

City Commission

AGENDA ITEM REPORT



Meeting: City Commission - 03 Aug 2021
Presenter: Tracey Schofield, Community Development
Staff Contact: Tracey Schofield, Community Standards Manager Ext. 7304 tschofie@largo.com

TITLE

Ordinance No. 2021-53 - First Reading - Amending Section 18.2 Of The Comprehensive Development Code To Establish The Community Standards Manager's Duties And Responsibilities Regarding The Property Maintenance Code

SUMMARY:

The proposed amendment to the City's Comprehensive Development Code (CDC), Ordinance No. 2021-53, is to establish the Community Standards Division's duties and responsibilities as they relate to the Property Maintenance Code in CDC Chapter 18.2. In 2017, the Code Enforcement Division was created within the Community Development Department. Prior to that, there was no stand alone division and the Code Officers worked under the Police Chief and then the Building Official. When the new Code Enforcement Division was created, the CDC was not updated to reflect the new Division and its duties and responsibilities to enforce the Property Maintenance Code. As currently written in the CDC, the Building Official is solely responsible for enforcing the Property Maintenance Code. However, historically these types of violations are addressed through code enforcement, not by the Building Inspectors. The Community Standards Division is currently working under an authorization memorandum from the Building Official in an effort to perform their duties.

In order for the City of Largo to properly transfer Property Maintenance enforcement duties and specify shared responsibilities between the Building Official and the Community Standards Manager, the Community Development Department is proposing to amend Section 18.2 to reflect these changes. On June 3, 2021, the Planning Board reviewed and approved these changes to the CDC.

CITY ATTORNEY REVIEWED:

Yes

CONSISTENT WITH:

Future Focus

POTENTIAL MOTION / DIRECTION REQUESTED:

I MOVE TO APPROVE/DISAPPROVE ORDINANCE NO. 2021-53 ON FIRST READING AND SCHEDULE A SECOND READING AND PUBLIC HEARING ON SEPTEMBER 7, 2021.

ATTACHMENTS:

[Ordinance No. 2021-53](#)

ORDINANCE NO. 2021-53

AN ORDINANCE OF THE CITY OF LARGO, FLORIDA AMENDING SECTION 18.2 OF THE CITY OF LARGO COMPREHENSIVE DEVELOPMENT CODE TO ESTABLISH THE COMMUNITY STANDARDS MANAGER'S DUTIES AND RESPONSIBILITIES REGARDING THE PROPERTY MAINTENANCE CODE; PROVIDING FOR SEVERABILITY; AND PROVIDING FOR AN EFFECTIVE DATE.

WHEREAS, the City of Largo City Commission previously adopted the Comprehensive Development Code (CDC), which encompasses the City's land development regulations; and

WHEREAS, the CDC is intended to regulate and protect the health, safety, and welfare of the citizens of Largo, and to implement the City's Comprehensive Plan; and

WHEREAS, the Comprehensive Development Code contains the City's Property Maintenance Code; and

WHEREAS, amendments to the Comprehensive Development Code are necessary to define the Community Standards Manager's authority to administer and enforce the Property Maintenance Code; and

WHEREAS, the City Commission finds that adoption of this ordinance is consistent with its police powers and will protect the public health, safety, and welfare of the residents of the City, and is consistent with, furthers and implements the purposes, goals, policies, and objectives of the City's Comprehensive Plan.

NOW, THEREFORE, THE CITY OF LARGO CITY COMMISSION HEREBY ORDAINS:

SECTION 1. The above recitals are true and correct and are hereby incorporated by reference as the findings of the City Commission.

SECTION 2. That Section 18.2.2.F of the City of Largo Comprehensive Development Code is amended to read as follows:

F. *Historic buildings* - The provisions of the Property Maintenance Code shall not be mandatory for existing buildings or structures that are designated as historic buildings when such buildings or structures are ~~judged by the Building Official to be~~ structurally safe.

SECTION 3. That Section 18.2.2.G of the City of Largo Comprehensive Development Code is amended to read as follows:

G. *Requirements not covered by the Property Maintenance Code* - Requirements necessary for the strength, stability or proper operation of an existing fixture, structure or equipment, or for the public safety, health and welfare not specifically covered by the Property Maintenance Code, shall be determined by the Building Official or Community Standards Manager.

SECTION 4. That Section 18.2.3.B of the City of Largo Comprehensive Development Code is amended to read as follows:

B. *Definitions*

(1) *Approved* - Approved by the Building Official or the appropriate City official where otherwise noted.

