ZONING PRACTICE JUNE 2016

AMERICAN PLANNING ASSOCIATION

ISSUE NUMBER 6

PRACTICE GROUP HOUSING

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Become a Group Home Guru

By Dwight H. Merriam, FAICP

Group homes are *sui generis*, truly a class unto themselves in terms of planning and regulation.

They present nearly intractable challenges for planners, regulators, neighbors, advocates, developers, and many other stakeholders, chief among them the residents. Largely because of misperceptions by many people and a lack of understanding, group homes are among the most disfavored land uses. One study in 1998 found that people felt that group homes were wanted even less in their communities than industrial uses, landfills, and waste disposal sites (Takahashi and Gaber).

One of the problems exacerbating the resistance to the orderly siting of group homes is the lack of proper planning and regulation. This brief treatment of the issues is a basic primer in planning and regulating group homes.

Unquestionably, and facilitated by good planning and regulation, the appropriate siting of group homes will help a community become a richer and more diverse place, and facilitate the ends of social justice. Social justice is the watchword here. People with disabilities, particularly those with developmental disabilities and suffering from mental health issues, have been treated despicably and only in recent times have come, in large measure though not universally, to be protected and respected.

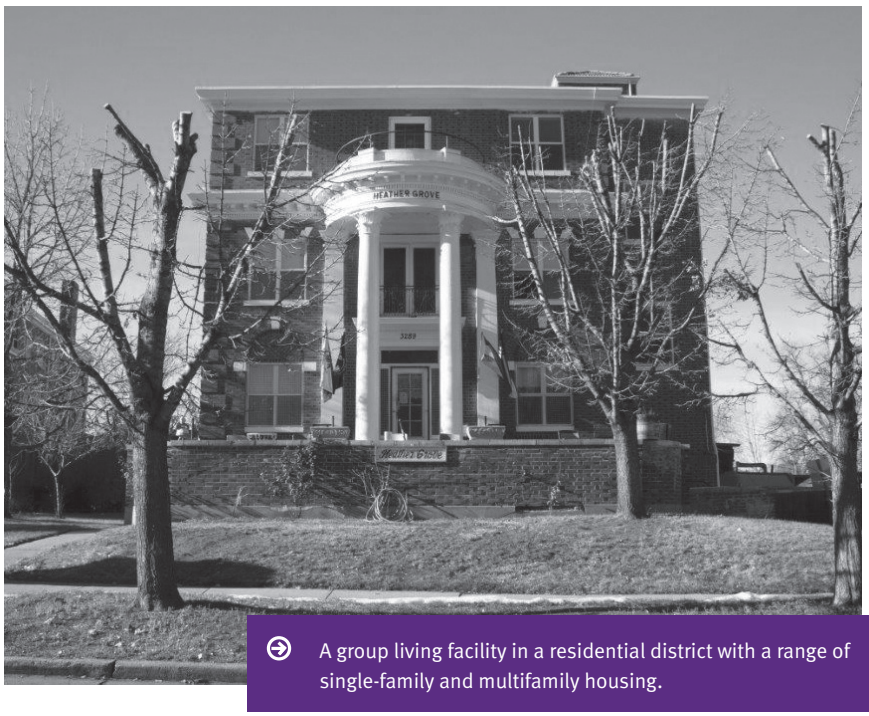
Historically, those most fortunate were cared for at home (Hogan 1987). When government fails to provide adequate housing for people with disabilities, they are usually rendered homeless and left on the streets, where they are often victims of crime and prone to drug addiction (Apfel 1995). That homelessness among those with disabilities is a continuing problem is evidence that adequate housing is still not always available.

'GROUP HOME' DEFINED

The term "group home" generally refers to any congregate housing arrangement for a group of unrelated people. Typically the residents share a condition, characteristic, or status not typical of the general population. These congregate living arrangements include community residential facilities, group living facilities, community care homes, nursing homes, assisted living facilities, and many others. They may be permanent or transitional, for-profit or nonprofit, professionally managed or self-managed.

