



HOWARD COUNTY DEPARTMENT OF PLANNING AND ZONING

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TECHNICAL STAFF REPORT

Planning Board Meeting of November 20, 2025

Case No./Petitioner: ZRA-214 – Woo Yong Jung (Yale Presbyterian Church, Inc.)

Request: To amend Section 131.0.N.1, Conditional Use for Age-Restricted Adult Housing, by creating a new commercial transition subcategory to allow Age-Restricted Adult Housing apartments within the R-ED, PGCC, R-20, R-12, R-SC, R-SA-8 and R-H-ED districts, provided that the property adjoins a B-1 zoned parcel and is within 1,000 feet of an intersection of two collector roads. This new subcategory would allow up to 20 units per acre and have a 15% MIHU requirement.

I. BACKGROUND AND HISTORY OF EXISTING ZONING REGULATIONS

In 1988, Zoning Board case ZB-849R added “Housing for elderly and/or handicapped persons” to the Zoning Regulations as a special exception in seven residential districts: R, R-ED, R-20, R-12, R-SC, R-SA-8 and R-A-15. This use was created to incentivize development of housing for the elderly and/or handicapped persons through an increase in density above the base zone. The use allowed all dwelling unit types and was restricted to persons 60 years of age and older, or handicapped persons under the age of 60. The maximum allowed density was permitted to exceed the base zoning based on the assumption that this housing type would have less impact on public services such as schools and traffic due to the population’s age and smaller household size. The special exception allowed “housing for elderly and/or handicapped persons” to exceed the base zoning in R-ED and R-20 districts (2 dwelling units per acre) by 250% or 2.5 times (5 dwelling units per acre).

In 1993, the “Housing for elderly and/or handicapped persons” Special Exception was revised to require that “safe public road access” and “transportation to medical services, shopping areas, recreational and other community services” be available if not provided on-site. These requirements recognized the need for seniors to have access to goods and services via safe roads and through public transit service.

In 2001, ZRA-30 created and replaced the “Housing for elderly and/or handicapped persons” Special Exception category with the “Age-Restricted Adult Housing (ARAH)” Conditional Use category. The definition of Age-Restricted Adult Housing reduced the minimum age requirement from 60 to 55 and allowed persons less than 55 to live in the dwelling unit in certain situations.

In 2003, ZRA-42 amended Section 131.0.N.1 to change the minimum structure and use setbacks from the perimeter of the development as follows: (1) From the (then) current 30 feet to 40 feet for setbacks from an external right-of-way other than from an arterial or collector public street right-

of-way and (2) From the (then) current 75 feet for apartments, and from the (then) current 50 feet for setbacks for other uses from RC, RR, R-ED, R-20 or R-SC Districts to 40 feet if adjoining a parcel developed with multi-family or non-residential uses.

In 2005, Council Bill 2-2005 (implemented a portion of the 2003 Comprehensive Rezoning Plan) clarified provisions for Community Center minimum sizes, permitted Multi-plex units in the RC and RR districts, and limited projects with less than 50 dwelling units in the R-ED, R-20 and R-12 districts to detached, semi-detached, multi-plex and single family attached units only.

In 2019, ZRA-187 amended Section 131.0.N.1 to require Age-Restricted Adult Housing Conditional Uses with densities that exceed the base zoning district to have frontage on and direct access to a collector or arterial road.

In 2022, ZRA-200 amended Section 131.0.N.1 to allow Age-Restricted Adult Housing in the B-1 (Business: Local) Zoning District as a Conditional Use (Section 131.0), under certain conditions.

II. DESCRIPTION OF PROPOSAL

This section contains a summary of the Petitioner's proposed amendment. The Petitioner's proposed amendment text is attached as Exhibit A.

The Petitioner states that the intent of the proposed amendment is to allow ARAH on properties adjacent to existing commercial uses. The amendment will allow for more housing opportunities for the County's senior population and eliminate blight/adverse impacts associated with dilapidated commercial properties.

Sec. 131.0.N.1.

The section contains the requirements for the ARAH Conditional Use. It contains three (3) subsections. Subsection "a" pertains to General Age-Restricted Adult Housing, subsection "b" pertains to certain Multi-Plex Age-Restricted Adult Housing and subsection "c" pertains to certain Age-Restricted Adult Housing within B-1 zoned parcels.

