



Howard County Maryland
Department of Planning and Zoning
3430 Courthouse Drive, Ellicott City, MD 21043

(410) 313-2350
www.howardcountymd.gov

DPZ Office Use only:
Case No ZRA 214
Date Filed 5/29/2025

Zoning Regulation Amendment Petition

Zoning Regulation Amendment Request:

The ZRA would create a new conditional use to allow Age-Restricted Adult Housing apartments in the R-ED, PGCC, R-20, R-12, R-SC, R-SA-8, and R-H-ED provided that the property adjoins a B-1 zone and is within 1,000 feet of the intersection of two arterial roads. The conditional use would allow up to 20 units per acre and have a 15% MIHU requirement.

Petitioner Information

Name: Woo Yong Jung
Trading As: Yale Presbyterian Church, Inc
Address: 4852 Montgomery Road, Ellicott City, MD, 21043
Phone: 4436300507
Email: ephriamjung@hotmail.com
Petitioner's Interest in the Property: Sole Owner



Representative Information

Name: Tom Coale
Address: 54 State Circle, Annapolis, MD, 21401
Phone: 4436300507
Email: tom@perryjacobson.com
Profession: Attorney

Property Information

Property Address: 4852 Montgomery Road, Ellicott City, MD, 21043
Total Site Area: 8.6 acres Use Area (if different): Tax Map: 31 Grid: 7 Parcel: 310
County Council District: 2 Zoning District: R-20
Subdivision Name: SDP #:

Zoning Regulation Amendment Information

Please provide a brief statement concerning the reason(s) the requested amendment(s) to the Zoning Regulations is (are) being proposed:

While Howard County has experienced the growth of age-restricted adult housing units in response to development restraints on market rate units with school-aged children, there has been a notable absence of such units in the form of apartments. Similarly, there have been almost no new age-restricted adult units built for rent. The absence of rental units limits the availability of age-restricted adult housing for renter households or seniors who do not have the capital to purchase a new unit. While higher density zones allow age-restricted adult housing apartments, the market demand for market rate apartments makes it unlikely such parcels would be developed for senior housing. Petitioner is proposing that those parcels of land that adjoin medium intensity commercial districts (B-1) that are also proximal to the intersection of arterial roads may be allowed to petition for a higher density ARAH conditional use that would allow up to 20 units per acre. The neighborhoods in which this form of conditional use would be allowed would already be attuned to the development intensity of the commercially zoned district and the neighboring intersection such that the apartment buildings would provide a transition to surrounding residential zones.

The Legislative Intent of the Zoning Regulations in Section 100.0.A. expresses that the Zoning Regulations have the purpose of "...preserving and promoting the health, safety and welfare of the community." Please provide a detailed justification statement demonstrating how the proposed amendment(s) will be in harmony with this purpose and the other issues in Section 100.0.A.

Howard County is aging. In 2010, the median age was 34.7 years, while in 2019, it was 37.8 years. Between 2010 and 2022, the population of people aged 65 and older in Howard County increased by 75.8%, while the 0 to 4 age group grew by only 3%. Without viable and affordable options for seniors to downsize, they will continue to live in homes that are bigger than they need and too expensive to maintain on fixed incomes. The proposed Amendment will preserve and promote the health, safety and welfare of the community by addressing the complete dearth of apartments dedicated exclusively to those 65 years of age and older. This Amendment will also revitalize lagging commercial sectors by providing walkable connectivity between new senior apartments and existing retail commercial.

Does the amendment, or do the amendments, have the potential of affecting the development of more than one property, yes or no? If yes, and the number of properties is less than or equal to 12, explain the impact on all properties affected by providing a detailed analysis of all the properties based upon the nature of the changes proposed in the amendment(s). If the number of properties is greater than 12, explain the impact in general terms.

The amendment would affect all parcels adjoining B-1 zones within 1,000 feet of the intersection of two arterial roads. Petitioner does not have the resources available to indicate whether this would affect more than 12 parcels, but believe the number of affected parcels would be small in number. Moreover, any parcel impacted by the amendment would need to apply for a conditional use in order to develop under the proposed amendment.

Provide the address, Tax Map, and Parcel Number for any parcel of land known to be affected by the amendment(s) that the Petitioner owns or has a legal or equitable interest in.