How a group home is defined ultimately delimits the reach of planning and regulation, and guides public policy making. The U.S. Department of Justice has defined the term (2015). Many state and local governments have their own definitions as well. It is worthwhile to consider the broadest range of definitions from many sources and pare that down to those types of living arrangements needing local attention.

But before we go further, consider how local planning and regulation is sometimes inextricably linked with federal laws requiring that local regulations conform to federal mandates.



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A group living facility in a residential district with a range of single-family and multifamily housing.

FEDERAL ZONING

Of course, the U.S. government does not zone land, but there are many federal laws that have such an impact on local land-use regulations that we might call those laws "ersatz federal zoning." The National Flood Insurance Program is one example. It requires that local governments prohibit certain activities in floodways and floodplains. To preserve the right of property owners to get federal flood insurance, local governments must plan and regulate consistently with the national program.

The Religious Land Use and Institutionalized Persons Act (RLUIPA) gives religious organizations and institutionalized persons the right to seek redress in state or federal court when they believe the government is infringing on their legal rights. RLUIPA can be, and very often is, used to force zoning changes to allow

religious activities involving the use of land to go forward, overriding local plans and local regulations as necessary.

The Telecommunications Act of 1996 requires that local governments not regulate in a manner that prohibits or has the effect of prohibiting antennas and towers providing personal wireless services. The Act also directs that communities act on applications within a reasonable time and that any denial of an application must be made in writing and supported by substantial evidence. The Act is unusual in that it expressly preempts local regulation under certain circumstances. It does so if the local decision denying an application is based directly or indirectly on the environmental effects of radiofrequency emissions (47 U.S.C. §332(c)(7)).

One of the most direct initiatives from our federal government is the Air Installations Compatible Use Zones (32 CFR §256.5). The program mandates that the secretaries of military departments coordinate with local governments around military air installations "to work toward compatible planning and development in the vicinity of military airfields. . . ."

Federal law similarly influences local planning and regulation for group homes for people with disabilities. That law is the Fair Housing Amendments Act (FHAA), enacted in 1988 to extend the protections of the 1968 Fair Housing Act to people with disabilities. The FHAA prohibits a party from discriminating "in the sale or rental [of], or to otherwise make unavailable or deny, a dwelling to any buyer or renter because of a handicap" (42 U.S.C. §3604(f)(1)). A "handicap" is defined with three alternatives: "'Handicap' means, with respect to a person, (1) a physical or mental impairment which substantially limits one or more of such person's major life activities, (2) a record of having such an impairment, or (3) being regarded as having such an impairment, but such term does not include current, illegal use of or addiction to a controlled substance (as defined in 21 U.S.C. §802)" (42 U.S.C. §3602(h)). This is essentially the same definition of the term as has been incorporated in the Americans with Disabilities Act (42 U.S.C. §12102).

Note that federal law, and many state and local laws, use the now-outmoded term "handicapped." The more accurate, appropriate, and respectful description is to use the phrase "a person with a disability" and not a "handicapped person" or a "disabled person." There is by no means universal agreement on this terminology and grammatical structure. Some argue that the generally preferred phrasing "a person with a disability" suggests a medical, rather than the social model (e.g., see Eagan 2012).

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A facility for persons with cognitive disabilities in Denver.

While the FHAA does not explicitly address group homes, the U.S. Department of Justice makes it clear (in a joint statement with the U.S. Department of Housing and Urban Development) that the FHAA does prohibit local governments from discriminating against residents on the basis of "race, color, national origin, religion, sex, handicap [disability] or familial status [families with minor children]" through land-use regulation (2015). The upshot is that group homes occupied by unrelated individuals with disabilities have special protection from exclusionary zoning under the FHAA.