The petitioner proposes adding a new subsection "d" to allow ARAH Apartments in the R-ED, PGCC, R-20, R-12, R-SC, R-SA-8 and R-H-ED zoning district, subject to the following criteria:

- 1) The subject property adjoins a B-1 zoning district and is within 1,000 feet of the intersection of two collector roads.
- 2) The development has frontage on and direct access to a public road
- 3) The minimum lot size is eight (8) gross acres
- 4) Site design and landscaping must provide a transition from adjoining commercial development and surrounding residential.
- 5) No more than 20 units permitted per gross acre.
- 6) The apartment units are limited to age-restricted adult housing
- 7) The dwellings will incorporate universal design features
- 8) At least 35% of the gross area shall be open space
- 9) At least 15% of the dwelling units shall be MIHU

- 10) Include a community building or designated community space
- 11) 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.
- 12) 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

III. EVALUATION OF PROPOSAL

This section contains the Department of Planning and Zoning (DPZ) technical evaluation of ZRA-214 in accordance with Section 16.208.(d) of the Howard County Code.

1. The compatibility, including potential adverse impacts and consequences, of the proposed Zoning Regulation Amendment with the existing and potential uses of the surrounding areas and within the same zoning district.

This amendment allows ARAH on properties that are adjacent to commercial areas. Therefore, it is unlikely to result in adverse impacts, since the adjacent uses are similar or more intense.

2. The properties to which the Zoning Regulation Amendment could apply and, if feasible, a map of the impacted properties.

The Petitioner has an interest in 4852 & 4862 Montgomery Road, depicted by the map shown in Attachment A. However, this ZRA will apply to the R-ED, PGCC, R-20, R-12, R-SC, R-SA-8 and R-H-ED districts, provided that the Property adjoins a B-1 zoned parcel and is within 1,000 feet of an intersection of two collector roads. The proposed Zoning Regulation Amendment could potentially impact at approximately 57 properties, depicted by the map shown in Attachment B.

3. Conflicts in the Howard County Zoning Regulations as a result of the Zoning Regulation Amendment.

The current ARAH general conditional use subcategory (Section 131.0.N.1.a) allows ARAH apartments, except in developments with less than 50 dwelling units. The density calculation uses *gross acres* for the proposed use rather than other ARAH categories which use *net acres* for calculating density. There is no stated minimum distance between apartment buildings as mentioned in other ARAH categories. There is no maximum length of buildings such as the typical 120 feet as mentioned in other ARAH categories. The chart depicted in Attachment C gives a comparison of the criteria found in the General Age-Restricted Adult Housing subcategory and the proposed new Age-Restricted Adult Housing subcategory.

4. 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 supports the expansion of housing options for older adults through several relevant policies and implementing actions.

DN-12 Policy Statement:

- Provide a range of affordable, accessible, and adaptable housing options for older adults and persons with disabilities.
 - Implementing Actions:
 1. 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.
 2. Encourage Age-Restricted Adult Housing 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.

The proposed ZRA directly supports these objectives by enabling higher-density ARAH apartments in residential zones adjacent to commercial districts, thereby increasing housing options for seniors who may prefer or require rental housing. The amendment also introduces a MIHU requirement, further advancing affordability goals.

DN-13 Policy Statement:

- Create greater opportunities for multi-generational neighborhoods, especially in character areas identified as activity centers.
 - Implementing Actions:
 1. Design new activity centers to accommodate the needs of various ages, abilities, and life stages. Ensure design of neighborhoods and their amenities provide accessibility using universal design guidelines with sidewalks, wayfinding, and safe connections.

HoCo By Design policies speak to creating greater opportunities for multi-generational neighborhoods, especially in activity centers. Although the impacted zoning districts are not necessarily within future activity centers, elements of multigenerational neighborhoods and universal design principles are important to consider in ARAH developments. Multi-generational neighborhoods “that offer a safe system of sidewalk connections to nearby convenience retail and services can help older adults with mobility issues maintain their independence longer while allowing all families to maintain healthy lifestyles.” (DN-61) As the proposed ZRA requires new commercial residential development, these developments will contribute to creating more multigenerational neighborhoods. Additionally, the proposed ZRA requires developments to incorporate universal design features from the Department of Planning and Zoning Guidelines.

Quality By Design Policy QBD-4 emphasize compatibility and orderly transitions between new development and existing neighborhoods.

QBD-4 Policy Statement:

- Develop context-sensitive design standards appropriate for various scales of infill development to effectively transition between larger developments and established uses.