See above.

Zoning Regulation Amendment Criteria

The compatibility, including potential adverse impacts and consequences, of the proposed zoning regulation amendment with the existing and potential land uses of the surrounding areas and within the same zoning district.

This amendment is not only compatible with surrounding uses, but would be beneficial to existing commercial and provide walkable connected housing for aging seniors.

The properties to which the zoning regulation amendment could apply and, if feasible, a map of the impacted properties.

See above.

Conflicts in the Howard County Zoning Regulations as a result of the zoning regulation amendment.

None.

The compatibility of the proposed zoning regulation amendment with the policies and objectives, specifically including the environmental policies and objectives, of the Howard County General Plan.

HoCo By Design explicitly supports, and is in harmony with, this proposed Zoning Regulation. DN-12 Policy Statement recommends that lawmakers “[p]rovide a range of affordable, accessible, and adaptable housing options for older adults and persons with disabilities.” The General Plan then offers the following Implementing Actions:

1. Use zoning tools and incentives that increase the supply of missing middle housing and accessory dwelling units, as identified in Policy Statements DN-1 and DN-2.
2. Provide flexibility in the Zoning Regulations and the Subdivision and Land Development Regulations for adult group homes/communal living and for accessibility modifications for persons with disabilities who wish to live independently or older adults who wish to age in place or downsize and age in their community at affordable price points.
3. Encourage Age-Restricted Adult Housing (ARAH) developments to build small- to medium-scale housing units to include apartments, condominiums, townhomes, and missing middle housing types that allow seniors to downsize and are affordable to low- and moderate-income households. Evaluate if current ARAH Zoning Regulations allow sufficient density increases to incentivize missing middle housing types, such as cottage clusters, duplexes, and multiplexes.

HoCo By Design at Chapter 6: Dynamic Neighborhoods DN-62 (emphasis added). The General Plan also supports the co-location of senior housing with accessible retail commercial development: According to the Age-Friendly Howard County Initiative and AARP, age-friendly communities are “safe and secure, have affordable and appropriate housing and transportation options, and offer supportive community features and services.” There should be sidewalks with safe crossable streets for pedestrians, dedicated bicycle lanes, and public transit options.

Id. at DN-59.

As demonstrated above, the General Plan strongly supports providing ARAH apartments in close proximity to retail commercial with walkable connectivity between the properties. The proposed ZRA creates additional modalities of senior housing not available in most zones under the existing conditional use and requires such developments demonstrate pedestrian connectivity between the ARAH development and surrounding commercial.

If the zoning regulation text amendment would impact eight (8) parcels of land or less:

- (i) A list of those impacted parcels;
- (ii) The address of each impacted parcel;
- (iii) The ownership of each impacted parcel; and
- (iv) The contact information for the owner, if an individual, or resident agent or owner, if a corporate entity, of each impacted parcel.

See above.

Signatures

The undersigned hereby affirms that all of the statements and information contained in, or filed with this petition, are true and correct.

Petitioner's Signature Signed by: 정우용 Date 6/8/2025

Property Owner's Signature Signed by: 정우용 Date 6/8/2025
A06276214BDC480...
Wooyongjung

Process information and submittal requirements can be found on the [ProjectDox website](#)

Petitioner's Proposed Text
ARAH Commercial Transition ZRA

Amend Section 131.0.N.1. to add:

d. Age-Restricted Adult Apartments, Commercial Transition

A Conditional Use may be granted in the R-ED, PGCC, R-20, R-12, R-SC, R-SA-8, and R-H-ED for age-restricted adult apartments, provided that:

- (1) Subject property adjoins a B-1 zoning district and is within 1,000 feet of the intersection of two collector roads;
- (2) Site design and landscaping must provide a transition from adjoining commercial development and surrounding residential. To achieve this:
 - (a) Petitioner shall provide pedestrian connectivity between Age-Restricted Adult Apartments, adjoining commercial, and surrounding residential development
 - (b) Grading and all landscaping shall retain and enhance elements that allow the site to blend and be compatible with surrounding uses.
 - (c) The project shall be compatible as transitional structures between commercial and residential development by providing either:
 - (i) An architectural transition with buildings near the perimeter that are similar to neighboring dwellings in materials and architectural detail as demonstrated by architectural elevations or renderings submitted with the petition, or
 - (ii) Additional buffering along the perimeter of the site, through retention of existing forest or landscaping, enhanced landscaping, berms or increased setbacks.
- (3) The following criteria shall be met:
 - (a) No more than 20 units permitted per gross acre.
 - (b) The apartment units are limited to age-restricted adult housing. The petition must include copies of proposed deed restrictions or covenants that establish how the age restrictions required under the definition of age-restricted adult housing will be implemented and maintained.
 - (c) The dwellings will incorporate universal design features from the Department of Planning and Zoning Guidelines that identify required, recommended, and optional features. The petition shall include descriptions of the design features of proposed dwellings to demonstrate their appropriateness for the age-restricted populations. The materials submitted shall indicate how universal design features will be used to make individual dwellings adaptable to persons with mobility or functional limitations and how the design will provide accessible routes between driveways, sidewalks, common areas and dwelling units.
 - (e) The development has frontage on and direct access to a public road.
 - (f) The minimum lot size is eight gross acres.
- (4) The development shall comply with the following bulk requirements:
 - (a) Maximum Height:
 - (i) Principal Structures50 feet
 - (ii) Accessory Structures15 feet

- (b) Minimum structure and use setback from perimeter of development:
 - (i) From public street right-of-way40 feet
 - (ii) From RC, RR, R-ED, PGCC, R-20 or R-SC Districts, the setback applicable in the underlying zoning district.
 - (iii) From Zoning districts other than RC, RR, R-ED, PGCC, R-20 or R-SC20 feet
- (c) Minimum structure setback from interior roadway or driveway for units with garages20 feet
 - (d) Minimum structure setback from lot lines:
 - (i) Side10 feet
 - Except zero lot line dwellings0 feet
 - A minimum of 10 feet must be provided between structures
 - (ii) Rear10 feet
 - (e) Minimum distance between principal structures10 feet
- (5) At least 35% of the gross site area shall be open space or open area in accordance with the Subdivision and Land Development Regulations. The open space or open area shall provide amenities such as pathways, seating areas and outdoor recreation areas for the residents, and shall be protective of natural features.
- (6) Accessory uses may include social, recreational, educational, housekeeping, security, transportation or personal services, provided that the use of these services is limited to on-site residents and their guests.
- (7) At least 15% of the dwellings units shall be Moderate Income Housing Units.
- (8) At least one on-site community building or interior community space shall be provided that contains a minimum of:
 - (a) 20 square feet of floor area per dwelling unit, for the first 99 units with a minimum area of 500 square feet, and
 - (b) 10 square feet of floor area per dwelling unit for each additional unit above 99.
- (9) The Conditional Use plan and the architectural design of the building(s) shall have been reviewed by the Design Advisory Panel, in accordance with Title 16, Subtitle 15 of the Howard County Code, prior to the submission of the Conditional Use petition to the Department of Planning and Zoning. The Petitioner shall provide documentation with the petition to show compliance with this criterion.

SUPPLEMENT TO PETITION TO AMEND THE ZONING REGULATIONS OF HOWARD COUNTY

Yale Presbyterian Church, Inc., Petitioner

The proposed ZRA would create a special category for age-restricted adult housing apartments for those parcels that adjoin commercially zoned properties. There are two strong policy bases for this proposal. First, Howard County is experiencing a housing crisis that acutely impacts seniors. The existing age-restricted adult housing conditional use in the R-ED, PGCC, and R-20 only allows density up to five units per acre, which precludes apartments. The second rationale is that retail commercial continues to struggle in the context of online retailers. Providing seniors with walkable access to retail commercial will serve the dual purposes of increasing the value and performance of commercial property while enhancing the quality of life for seniors who may otherwise experience isolation.

