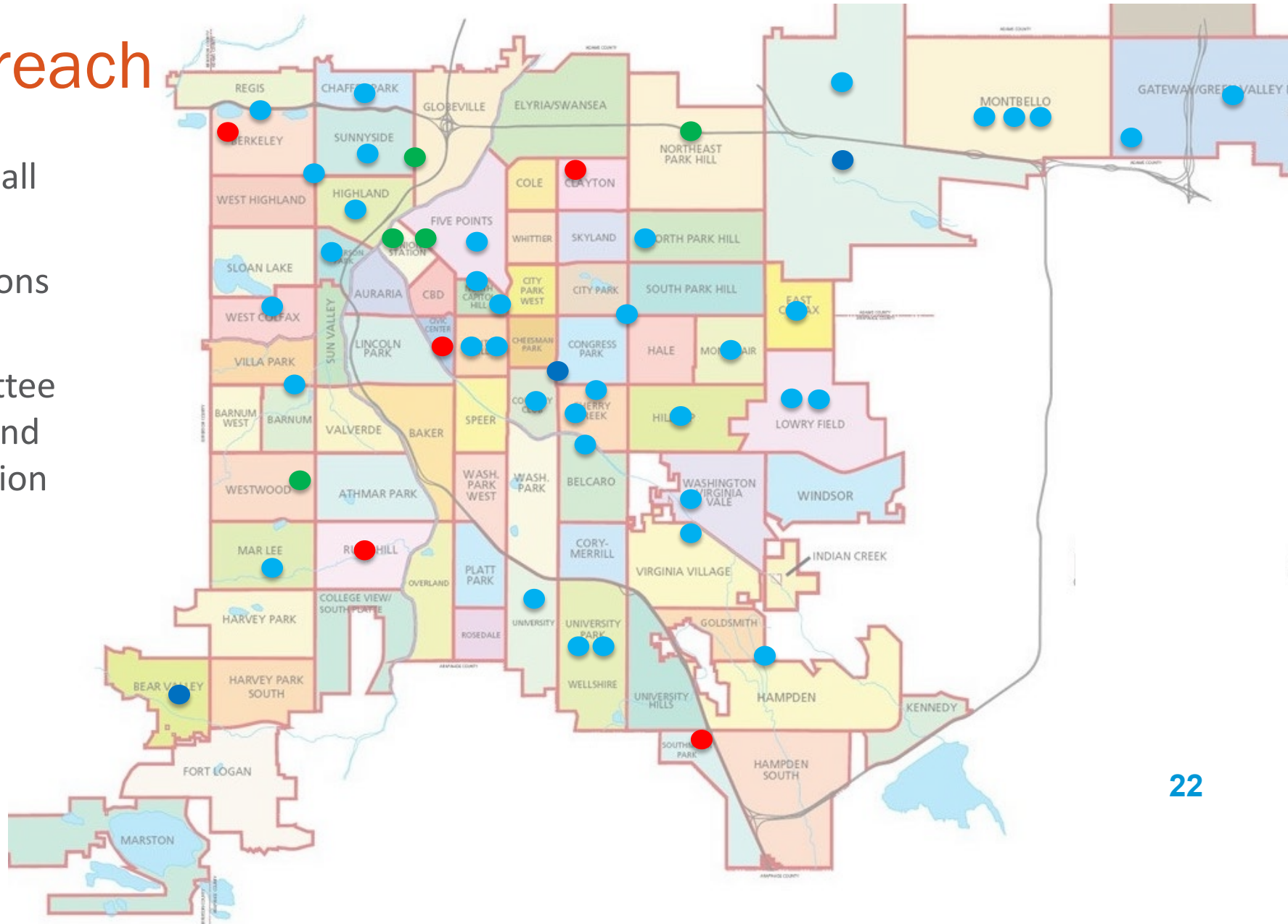


Problem Statement public open house, fall 2018

Neighborhood Outreach

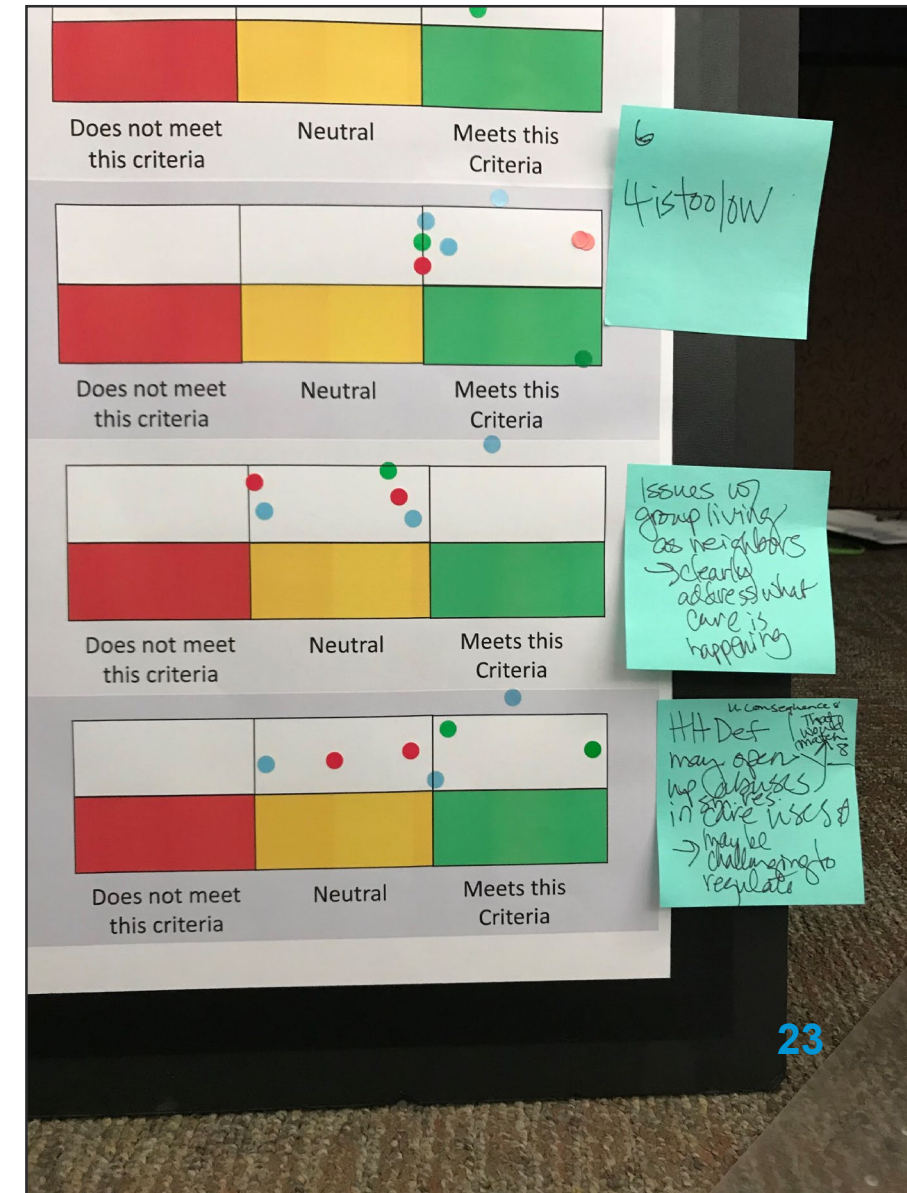
- Staff presentations offered to all RNOs in Spring 2020
- More than 39 RNO presentations made as of December 2020
- Group Living Advisory Committee representation from 8 RNOs and Inter-Neighborhood Cooperation

- Public Open House
- RNO Meeting or Council District Presentation
- Upcoming Presentations
- Meeting or Site Visit



Community Feedback

- Thousands of comments and several petitions received
- Majority of opinions expressed to date have been in opposition
 - Changes arrived at through the LUTI process address many of the concerns expressed in opposition letters
- Members of more than 20 Registered Neighborhood Organizations voted to oppose these changes, including (but not limited to):
 - Lowry, Montbello, Cherry Creek, Country Club, Cranmer Park/Hilltop Civic Association, Country Club
- 40 community groups and some Registered Neighborhood Organizations support these changes, including (but not limited to):
 - Baker, Curtis Park, Chaffee Park, Capitol Hill United Neighbors
 - Denver Classroom Teachers Association; CO Center on Law and Policy, Interfaith Alliance of Colorado, East Colfax Community Collective, Enterprise Community Foundation, Mothers Advocate for Affordable Housing



Consistency with Adopted Plans

Review Criteria (DZC Sec. 12.4.11)

1. Consistency with Adopted Plans
 - Comprehensive Plan 2040 (2019)
 - Blueprint Denver (2019)
 - Housing an Inclusive Denver (2018)
2. Public Health, Safety and Welfare
3. Uniformity of District Regulations and Restrictions