- Implementing Actions:

4. Assess existing land use and zoning policies for opportunities to incorporate best practice placemaking and urban design principles that create transitions between land uses and between the built and natural environments.

The proposed Conditional Use is limited to properties adjoining B-1 zones and near arterial intersections, which are already characterized by higher development intensity. This locational specificity supports orderly transitions between commercial and residential uses and aligns with the plan's emphasis on context-sensitive infill.

Conclusion

The proposed ZRA is supported by policies in HoCo By Design. It advances stated goals for expanding housing options for older adults, increasing housing affordability through MIHU requirements, promoting walkable, age-friendly communities through the requirement of pedestrian connections to adjacent commercial and residential areas and context sensitive transitions (including architecture and landscape buffering elements) between infill and development and established uses.

Environmental Policies and Objectives

The proposed ZRA-214 is not in conflict with the environmental policies and objectives in HoCo By Design, the County's General Plan. The proposed ZRA-214 would not change any development requirements for sensitive resource protection, stormwater management or forest conservation.

DocuSigned by:

Lynda Eisenberg

11/4/2025

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Lynda D. Eisenberg, AICP, Director

Date

Exhibit A

Petitioner's Proposed Text

(CAPITALS indicate text to be added; text in [[brackets]] indicates text to be deleted.)

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

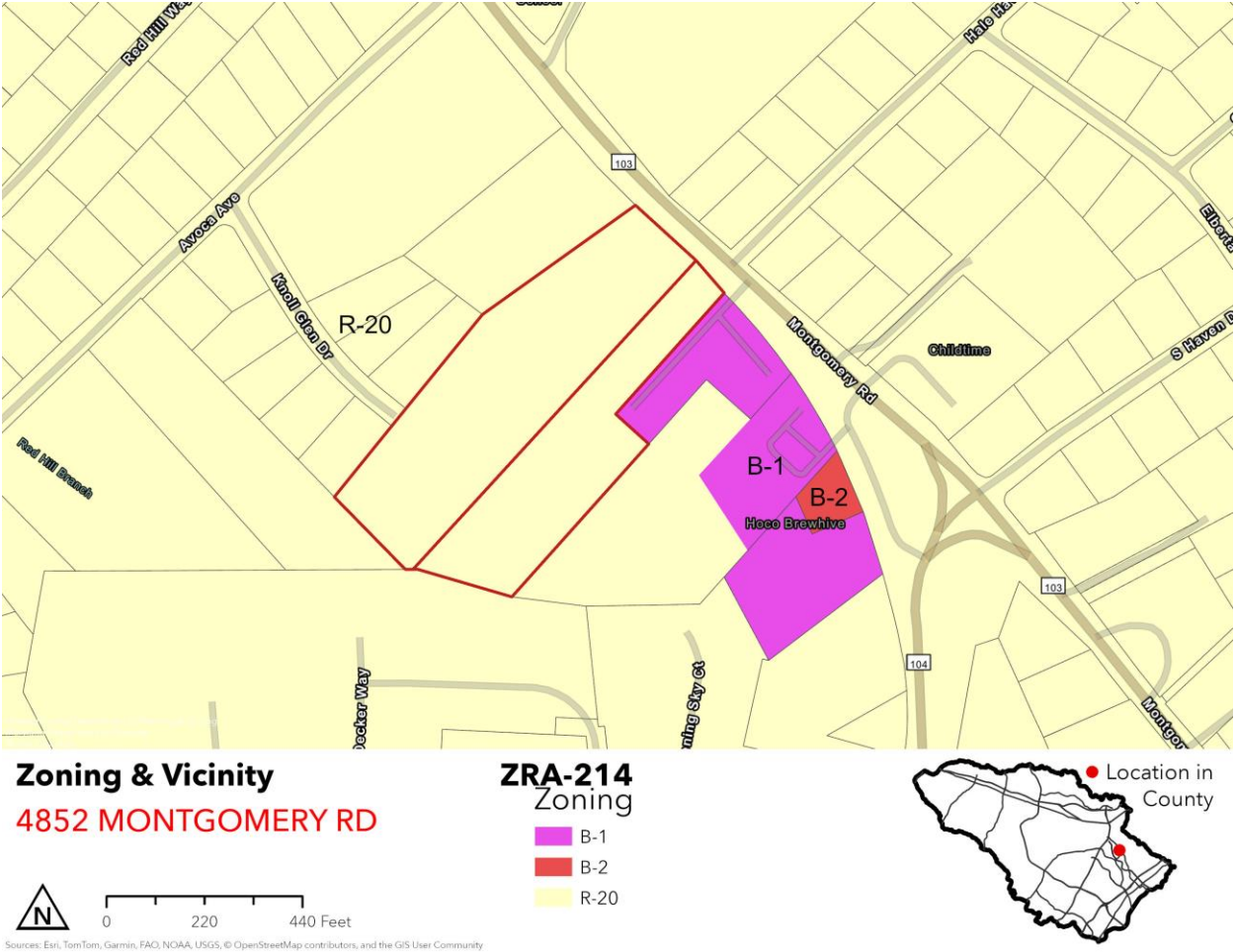
A CONDITIONAL USE MAY BE GRANTED IN THE R-ED, PGCC, R-20, R-12, R-SC, R-SA-8, AND R-HE-D FOR AGE-RESTRICTED ADULT APARTMENTS, PROVIDED THAT:

- 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 COVENANTS THAT ESTABLISH HOW THE AGE RESTRICTIONS REQUIRED UNDER THE DEFINITION OF AGE-RESTRICTED ADULT HOUSING WILL BE IMPLEMENTED AND

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

- 1 7) AT LEAST 15% OF THE DWELLING UNITS SHALL BE MODERATE INCOME
- 2 HOUSING UNITS.
- 3 8) AT LEAST ONE ON-SITE COMMUNITY BUILDING OR INTERIOR COMMUNITY
- 4 SPACE SHALL BE PROVIDED THAT CONTAINS A MINIMUM OF:
- 5 a. 20 SQUARE FEET OF FLOOR AREA PER DWELLING UNIT, FOR THE
- 6 FIRST 99 UNITS WITH A MINIMUM AREA OF 500 SQUARE FEET, AND
- 7 b. 10 SQUARE FEET OF FLOOR AREA PER DWELLING UNIT FOR EACH
- 8 ADDITIONAL UNIT ABOVE 99.
- 9 9) THE CONDITIONAL USE PLAN AND THE ARCHITECTURAL DESIGN OF THE
- 10 BUILDING(S) SHALL HAVE BEEN REVIEWED BY THE DESIGN ADVISORY
- 11 PANEL, IN ACCORDANCE WITH TITLE 16, SUBTITLE 15 OF THE HOWARD
- 12 COUNTY CODE, PRIOR TO THE SUBMISSION OF THE CONDITIONAL USE
- 13 PETITION TO THE DEPARTMENT OF PLANNING AND ZONING. THE
- 14 PETITIONER SHALL PROVIDE DOCUMENTATION WITH THE PETITION TO
- 15 SHOW COMPLIANCE WITH THIS CRITERION.