A brief statement concerning the reasons for the requested amendment to the Zoning Regulations are as follows:

4. **Please provide a brief statement concerning the reason(s) the requested amendment(s) to the Zoning Regulations is (are) being proposed.**

While Howard County has experienced the growth of age-restricted adult housing units in response to development restraints on market rate units with school-aged children, there has been a notable absence of such units in the form of apartments. Similarly, there have been almost no new age-restricted adult units built for rent. The absence of rental units limits the availability of age-restricted adult housing for renter households or seniors who do not have the capital to purchase a new unit. While higher density zones allow age-restricted adult housing apartments, the market demand for market rate apartments makes it unlikely such parcels would be developed for senior housing. Petitioner is proposing that those parcels of land that adjoin medium intensity commercial districts (B-1) that are also proximal to the intersection of arterial roads may be allowed to petition for a higher density ARAH conditional use that would allow up to 20 units per acre. The neighborhoods in which this form of conditional use would be allowed would already be

attuned to the development intensity of the commercially zoned district and the neighboring intersection such that the apartment buildings would provide a transition to surrounding residential zones.

5. Please provide a detailed justification statement demonstrating how the proposed amendment(s) will be in harmony with the current General Plan for Howard County.

HoCo By Design explicitly supports, and is in harmony with, this proposed Zoning Regulation. DN-12 Policy Statement recommends that lawmakers “[p]rovide a range of affordable, accessible, and adaptable housing options for older adults and persons with disabilities.” The General Plan then offers the following Implementing Actions:

1. Use zoning tools and incentives that increase the supply of missing middle housing and accessory dwelling units, as identified in Policy Statements DN-1 and DN-2.
2. Provide flexibility in the Zoning Regulations and the Subdivision and Land Development Regulations for adult group homes/communal living and for accessibility modifications for persons with disabilities who wish to live independently or older adults who wish to age in place or downsize and age in their community at affordable price points.
3. Encourage Age-Restricted Adult Housing (ARAH) developments to build small- to medium-scale housing units to include apartments, condominiums, townhomes, and missing middle housing types that allow seniors to downsize and are affordable to low- and moderate-income households. *Evaluate if current ARAH Zoning Regulations allow sufficient density increases to incentivize missing middle housing types, such as cottage clusters, duplexes, and multiplexes.*

HoCo By Design at Chapter 6: Dynamic Neighborhoods DN-62 (*emphasis added*). The General Plan also supports the co-location of senior housing with accessible retail commercial development:

According to the Age-Friendly Howard County Initiative and AARP, age-friendly communities are “safe and secure, have affordable and appropriate housing and transportation options, and offer supportive community features and services.” There should be sidewalks with safe crossable streets for pedestrians, dedicated bicycle lanes, and public transit options.

Id. at DN-59.

As demonstrated above, the General Plan strongly supports providing ARAH apartments in close proximity to retail commercial with walkable connectivity between the properties. The proposed ZRA creates additional modalities of senior housing not available in most zones under the existing conditional

use and requires such developments demonstrate pedestrian connectivity between the ARAH development and surrounding commercial.

6. **The Legislative Intent of the Zoning Regulations in Section 100.A. expresses that the Zoning Regulations have the purpose of “...preserving and promoting the health, safety and welfare of the community.” Please provide a detailed justification statement demonstrating how the proposed amendment(s) will be in harmony with this purpose and the other issues in Section 100.A.**

Howard County is aging. In 2010, the median age was 34.7 years, while in 2019, it was 37.8 years.¹ Between 2010 and 2022, the population of people aged 65 and older in Howard County increased by 75.8%, while the 0 to 4 age group grew by only 3%.² Without viable and affordable options for seniors to downsize, they will continue to live in homes that are bigger than they need and too expensive to maintain on fixed incomes. The proposed Amendment will preserve and promote the health, safety and welfare of the community by addressing the complete dearth of apartments dedicated exclusively to those 65 years of age and older. This Amendment will also revitalize lagging commercial sectors by providing walkable connectivity between new senior apartments and existing retail commercial.

¹ <https://usafacts.org/data/topics/people-society/population-and-demographics/our-changing-population/state/maryland/county/howard-county/#:~:text=Census%20Bureau-How%20old%20is%20the%20population%20in%20Howard%20County?,3%25%20between%202010%20and%202022>.

² *Id.*

Howard County Zoning Regulations.