Not included within the reach of the federal law, except to the extent that the residents also are disabled, are group homes that are alternatives to incarceration, temporary housing for workers, halfway houses for ex-offenders, homeless shelters, places of sanctuary and prayer, homes for those who are victims of domestic violence, college dormitories . . . you can readily add to this list. Providing for these other types of group homes is important and can be done at the same time as the community addresses its required compliance with the FHAA, but (now take a deep breath) there is one important and dramatic distinction for those types of group homes falling under the protection of the FHAA.

SHOW ME THE MONEY

That distinction has to do with the endgame of an FHAA action. In a typical zoning appeal, for example when a homeless shelter developer is denied a conditional use permit and appeals and wins, the developer still has to pay for all of its own legal costs. However, consider what happens if the developer of a group home within the reach of the FHAA—one for adults with developmental disabilities, for example—is denied a conditional use permit. If the developer appeals and also brings an action under the FHAA—and wins—that developer is a prevailing party in a fair housing suit, and is allowed, in the court's discretion, reasonable attorney fees (42 U.S.C. §3613(c)).

If the action is brought under the Civil Rights Acts of 1871, a so-called Section 1983 action for a violation of federal constitutional or statutory law, the prevailing party may recover attorney fees under the 1976 Civil Rights Attorney's Fees Act (42 U.S.C. §1988). Unless there are special circumstances, a prevailing plaintiff should be awarded attorney fees, but a prevailing defendant, for example the local planning board, is entitled to attorney fees only if the suit was "frivolous, unreasonable, or groundless, or that the plaintiff continued to litigate after it clearly became so" (*Hensley v. Eckerhart*, 461 U.S. 424 (1983)). The attorney fees provision, enacted to encourage lawyers to take on these cases, brings a heavy thumb down on the scales of justice.

How bad can that be? Last year, Newport Beach, California, settled some long-running litigation against the city brought by providers of group homes who claimed the city violated the FHAA in effectively prohibiting group homes with seven or more residents in most of the residential areas, as well as requiring that existing group homes go through the same permit process as is required for new homes, including a public review process (Fry 2015). The city of Newport Beach spent more than $4 million of its own money defending its position

A small drug and alcohol recovery facility in a low-density residential setting.

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and agreed to pay the group homes $5.25 million. In short and in sum, the fight cost the city $10 million. Even at the cost of building a new, high-end group home specially adapted for people for physical disabilities, this $10 million "wasted" in the litigation could have provided more than 80 new beds in Newport Beach, based roughly on the $600,000 recently spent elsewhere to build a five-bed facility (Salasky 2012).

THE 'SEVEN-NUN CONUNDRUM'

To illustrate the dramatic effect of the FHAA, consider this real controversy. It is guaranteed to make you smile, shake your head in wonderment, and provide you with a conversation starter with other people who share your interest in planning and zoning.

We need to start with the typical zoning definition of "family." Nearly every local government defines "family" consistent in most respects with the definition upheld by the U. S. Supreme Court in 1974:

> With this definition an unlimited number of people can live together so long as they are related by blood, adoption, or marriage, or in the alternative, no more than two unrelated people can live together. Some local regulations allow an unlimited number of related persons to live together and along with them some limited number, say two or three, unrelated persons.

Is your definition similar? Almost certainly it is. Remember, however, that we actually have 51 constitutions in this country, one federal and 50 state, and what may be constitutional under federal law may not be constitutional under state law. A half-dozen or so states interpreting their state constitutions have ruled this kind of definition of family unconstitutional under their state constitutions, holding that the definition is not reasonably related to promoting the public's health, safety, and general welfare.

Obviously a typical group home of six or eight or more unrelated individuals, with or without one or two resident managers, cannot be located in the residential districts of nearly all of the municipalities in this country, unless those local governments happen to have some type of group home zoning.

This brings us to Joliet, Illinois, in the mid-1990s when three nuns, Franciscan Sisters of the Sacred Heart, proposed to live together in a single-family zoning district, bringing in a fourth sister and wanting to have at any time up to three additional guests, women considering becoming members of the order (Merriam and Sitkowski 1998). The regulations allowed only three unrelated people to live together. The nuns sought zoning approval to allow four nuns to live in the home and to convert the basement into the three additional bedrooms for their guests.