Comprehensive Plan



- Implements city policies for creation of complete range of housing option in every neighborhood
- Promotes programs to help individuals and families, especially those most vulnerable to displacement, reduce housing costs
- Helps ensure that city regulations enable a range of flexible housing options to meet the needs of all residents



- Expanded outreach, meeting requirement helps strengthen trust and communication between the city and all neighborhoods
- Renter outreach, community information meeting requirement helps improve the engagement and representation of all Denverites, including communities of color, in neighborhood groups and city processes

Blueprint Denver

- Ensures land use regulations “support modern and equitable approaches to housing options...”
- “...provide a more inclusive definition of households.”
- expands “the allowance of flexible and affordable housing types”
- Developed through “robust and inclusive community input process”



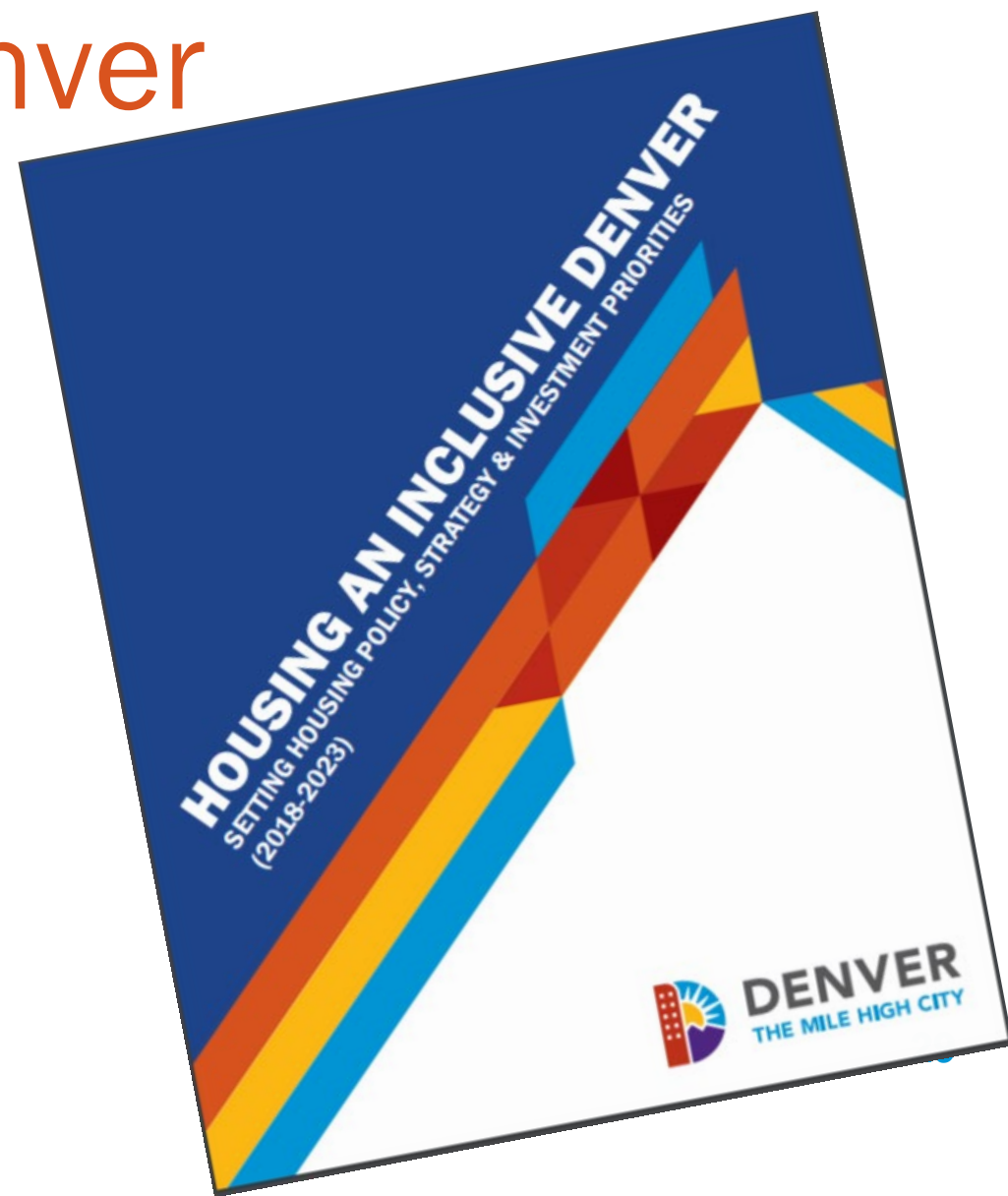
Blueprint Denver, continued



- Expands flexible housing opportunities citywide.
- Enables providers to increase the range of housing options so that people of all incomes and life circumstances can live where they have access to health care, food and other daily needs.
- Allows people to choose how they want to live, without fear that housing is in violation of zoning.
- Allows for creative new and re-emerging housing types like single-room occupancy, tiny home villages, co-living and other approaches, subject to existing building and safety regulations.