Section 131.0. Conditional Uses

N. Conditional Uses and Permissible Zoning Districts

1. Age-restricted Adult Housing

**D. AGE-RESTRICTED ADULT HOUSING APARTMENTS, COMMERCIAL
TRANSITION**

A CONDITIONAL USE MAY BE GRANTED IN THE R-ED, PGCC, R-20,
R-12, R-SC, R-SA-8, AND R-HE-D FOR AGE-RESTRICTED ADULT
APARTMENTS, PROVIDED THAT:

- 1) SUBJECT PROPERTY ADJOINS A B-1 ZONING DISTRICT AND IS
WITHIN 1,000 FEET OF THE INTERSECTION OF TWO
COLLECTOR ROADS;
- 2) SITE DESIGN AND LANDSCAPING MUST PROVIDE A
TRANSITION FROM ADJOINING COMMERCIAL DEVELOPMENT
AND SURROUNDING RESIDENTIAL. TO ACHIEVE THIS:
 - a. PETITIONER SHALL PROVIDE PEDESTRIAN
CONNECTIVITY BETWEEN AGE-RESTRICTED ADULT
APARTMENTS, ADJOINING COMMERCIAL, AND
SURROUNDING RESIDENTIAL DEVELOPMENT
 - b. GRADING AND ALL LANDSCAPING SHALL RETAIN AND
ENHANCE ELEMENTS THAT ALLOW THE SITE TO BLEND
AND BE COMPATIBLE WITH SURROUNDING USES.
 - c. THE PROJECT SHALL BE COMPATIBLE AS
TRANSITIONAL STRUCTURES BETWEEN COMMERCIAL
AND RESIDENTIAL DEVELOPMENT BY PROVIDING
EITHER:
 - i. AN ARCHITECTURAL TRANSITION WITH
BUILDINGS NEAR THE PERIMETER THAT ARE
SIMILAR TO NEIGHBORING DWELLINGS IN
MATERIALS AND ARCHITECTURAL DETAIL AS
DEMONSTRATED BY ARCHITECTURAL
ELEVATIONS OR RENDERINGS SUBMITTED WITH
THE PETITION, OR
 - ii. ADDITIONAL BUFFERING ALONG THE PERIMETER
OF THE SITE, THROUGH RETENTION OF EXISTING
FOREST OR LANDSCAPING, ENHANCED
LANDSCAPING, BERMS OR INCREASED
SETBACKS.
- 3) THE FOLLOWING CRITERIA SHALL BE MET:
 - a. NO MORE THAN 20 UNITS PERMITTED PER GROSS ACRE.
 - b. THE APARTMENT UNITS ARE LIMITED TO AGE-
RESTRICTED ADULT HOUSING. THE PETITION MUST
INCLUDE COPIES OF PROPOSED DEED RESTRICTIONS OR