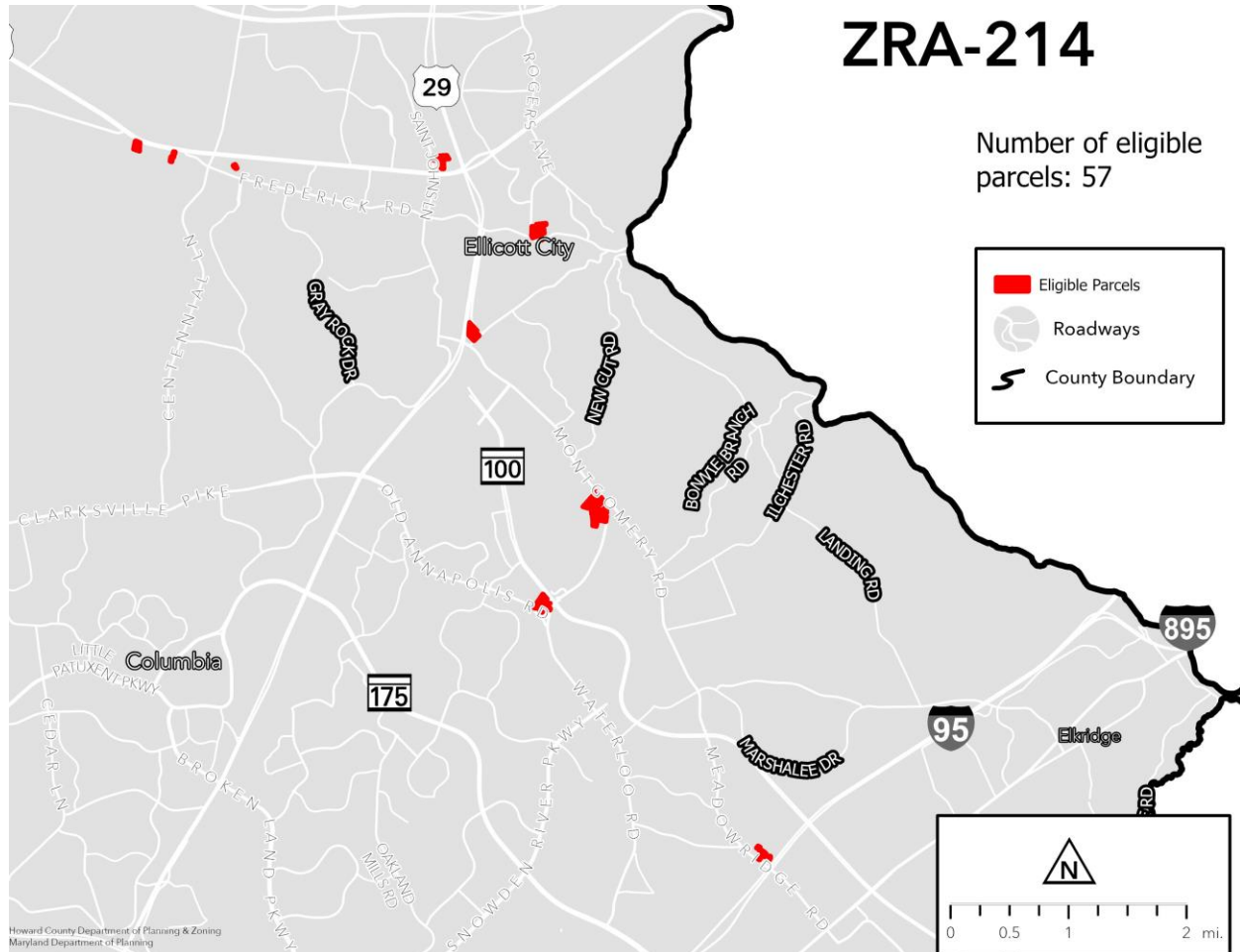
Attachment A



Attachment B

ZRA-214

Number of eligible parcels: 57



Attachment C

Category	Age-Restricted Adult Housing — General	Age-Restricted Adult Housing Apartments — Commercial Transition
Zoning Districts	RC, RR, R-ED, PGCC, R-20, R-12, R-SC, R-SA-8, R-H-ED, R-A-15, R-APT.	R-ED, PGCC, R-20, R-12, R-SC, R-SA-8, R-HE-D.
Minimum Number of Units	Minimum of 20 dwelling units in RC, RR, R-ED, PGCC, R-20, R-12, R-SC, R-SA-8, R-H-ED, R-A-15, or R-APT.	Not specified.
Housing Types Allowed	Detached, semi-detached, multi-plex, attached, and apartment units. For developments <50 units in RC, RR, R-ED, R-20, R-12: apartments not permitted In RC and RR: only detached and semi-detached permitted.	Apartments only.
Density Limit (units/acre)	By district and project size (net acre): <ul style="list-style-type: none"> • RC/RR: 1 • R-ED/PGCC/R-20: 4 (20–49 units), 5 (50+) • R-12: 5 (20–49 units), 6 (50+ units) • R-SC: 7 (20–49 units), 8 (50+ units) • R-SA-8: 12 • R-H-ED: 10 • R-A-15: 25 R-APT: 35 	Max 20 units per gross acre.
Location /Access	If increased density, beyond base density, and as shown above, the site must have frontage on and direct access to a collector or arterial road.	Subject property must adjoin a B-1 zoning district and be within 1,000 feet of the intersection of two collector roads; development must have frontage on and direct access to a public road.
Compatibility	Landscape character must blend with adjacent residential. Grading/landscaping shall retain/enhance elements that allow blending.	Same requirement.
Transition Method	Provide either: (i) architectural transition (buildings near perimeter similar in scale/materials/details) or (ii) additional buffering (retained forest/enhanced landscaping/berms/increased setbacks).	Same requirement.
Pedestrian Connectivity	Not expressly required, though blending/compatibility standards apply.	Petitioner shall provide pedestrian connectivity between the apartments, adjoining commercial, and surrounding residential development.
Setback for Small Projects	For projects <50 units in RC, RR, R-ED, PGCC, R-20, R-12: street setbacks must match the adjacent residential setbacks.	Not specified.
Maximum Height	Apartments: 40 ft (except 55 ft in R-SA-8, R-A-15, R-APT). Other principal structures: 34 ft.	Principal structures: 50 ft. Accessory structures: 15 ft.