More than 100 home owners signed a petition against the application, claiming that the convent would damage the single-family character of the neighborhood, depress property values, and result in increased taxes when the home was removed from the tax rolls. One neighbor said: "We have no objection to three nuns living there but we do object to four or more. If this variation is allowed to go through, the city council, in effect, will be allowing a mini-hotel to be established in our neighborhood. The nuns will come and go, novices will come and go, visitors will come and go. The result will be that our property values would decrease" (Ziemba 1998).

The city council did vote to give the zoning approval, and the mayor, who lived nearby, noted that a family of seven—a couple with five children—could move into the same house without any zoning approval: "It would be legal, even though the impact would be more intense" (Ziemba 1998). Now, here is the punchline and the question you ask your planner friends at the next social event after you have described this background: Under what condition could these seven nuns live together in virtually any single-family dwelling unit in any neighborhood in any city, town, or county anywhere all across this great country regardless of the local definition family and regardless of the federal constitutional right of local government to restrict the definition of family?

Answer: These seven nuns could live together as a household unit as a matter of federal law, the FHAA to be specific, if they were recovering alcoholics or substance abusers, or otherwise disabled. The "Seven-Nun Conundrum" teaches us two things: the traditional definition of family needs to be reconsidered, as it is a complete bar to group homes, and local governments need to get out ahead of the group homes issue by affirmatively planning and regulating for them so that they are sited in the best locations and no one will ever have reason to go to court and claim that they are excluded from living in the community.

IT ALL STARTS WITH PLANNING

Planning for and regulating group homes

requires some careful thought about the community's needs and the demand for such uses. Regardless of the special attention the attorney fees provisions may demand, it is best to plan for all types of group living arrangements at the same time and under the same terms, except as is necessary to recognize that there are differences between them. It should not be the threat of the FHAA that drives a local government to plan and regulate for just those types of group living arrangements that are within the reach of the federal law.

The first step is to identify all types of group living arrangements that are needed now and in the future in your community. Survey social service agencies locally and regionally; interview state-level departments with responsibilities for those who might live in such homes. The agencies will have a list of existing group homes. Some of the homes will likely predate local regulation or may have become established by variances. It is useful to understand what is in place now in order to be able to determine current and future needs.

The operators serving the residents of area group homes can provide insight into gaps in coverage and challenges, particularly opposition, that may lie ahead. As you get further the planning process, you will likely find that access to public transportation is important for many types of facilities. Also, it is important to note that in some states, group homes operated by, contracting with, or funded by a state agency may be immune from local zoning ordinances (Kelly 2016).

The U.S. Census Bureau collects data on the disability status of respondents to the American Community Survey (ACS), and that data is helpful in developing a needs-driven comprehensive planning element. The census data categorizes disabilities as visual, hearing, ambulatory, cognitive, health care, and independent living. The data is also disaggregated by gender, age, race, education level, employment, and health insurance coverage. The ACS also has data on "Group Quarters" generally, of all types (2016).

What is often lacking in the available data and in the surveys conducted is the ability of families to care for those who are disabled and who may be prospective residents of a group home. There are many advocacy groups for people with all types of disabilities that may prove helpful in identifying the hidden demand—families who are caring for their own, often struggling and anxious about the future care of their family members. Among these organizations are the American Association of People with Disabilities, the National Disabilities Rights Network, the National Information Center for Children and Youth with Disabilities, the National Organization on Disability, and the National Supportive Housing Network.

After the need for various types of group homes, the number of beds for each, and the time frame within which they must be developed, the planning process involves identifying appropriate locations and reaching out to the neighborhoods to attempt to mitigate community opposition through meetings and workshops.