- 1 COVENANTS THAT ESTABLISH HOW THE AGE
2 RESTRICTIONS REQUIRED UNDER THE DEFINITION OF
3 AGE-RESTRICTED ADULT HOUSING WILL BE
4 IMPLEMENTED AND MAINTAINED.
- 5 c. THE DWELLINGS WILL INCORPORATE UNIVERSAL
6 DESIGN FEATURES FROM THE DEPARTMENT OF
7 PLANNING AND ZONING GUIDELINES THAT IDENTIFY
8 REQUIRED, RECOMMENDED, AND OPTIONAL FEATURES.
9 THE PETITION SHALL INCLUDE DESCRIPTIONS OF THE
10 DESIGN FEATURES OF PROPOSED DWELLINGS TO
11 DEMONSTRATE THEIR APPROPRIATENESS FOR THE
12 AGE-RESTRICTED POPULATIONS. THE MATERIALS
13 SUBMITTED SHALL INDICATE HOW UNIVERSAL DESIGN
14 FEATURES WILL BE USED TO MAKE INDIVIDUAL
15 DWELLINGS ADAPTABLE TO PERSONS WITH MOBILITY
16 OR FUNCTIONAL LIMITATIONS AND HOW THE DESIGN
17 WILL PROVIDE ACCESSIBLE ROUTES BETWEEN
18 DRIVEWAYS, SIDEWALKS, COMMON AREAS AND
19 DWELLING UNITS
- 20 d. THE DEVELOPMENT HAS FRONTAGE ON AND DIRECT
21 ACCESS TO A PUBLIC ROAD.
- 22 e. THE MINIMUM LOT SIZE IS EIGHT GROSS ACRES.
- 23 4) THE DEVELOPMENT SHALL COMPLY WITH THE FOLLOWING
24 BULK REQUIREMENTS:
- 25 a. MAXIMUM HEIGHT:
- 26 i. PRINCIPAL STRUCTURES50 FEET
27 ii. ACCESSORY STRUCTURES15 FEET
- 28 b. MINIMUM STRUCTURE AND USE SETBACK FROM
29 PERIMETER OF DEVELOPMENT:
- 30 i. FROM PUBLIC STREET RIGHT-OF-WAY40 FEET
31 ii. FROM RC, RR, R-ED, PGCC, R-20 OR R-SC
32 DISTRICTS, THE SETBACK APPLICABLE IN THE
33 UNDERLYING ZONING DISTRICT
34 iii. FROM ZONING DISTRICTS OTHER THAN RC, RR, R-
35 ED, PGCC, R-20 OR RSC.....20 FEET
- 36 c. MINIMUM STRUCTURE SETBACK FROM INTERIOR
37 ROADWAY OR DRIVEWAY FOR UNITS WITH
38 GARAGES....20 FEET
- 39 d. MINIMUM STRUCTURE SETBACK FROM LOT LINES:
- 40 i. SIDE10 FEET
41 EXCEPT ZERO LOT LINE DWELLINGS0 FEET
42 A MINIMUM OF 10 FEET MUST BE PROVIDED
43 BETWEEN STRUCTURES
44 ii. REAR10 FEET
- 45 e. MINIMUM DISTANCE BETWEEN PRINCIPAL
46 STRUCTURES10 FEET

- 1 5) AT LEAST 35% OF THE GROSS SITE AREA SHALL BE OPEN
2 SPACE OR OPEN AREA IN ACCORDANCE WITH THE
3 SUBDIVISION AND LAND DEVELOPMENT REGULATIONS. THE
4 OPEN SPACE OR OPEN AREA SHALL PROVIDE AMENITIES
5 SUCH AS PATHWAYS, SEATING AREAS AND OUTDOOR
6 RECREATION AREAS FOR THE RESIDENTS, AND SHALL BE
7 PROTECTIVE OF NATURAL FEATURES.
- 8 6) ACCESSORY USES MAY INCLUDE SOCIAL, RECREATIONAL,
9 EDUCATIONAL, HOUSEKEEPING, SECURITY,
10 TRANSPORTATION OR PERSONAL SERVICES, PROVIDED THAT
11 THE USE OF THESE SERVICES IS LIMITED TO ON-SITE
12 RESIDENTS AND THEIR GUESTS
- 13 7) AT LEAST 15% OF THE DWELLING UNITS SHALL BE
14 MODERATE INCOME HOUSING UNITS.
- 15 8) AT LEAST ONE ON-SITE COMMUNITY BUILDING OR INTERIOR
16 COMMUNITY SPACE SHALL BE PROVIDED THAT CONTAINS A
17 MINIMUM OF:
 - 18 a. 20 SQUARE FEET OF FLOOR AREA PER DWELLING UNIT,
19 FOR THE FIRST 99 UNITS WITH A MINIMUM AREA OF 500
20 SQUARE FEET, AND
 - 21 b. 10 SQUARE FEET OF FLOOR AREA PER DWELLING UNIT
22 FOR EACH ADDITIONAL UNIT ABOVE 99.
- 23 9) THE CONDITIONAL USE PLAN AND THE ARCHITECTURAL
24 DESIGN OF THE BUILDING(S) SHALL HAVE BEEN REVIEWED
25 BY THE DESIGN ADVISORY PANEL, IN ACCORDANCE WITH
26 TITLE 16, SUBTITLE 15 OF THE HOWARD COUNTY CODE, PRIOR
27 TO THE SUBMISSION OF THE CONDITIONAL USE PETITION TO
28 THE DEPARTMENT OF PLANNING AND ZONING. THE
29 PETITIONER SHALL PROVIDE DOCUMENTATION WITH THE
30 PETITION TO SHOW COMPLIANCE WITH THIS CRITERION.