	Accessory: 15 ft.	
Perimeter Setbacks	Minimum 40 ft from public street right-of-way.	Same requirement.
Perimeter Setbacks	From residential lots in RC, RR, R-ED, PGCC, R-20, R-12, R-SC: <ul style="list-style-type: none"> • Apartments 100 ft • Single-family attached 75 ft • Single-family detached/semi-detached/multi-plex 40 ft. From open space, multi-family, or non-residential in RC, RR, R-ED, PGCC, R-20, R-12, R-SC: 30 ft. From other zoning districts: 20 ft. In B-1: structures 30 ft; parking/use 10 ft.	From RC, RR, R-ED, PGCC, R-20 or R-SC: the setback applicable in the underlying district applies. From other zoning districts: 20 ft.
Interior Roadway/Drive way Setback	20 ft.	20 ft.
Lot Line Setbacks	Side: 10 ft (0 ft for zero-lot-line dwellings) with a minimum 10 ft between structures Rear: 20 ft.	Side: 10 ft (0 ft for zero-lot-line dwellings) with a minimum 10 ft between structures Rear: 10 ft.
Minimum Distance Between Single-Family Dwellings	Face-to-face 30 ft Side-to-side 15 ft Face-to-side or rear-to-side 20 ft Rear-to-rear 40 ft Face-to-rear 100 ft.	Not specified
Minimum Distance: Apartment-to-Apartment / Apartment-to-Single-Family	Face-to-face 30 ft Side-to-side 15 ft Face-to-side or rear-to-side 30 ft Rear-to-rear 60 ft Face-to-rear 100 ft.	Minimum distance between principal structures: 10 ft.
Max Building Length	Apartment buildings and SFA groups may not exceed 120 ft; HA may approve up to 300 ft (R-SA-8, R-A-15, R-APT) or 200 ft (other districts) with mitigating design.	Not specified.
Minimum Lot Size	Not specified as a fixed minimum; governed via density and unit minimums.	8 gross acres.
Open Space Requirement	RC/RR/R-ED/PGCC: ≥50% of gross site R-20/R-12/R-SC: ≥35% R-SA-8/R-H-ED/R-A-15/R-APT: ≥25% Must provide amenities (pathways, seating, recreation) and protect natural features.	≥35% of gross site area Must provide amenities (pathways, seating, outdoor recreation) and protect natural features.
Accessory Uses (on-site residents/guests only)	Social, recreational, educational, housekeeping, security, transportation, personal services.	Same requirement.
Community Building / Interior Community Space	≥20 sq ft per dwelling unit for first 99 (min 500 sq ft) ≥10 sq ft per unit thereafter.	Same requirement.

Moderate Income Housing Units (MIHU)	At least 10% in RC, RR, R-ED, R-20, R-12, R-SC At least 15% in PGCC, R-SA-8, R-H-ED, R-A-15, R-APT.	At least 15% of dwelling units.
Age Restriction Enforcement	Petition must establish how age restrictions will be implemented/maintained; if not rental under single ownership, HOA/condo must enforce	Same requirement.
Universal Design	Incorporate DPZ Universal Design guidelines (required/recommended/optional). Demonstrate appropriateness for age-restricted population. Provide accessible routes between parking areas, sidewalks, dwelling units, and common areas.	Same requirement.
Loading/Trash Screening	Loading and trash storage areas must be adequately screened from view.	Not specified.
Phased Development	For phased projects, open space and accessory facilities must be provided each phase; provide schedule at approval.	Not specified.
Common Area Ownership/Main tenance	All open space, common areas, and improvements must be managed/maintained by a common entity (owner, condo association, HOA).	Not specified.
Grandfathering Provision	Pre-July 12, 2001, housing for the elderly special exceptions may convert to age-restricted adult housing with new covenants, without further HA review.	Not specified.
Design Advisory Panel (DAP) Review	DAP review required prior to submission of the Conditional Use petition.	Same requirement.