One essential decision is whether to concentrate group homes in one area, particularly where they have access to services, or to disperse them throughout the community to avoid clustering and to facilitate mainstreaming the residents. The courts are not settled on which is the preferred approach. Spacing requirements establishing minimum separating distances between group homes have met with mixed results in the courts. Ultimately, a hybrid approach may be best, locating group homes in a somewhat more clustered way with ready access to services and transportation, while the same time dispersing group homes throughout moderately low-density residential neighborhoods so that they blend seamlessly with the rest of the population.

THE REGULATIONS

Good regulations start with good definitions. Spend plenty of time talking about the types of group homes and how you will define them. See the many types listed in the ACS. You must define "family" and "disability." And to reiterate, providing for group housing is not just about persons with disabilities. There remains a critical need to accommodate all manner of group living arrangements, most of which have no protection under federal law, although they may under state law. For example, local regulations may address the many other types of group homes noted at the outset, chief among them shelters for victims of domestic violence, homes for juveniles, halfway houses for those released from incarceration or as alternatives to incarnation, homeless shelters, congregate housing, job corps shelters, workers' group living quarters (pejoratively labeled "man camps" by some), religious homes such as convent and clergy houses, retirement homes, and even fraternity and sorority houses.

They are all deserving of careful review and attention to whether current and future needs are being met, where such uses might be best located, how many beds are needed during the planning period, what design and siting considerations may be established in advance as criteria for approval, and what processes might be followed—all of which may vary from one type of group living arrangement to another.

Regulation may range from highly discretionary to as-of-right. The most discretionary would be to use a "floating zone" for group homes, where approval requires rezoning the subject parcel. That application typically includes a conceptual site plan so the regulators know what they will get if they vote to allow the floating zone to descend and apply. It is the best of both worlds for planners because the local officials are making a legislative decision in rezoning the land. Courts give the greatest deference to legislative decisions, as distinguished from quasi-judicial decisions such as variances, and administrative decisions, which include subdivision and site plan approvals.

At the same time, the locality gets to see what it is going to get by having a conceptual site plan as part of the rezoning application. The applicants for group homes also may prefer this approach because the conceptual site plan is inexpensive to produce, and once they have the zoning they will have a vested right to develop it consistent with the conceptual site plan. At that point they can finance the detailed architectural and engineering work to get to the final site plan approval stage.

At the other end of the continuum is the as-of-right approach, with zoning districts allowing group homes subject only to compliance with the code and issuance of a certificate of zoning compliance and building permits.

In between these end points is the quasi-discretionary conditional use permit, sometimes called a special permit, special use permit, or special exception. In these cases, the group home use is permitted, but an application and public hearing are required to determine if it is appropriate for a particular site.

Take care not to stigmatize the potential residents. Federal appellate courts covering about half of the country have found that a formal, discretionary approval, such a conditional use permit, is not acceptable when used in making a decision regarding persons with disabilities or those otherwise protected under the FHAA, because they stigmatize the resi-

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An assisted living facility outside of Denver.

dents by requiring them to come "hat in hand" for permission to live like any other household. The floating zoning approach has the same problem. At the same time, local officials have a real need to make sure that the group home meets the needs of its residents, fits in with its neighbors, and blends in such that is it is indistinguishable from others. Questions that arise include access to transportation, appearance and scale, parking, and density of occupancy. Locational criteria such as these and others must be assessed either through a public review or by staff.

Which approach to take along the continuum of discretion is a difficult, even intractable, ethical, legal, and public policy decision. Ultimately, it may be politically necessary to have some discretion in the process.