Housing an Inclusive Denver

- Expands options for residents experiencing homelessness
- Allows provider integration across housing continuum
- Allows for evolving models of residential care and housing



Review Criteria (DZC Sec. 12.4.11)

1. Consistency with Adopted Plans

- Comprehensive Plan 2040 (2019)
- Blueprint Denver (2019)
- Housing an Inclusive Denver (2018)

2. Public Health, Safety and Welfare

- Furthers public health safety and welfare by implementing adopted policies for enabling more housing options for all populations, removing barriers to obtaining legal and safe housing, rectifying discriminatory zoning codes, and by creating more predictable, transparent city processes.

3. Uniformity of District Regulations and Restrictions

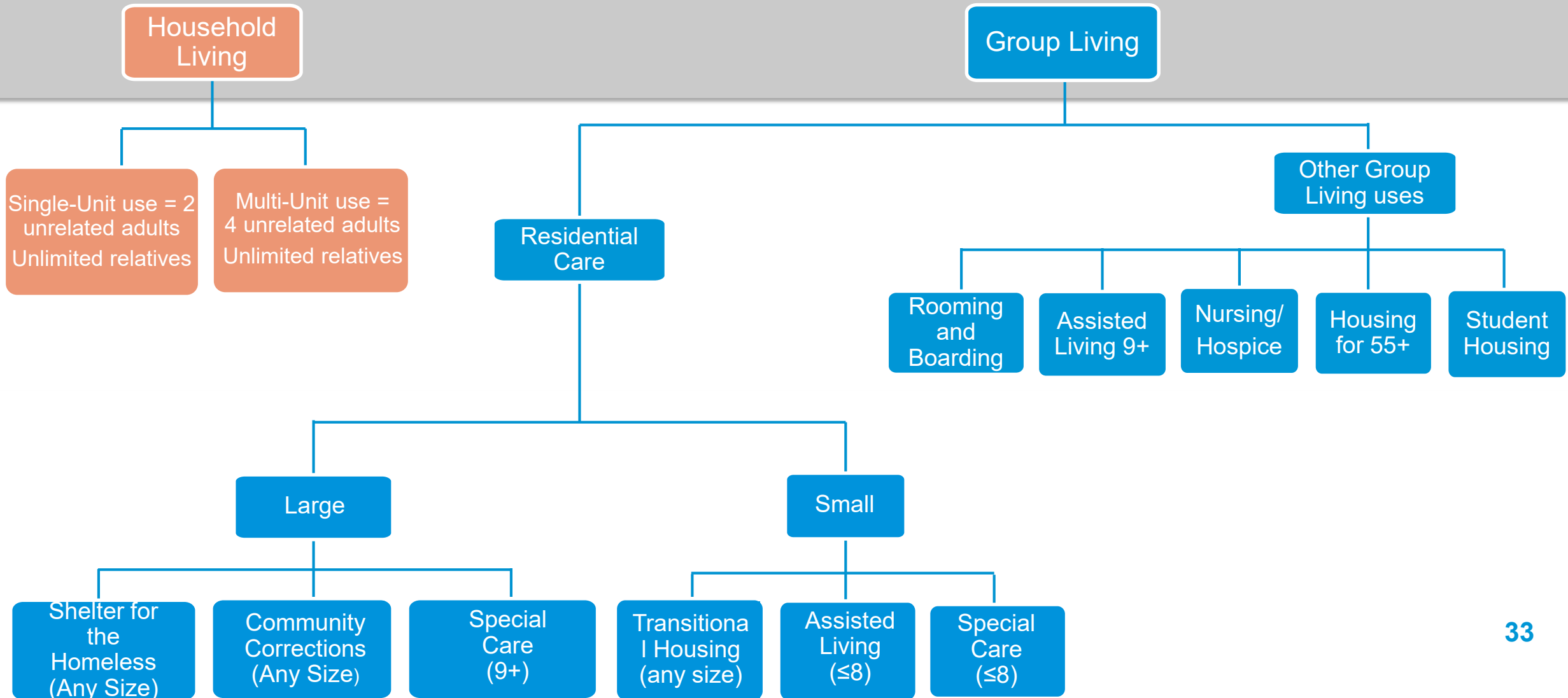
- Will result in processes and regulations residential uses that are uniform within each zone district in which these uses are allowed.