Given that residents may have cognitive or physical disabilities affecting mobility, it is especially essential to give special care to housing, building, and fire codes in the administration of any group homes program. One common issue is determining the "right" number of residents permitted. Some of the federal courts have used a "rule of eight" allowing up to eight essentially as-of-right—but beyond that, supporting greater discretion by the local government. (*Oxford House-C v. City of St. Louis*, 77 F 3d, 249, 253). Smaller group homes tend to be better integrated in single-family detached neighborhoods, while the larger group homes provide economies of scale, the opportunity for a higher level of service, and often peer support that is essential to some populations, such as those in drug and alcohol abuse recovery. Again, a hybrid approach allowing a range of levels of occupancy depending upon the setting may prove to be the most advantageous strategy. For example, a group home in a single-family residence of not more than eight people including caregivers and managers might be as-of-right. Any home with greater occupancy could be required to have some type of formal review, perhaps site plan review at a public meeting, or a conditional use permit, or even a rezoning with a floating zone or overlay district. But it also may depend upon the context. Would it be necessary, for example, to require a public hearing for the conversion of an existing 10-apartment building to a group residence for 40 people recovering from addiction?

ONE REALLY GOOD EXAMPLE

Almost three decades ago, the city of Ames, Iowa, the home of Iowa State University, found itself in a perfect storm of neighborhood invasions by college students, challenges to the traditional definition of family, the need to accommodate a variety of household types, and a state statutory mandate regarding group homes. Somehow, under the leadership of elected and appointed officials, including the then planning director Brian O'Connell, the community developed a comprehensive approach mitigating all of the impacts of the storm. I was along for the ride as a consultant to the city in developing the regulations.

By developing definitions of "family" (§29.201) and "functional family" (§29.1503(4)(d)), Ames was able to prevent groups of undergraduates from taking over single-family houses and at the same time accommodate any seven Franciscan nuns who might choose to live in the city and any other groups of people that were truly functioning as a type of family, including extended gay and lesbian families with unrelated individuals and foster children (long before the right to same-sex marriage).

Group homes ("Group Living"), defined in part as being "larger than the average household size," were addressed consistent with the state statutes, while distinguishing them from "Household Living," considered to be "[r]esidential occupancy of a dwelling by a family," and the definition of family was made less restrictive. The regulations today have evolved in some respects from the initial ones first adopted in the early 1990s, and they are better for it. One especially salutary aspect of this definitional scheme is that a group home for persons with disabilities with eight or fewer residents is considered a "Family Home" as defined in Section 29.201 of the Ordinance and in Iowa Code Section 414.22, and is treated like any single-family use. What is also interesting is how Ames conformed its local regulation with state definitions and requirements.

The regulations are not perfect—no regulations are—and they should not be considered a model for adoption elsewhere without careful consideration. However, the city did a good job of reconciling competing needs and the regulations are worthy of consideration.

THE ULTIMATE ESCAPE HATCH: 'REASONABLE ACCOMMODATION'

If a community does not have good planning and regulations, such that group homes are not readily approved and developed without discrimination, the FHAA requires that local governments provide a "reasonable accommodation" for group homes with disabled persons (42 U.S.C. §604(f)(3)(B)). In the words of a federal appellate court: "reasonable accommodation provision prohibits the enforcement of zoning ordinances and local housing policies in a manner that denies people with disabilities access to housing on par with that of those who are not disabled" (*Hobson's, Inc. v. Township of Brick*, 89 Fed.3d 1096, 1104 (3rd Cir. 1996)). A reasonable accommodation

can be anything, including use or dimensional variances, amending the regulations, issuing a building permit even though it is illegal under the regulations, and allowing a group home to be considered similar enough to some other use permitted under the regulations, such as a bed and breakfast. Being forced to make a reasonable accommodation is a poor substitute for good planning and regulation, but sometimes it may be all you have.

MEET THE NEED, MEET THE LAW

Becoming a group homes guru requires recognizing the need for them, and planning for and regulating them with a fine-grained approach to make sure that they are fully integrated with the rest of the community while protecting the interests of all stakeholders. It is the right thing to do, and it is the law. Community opposition to group homes can often be traced back to lack of information or misinformation, fear of negative community impacts, shortcomings in local procedures that preclude full public participation in the decision-making process, outright prejudice and bias, and conflicting interests and development goals (Iglesias 2002).

The federal Fair Housing Amendments Act, the principal federal law dealing with matters of housing discrimination against people with disabilities, and other federal and state antidiscrimination laws (including the Americans With Disabilities Act, the Rehabilitation Act, and state-law equivalents), require local governments to plan for and enable group homes through reasonable regulation for those expressly protected under the law. In addition, it is the responsibility of all of us to provide safe, clean, decent housing for all citizens, many of whom can only be accommodated in group homes.

ABOUT THE AUTHOR

Dwight H. Merriam, FAICP, founded Robinson & Cole's Land Use Group in 1978, where he represents land owners, developers, governments, and individuals in land-use matters. He is past president of the American Institute of Certified Planners and received his masters of regional planning degree from the University of North Carolina and his Juris Doctor from Yale.

Cover photo: AlexeyVS/Thinkstock

Vol. 33, No. 6

Zoning Practice is a monthly publication of the American Planning Association. Subscriptions are available for $95 (U.S.) and $120 (foreign). James M. Drinan, JD, Executive Director; David Rouse, FAICP, Managing Director of Research and Advisory Services. Zoning Practice (ISSN 1548–0135) is produced at APA. Jim Schwab, FAICP, and David Morley, AICP, Editors; Julie Von Bergen, Senior Editor.

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

REFERENCES

Apfel, Alicia Hancock. 1995. "Cast Adrift: Homeless Mentally Ill, Alcoholic and Drug Addicted." *Catholic University Law Review*, 44: 551–597. Available at tinyurl.com/jurw6xh.

Discriminatory Housing and the Fair Housing Act. 2007. Philadelphia: Disability Rights Network of Pennsylvania. Available at tinyurl.com/j6r7m4e.

Eagan, Lisa. 2012. "I'm Not A 'Person With a Disability': I'm a Disabled Person." *XO Jane*, November 9. Available at tinyurl.com/brl7axh.

Fry, Hannah. 2015. "Newport Will Pay Group Homes $5.25 Million Settlement." *Los Angeles Times*, July 16. Available at tinyurl.com/gqyrpnd.

Hogan, James T. 1987. "Community Housing Rights for the Mentally Retarded." *Detroit College of Law Review*: 869, 873.

Iglesias, Tim. 2002. "Managing Local Opposition to Affordable Housing: A New Approach to NIMBY." *Journal of Affordable Housing*, 12 (1): 78–121. Available at tinyurl.com/zm3vc67.

Kelly, Eric D., ed. 2016. "Section 40.05[3]" In *Zoning and Land Use Controls*. New York: Matthew Bender & Company.

Merriam, Dwight H., and Robert J. Sitkowski. 1999. "The Seven-Nun Conundrum: Seeking Divine Guidance in the Definition of 'Family'." *Land Use Law & Zoning Digest*, 51(6): 3–7.

Salasky, Prue. 2012. "Group Homes for the Intellectually and Developmentally Disabled Are Taking Shape on the Peninsula." *Daily Press*, January 24. Available at tinyurl.com/jl37h3t.

U.S. Census Bureau. 2016. "Frequently Asked Questions: Can you tell me more about group quarters (GQ) or group housing facilities in the American Community Survey (ACS)?" Available at tinyurl.com/zn9dkfy.

U.S. Department of Justice. 2015. "Joint Statement of the Department of Justice and the Department of Housing and Urban Development: Group Homes, Local Land Use, and the Fair Housing Act," updated August 6. Available at tinyurl.com/ztsy8wf.

Takahashi, Lois M., and Sharon Lord Gaber. 1998. "Controversial Facility Siting in the Urban Environment." *Environment & Behavior*, 30(2): 184–215. Available at tinyurl.com/z2e9nan.

Ziemba, Stanley. 1998. "Nuns Get Preliminary Ok to Occupy House in Joliet." *Chicago Tribune*, October 6. Available at tinyurl.com/gw8l5nq.

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AMERICAN PLANNING ASSOCIATION

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

HAS YOUR COMMUNITY MADE SPACE FOR GROUP HOUSING?

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