CPD Recommendation

Staff recommends that the Council adopt this text amendment, based on a finding that all review criteria have been met.

Extra Slides

CURRENT org-chart breakdown of Primary Residential Uses



Proposed org-chart breakdown for Primary Residential Uses

34

Household Living

- Up to 5 unrelated adults living as a single, non-profit housekeeping unit; or
- A group of people who are related, living as a single, non-profit housekeeping unit.
- Permanent residency

Examples:

- Conventional Housekeeping units of related people or groups of people who choose to live together
- Cooperative Housing
- Multigenerational housing
- Some types of sober living

Congregate Living

- Housing for more people than would be permitted in a household
- Not living as a single housekeeping unit
- May have shared cooking, bathroom and common areas
- Permanent residency
- Allowed only in higher-intensity zone districts

Examples:

- Rooming and Boarding
- Dormitory or Student Housing
- Permanent Tiny Home Village
- Single-Room Occupancy Housing

Residential Care

- On-premises treatment, custodial supervision, emergency shelter, protective oversight or assistance required as a condition of residency
- Temporary to permanent residency

Examples:

- Shelters
- Some types of sober living
- Community Corrections and Halfway Houses
- Solutions/Navigation Centers with residential component
- Assisted Living
- Nursing home or hospice
- Transitional Housing

If adopted, what regulations would the LUTI draft change?



Current

- **Small:** 8 or fewer guests (or up to 100 guests for no more than 120 days/year)
 - 6,000 square-foot min. lot size
- **Large:** 9 or more guests
 - In SU, TU and RH zone districts, must be in a structure built before May 24, 1993
 - Cap of 20 guests in SU, TU and RH districts
 - 6,000 square-foot min. lot size
 - Spacing and Density requirements
- **Shelters and Community Corrections**
 - Additional buffers required from other uses
 - Additional limits on zone districts

Proposed

- **Type 1:** 10 or fewer guests, or up to 100 guests for no more than 130 days/year (an existing provision in the code)
 - Density limitations in SU, TU and RH
- **Type 2:** 11 to 40 guests (max 20 in SU, TU and RH)
 - 12,000 square-foot min. lot size in SU, TU, RH
 - In SU, TU and RH districts, may only be on a parcel previously used for a Civic, Public or Institutional use.
- **Type 3:** 41 to 100 guests
 - Allowed only in higher-intensity zone districts
 - Spacing Requirements
- **Type 4:** 101+ guests
 - Allowed only in higher-intensity zone districts
 - Spacing and Density Requirements
- **Community Corrections:**
 - not permitted in SU, TU and RH-2.5 zone districts



Proposed Residential Care Regulations

Resid. Care Size	Type 1	Type 2	Type 3	Type 4
Number of Guests	10 or fewer (365 days/year) or up to 100 for no more than 130 days/year	11-40 (20 in low-intensity zone districts)	41-100	101+
Minimum Lot Size	NA	<ul style="list-style-type: none"> 12,000 square feet Only where previously used for Civic, Public, or Institutional Use in SU, TU and RH 	NA	NA
Permitted Zone Districts	<ul style="list-style-type: none"> All districts that permit residential uses Community Corrections not permitted in SU, TU and RH-2.5 	<ul style="list-style-type: none"> All districts that permit residential uses Community Corrections not permitted in SU, TU and RH-2.5 	<ul style="list-style-type: none"> Higher-intensity zone districts that permit apartments, commercial uses, etc. Not permitted in single-unit, two-unit or rowhome districts 	<ul style="list-style-type: none"> Highest-intensity zone districts that permit apartments, commercial uses, etc. Not permitted in single-unit, two-unit or rowhome districts, or in lower-intensity multi-unit districts
Spacing Requirements	NA	NA	<ul style="list-style-type: none"> 1,200' between Type 3 and Type 4 facilities in medium-intensity districts like multi-unit. 600' between Type 3 and Type 4 facilities in high-intensity districts like Urban Center 400' between Type 3 and Type 4 facilities in some Downtown districts 	<ul style="list-style-type: none"> 1,200' between Type 3 and Type 4 in medium-intensity districts like multi-unit. 600' between Type 3 and Type 4 in high-intensity districts like Urban Center 400' between Type 3 and Type 4 in some Downtown districts
Density Requirements	No more than 3 Residential Care facilities of any type within 1 mile of a proposed Type 1 in SU, TU or RH districts	NA	NA	No more than 3 Type 3 and Type 4 facilities within 1 mile of a proposed Type 4 Residential Care Facility
Community Information Meeting	Not required	Required in SU, TU, RH districts	Required	Required



= unrelated adults



= relatives

What did CPD and the Group Living Advisory Committee originally propose?

Proposed in early 2020 at Open Houses

- Up to 8 adults of any relationship in any dwelling unit
- Provisions for more unrelated adults in larger dwelling units, with no maximum





= unrelated adults



= relatives

What was approved at Planning Board and originally recommended to LUTI?



Proposed

- Up to 5 adults of any relationship, with unlimited relatives to each, in any dwelling unit
- Provisions for more unrelated adults in larger dwelling units, to a maximum of 10
- Minimum off-street parking requirements for large households in all homes

Household Regulation Details: Non-Profit Housekeeping Unit

Non-Profit Housekeeping Unit.

A household comprised of people who live together as a family or as the functional equivalent of a family, and who share household activities and responsibilities, such as meals, chores, rent, and expenses. The choice of specific adults comprising the single non-profit housekeeping unit is determined by the members of such housekeeping unit rather than by a landlord, property manager, or other third party. Members of a single non-profit housekeeping unit are not required to seek services or care of any type as a condition of residency. All adult residents jointly occupy the entire premises of the dwelling unit.

Household Regulation Details: relatives

...any persons related to each unrelated adult by blood, marriage, civil union, committed partnership, adoption, or documented responsibility (such as foster care or guardianship)

Spacing Requirement: How this tool works



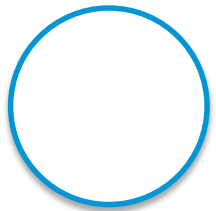
Proposed Residential Care
Subject Site (hypothetical)



Existing Residential Care



Existing Residential Care



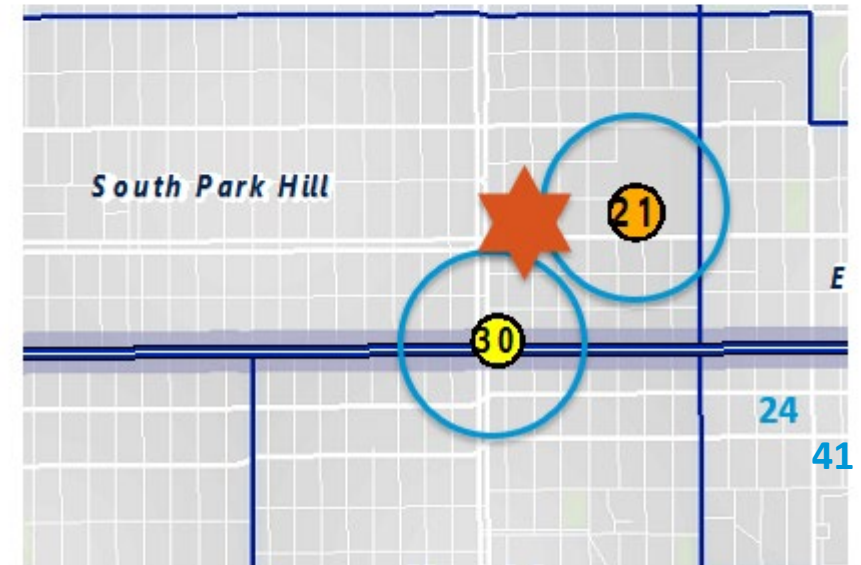
1,200 foot (appr. 3-block) required
spacing between facilities

As proposed, would apply to Type 3 and Type 4
Residential Care facilities






Proposed use
permitted



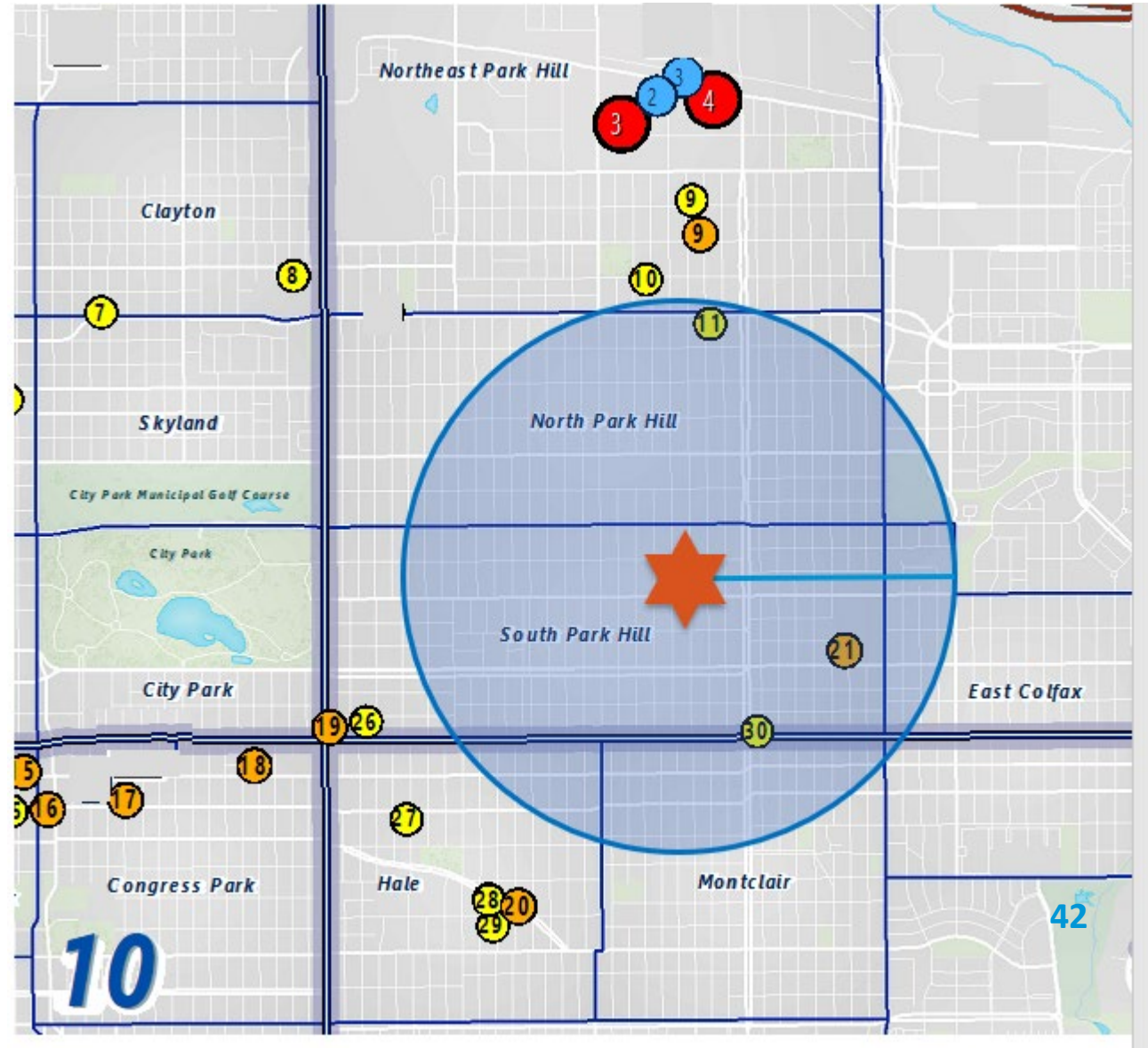
Proposed use
not permitted



Density limits: How they work

-  Proposed Residential Care Type 1 Subject Site (hypothetical)
-  Existing Residential Care Type 1
-  Existing Residential Care Type 2
-  Existing Residential Care Type 3
-  Existing Residential Care Type 4

As proposed for Type 1 Residential Care uses:
No more than 3 Residential Care uses within 1-mile radius of a subject site for a Type 1 Residential Care facility. In this example, a new Residential Care Type 1 use would be allowed. If the subject site were slightly further north, the use would not be allowed.





Proposed Congregate Living Regulations

- Congregate Living would be defined as any use where residents don't live in a self-contained dwelling unit, or who live in a conventional dwelling unit but do not have access to the entire dwelling, are on separate leases or exceed the number of adults permitted in a Household. Residents are not required to seek care or services as a condition of residency.
- This use includes, but is not limited to:
 - Rooming and boarding houses
 - Dormitories and other student housing
 - Tiny Home Villages
 - Single-room occupancy (SRO) housing
- As is currently the case for Rooming and Boarding Houses, dormitories and other uses currently identified in the code, Congregate Living would be permitted in zone districts that allow higher-intensity multi-unit housing, including:
 - Multi-Unit (MU)
 - Mixed Use (MX)
 - Main Street (MS)
 - Campus (CMP)

Congregate Living Details: Parking

Congregate Living Parking Requirements:

- Vehicle: 1 space/1,000 square feet of gross floor area (GFA) in most districts; .5/1,000 sf GFA in Urban Center, 0 in most Downtown districts.
- Bicycle: 1/4,000' GFA (D, descending thereafter)

Example: An Co-living development in the Urban Neighborhood Context with a building square footage of 25,000 (including shared living areas, bathrooms, community space.) serving 100 residents: **25 spaces**

Residential Care Details: Parking

Residential Care Parking Requirements:

- Vehicle: .5 spaces per 1,000 square feet of gross floor area (GFA) in most districts. .25/1,000 sf GFA in Urban Center. 0 in most Downtown districts.
- Bicycle: 1/8,000' GFA (Downtown, and descending thereafter)

Example: An Assisted Living Facility in the Urban Neighborhood Context with a building square footage of 25,000 (including a welcome center, community rooms, kitchens, etc.): **13 vehicle spaces**.

Details: Community Information Meeting



- Staff provides Community Information Meeting
- Applicant notifies and holds meeting for neighbors
- May enter into private agreements (Good Neighbor, etc.)
- Applicant provides record of meeting and any applicable commitments or agreements
- Some commitments may be conditions of zoning permit

Concerns Raised

Household Size:

- Parking
- Maintenance
- Commercial “rent-by-the-room” uses and impact on property values
- Enforcement

Community Corrections uses in neighborhoods:

- Safety
- Property values

Responses and revisions made:

- Revisions would only allow **maximum of 5 adults** in households where not all residents are related.
- Strengthened definition language to clarify “non-profit housekeeping unit”
- Existing regulations on lawn parking, work trucks, etc. would not change
- Revisions would **prohibit Community Corrections uses in lowest-intensity residential zone districts** (single-unit, two-unit and row house-2.5)
- Dept of Safety review requirement

Concerns Raised (cont.)

Spacing for smallest Residential Care uses

- Concentration of facilities

Larger Residential Care Uses in Single-unit neighborhoods

- Safety

General property value impacts

- Proximity of residential care uses
- perception of rental units

Responses and revisions made:

- Revisions include a new density limitation for Type 1 Residential Care facilities
- Goals include removing barriers to distributed, smaller-scale facilities as alternative to large facilities that concentrate populations.
- These uses are a small fraction of all residences in Denver (~75 small residential care/transitional housing facilities, vs. ~380,000 total households)
- Non-zoning safety/security requirements
- Studies have found that residential care uses do not significantly impact property values
- Ensuring housing of all types

Concerns Raised (cont.)

Advisory Committee makeup

- Inclusion of provider representatives

Project Scope

- Household and Residential Care updates in single amendment

Responses and revisions made:

- Objective: broad range of perspectives and lived experiences to help us develop forward-thinking and fair zoning codes.
- Multiple RNO/neighborhood representatives
- City Council participation
- Public events sought broader perspectives
- GLAC process open to public, detailed records available
- Goal: simplify complicated, highly-interrelated regulations
- Relationship between different types of residential uses
- Holistic approach to housing of all types

Proposed changes received directly from councilmembers

Proposed amendments received from council	Will this be addressed in the new proposal?
Remove adding another adult per 200 square feet over the median Denver house structure size of 1,600 square feet	YES – this provision will be removed for households that have unrelated adults
Hard cap of 4 or 5 (exception for group homes for protected classes)	YES – we will have a hard cap for households that have unrelated adults
Building code issues for larger households, parking, etc.	YES – the provision to allow even larger households will be removed
Preserve existing codes that allow unlimited relatives to live together	YES – Any number of related people can still live together

Proposed changes received directly from councilmembers

Proposed amendment received from council	Could this be addressed with a proposed alternative?
Remove community corrections from SU, TU and RH zones because pre-parole felons are still in state custody and it is legitimate to regulate this use as different from senior living and other group home protected classes.	YES – We could remove community corrections from SU and TU zone districts. We recommend allowing it in RH zone districts, which already allow other more intensive uses.
Remove Type 2 facilities of any type from SU, TU and RH zones on the basis that a facility holding 40 people is out of character in such zones.	YES – In these zone districts, we could limit these facilities to existing structures originally constructed for a Civic, Public or Institutional use; prohibit them in houses; and explore a reduction in overall size.
Overconcentration of the smallest residential care facilities (Type 1) should be prevented.	YES – We could establish density limitations for Type 1 facilities, which will prevent a new Type 1 location if there are more than three Residential Care uses already within a 1-mile radius.