- (2) *Basement* - That portion of a building which is partly or completely below grade.
- (3) *Bathroom* - Any room containing plumbing fixtures including, but not limited to, a bathtub and/or a shower.
- (4) *Bedroom* - Any room or space used or intended to be used for sleeping purposes in either a dwelling or sleeping unit.
- (5) *Building Official* - The officer or other designated authority charged with the administration and enforcement of ~~this code~~ the Florida Building Code, or a duly authorized representative.
- (6) *Condemn* - To adjudge unfit for occupancy.
- (7) *Community Standards Manager* – Designated authority charged with the administration and enforcement of the Property Maintenance Code.
- (7)(8) *Dwelling Unit* - A single unit providing complete, independent living facilities for one or more persons, including permanent provisions for living, sleeping, eating, cooking and sanitation.
- (8)(9) *Easement* - That portion of land or property reserved for present or future use by a person or agency other than the legal fee owner(s) of the property. The easement shall be permitted to be for use under, on or above said lot or lots.
- (9)(10) *Exterior Property* - The open space on the premises and on adjoining property under the control of owners or operators of such premises.
- (10)(11) *Extermination* - The control and elimination of insects, rats or other pests by eliminating their harborage places; by removing or making inaccessible materials that serve as their food; by poison spraying, fumigating, trapping or by any other approved pest elimination methods.
- (11)(12) *Garbage* - The animal or vegetable waste resulting from the handling, preparation, cooking and consumption of food.
- (12)(13) *Guard or Guardrail* - A building component or a system of building components located at or near the open sides of elevated walking surfaces that minimizes the possibility of a fall from the walking surface to a lower level.
- (13)(14) *Habitable Space* - Space in a structure for living, sleeping, eating or cooking. Bathrooms, toilet rooms, closets, halls, storage or utility spaces, and similar areas are not considered habitable spaces.
- (14)(15) *Housekeeping Unit* - A room or group of rooms forming a single habitable space equipped and intended to be used for living, sleeping, cooking and eating which does not contain, within such a unit, a toilet, sink and bathtub or shower.
- (15)(16) *Imminent Danger* - A condition which could cause serious or life-threatening injury or death at any time.
- (16)(17) *Infestation* - The presence, within or contiguous to, a structure or premises of insects, rats, vermin or other pests.
- (17)(18) *Inoperable Motor Vehicle* - A vehicle which cannot be driven upon the public streets for reason including but not limited to being non-registered, wrecked, abandoned, in a state of disrepair, or incapable of being moved under its own power.
- (18)(19) *Labeled* - Devices, equipment, appliances, or materials to which has been affixed a label, seal, symbol or other identifying mark of a nationally recognized testing laboratory, inspection agency or other organization concerned with product evaluation that maintains periodic inspection of the production of the above-labeled items and by label the manufacturer attests to compliance with applicable nationally recognized standards.
- (19)(20) *Lavatory* - Also known as a sink.

- ~~(20)~~(21) *Let for Occupancy or Let* - To permit, provide or offer possession or occupancy of a dwelling, dwelling unit, rooming unit, building, premise or structure by a person who is or is not the legal owner of record thereof, pursuant to a written or unwritten lease, agreement or license, or pursuant to a recorded or unrecorded agreement of contract for the sale of land.
- ~~(21)~~(22) *Occupancy* - The purpose for which a building or portion thereof is utilized or occupied.
- ~~(22)~~(23) *Occupant* - Any individual living or sleeping in a building, or having possession of a space within a building.
- ~~(23)~~(24) *Openable Area* - That part of a window, skylight or door which is available for unobstructed ventilation and which opens directly to the outdoors.
- ~~(24)~~(25) *Operator* - Any person who has charge, care or control of a structure or premises which is let or offered for occupancy.
- ~~(25)~~(26) *Owner* - Any person, agent, operator, firm or corporation having a legal or equitable interest in the property; or recorded in the official records of the state, county or municipality as holding title to the property; or otherwise having control of the property, including the guardian of the estate of any such person, and the executor or administrator of the estate of such person if ordered to take possession of real property by a court.
- ~~(26)~~(27) *Person* - An individual, corporation, partnership or any other group acting as a unit.
- ~~(27)~~(28) *Premises* - A lot, plot or parcel of land, easement of public way, or right-of-way, including any structure thereon.
- ~~(28)~~(29) *Public Way* - Any street, alley or similar parcel of land essentially unobstructed from the ground to the sky, which is deeded, dedicated or otherwise permanently appropriated to the public for public use.
- ~~(29)~~(30) *Rooming Unit* - Any room or group of rooms forming a single habitable unit occupied or intended to be occupied for sleeping or living, but not for cooking purposes.
- ~~(30)~~(31) *Rubbish* - Combustible and noncombustible waste materials, except garbage; the term shall include residue from the burning of wood, coal, coke and other combustible materials, paper, rags, cartons, boxes wood, excelsior, rubber, leather, tree branches, yard trimmings, tin cans, metals, mineral matter, glass, crockery and dust and other similar materials.
- ~~(31)~~(32) *Sleeping Unit* - A room or space in which people sleep, which can also include permanent provisions for living, eating and either sanitation or kitchen facilities, but not both. Such rooms and spaces that are also part of a dwelling unit are not sleeping units.
- ~~(32)~~(33) *Structure* - That which is built or constructed or a portion thereof.
- ~~(33)~~(34) *Tenant* - A person, corporation, partnership or group, whether or not the legal owner of record, occupying a building or portion thereof as a unit.
- ~~(34)~~(35) *Toilet Room* - A room containing a toilet and a sink but not a bathtub or shower.
- ~~(35)~~(36) *Ventilation* - The natural or mechanical process of supplying conditioned or unconditioned air to, or removing such air from, any space.
- ~~(36)~~(37) *Water closet* - Also known as a toilet.
- ~~(37)~~(38) *Workmanlike* - Executed in a skilled manner; e.g., generally plumb, level, square, in line, undamaged and without marring adjacent work.
- ~~(38)~~(39) *Yard* - An open space on the same lot with a structure.

SECTION 5. That Section 18.2.4 of the City of Largo Comprehensive Development Code is amended to read as follows:

18.2.4 - Procedures

A. *Property maintenance inspection*

- (1) General - The ~~City Building~~ Community Standards Division shall coordinate and conduct all property maintenance inspections and the executive official in charge thereof shall be known as the ~~Building Official~~ Community Standards Manager.
- (2) Appointment - The Building Official and Community Standards Manager shall be appointed by the City Manager or designee.
- (3) Fees - The fees for activities and services performed by the Building Division in carrying out its responsibilities under the Property Maintenance Code shall be as indicated in the City of Largo Fee Ordinance.

B. *Duties and powers of the Building Official and Community Standards Manager*

- (1) General - The Building Official or Community Standards Manager shall enforce the Property Maintenance Code.
- (2) Rule-making authority - The Building Official or Community Standards Manager shall have authority as necessary in the interest of public health, safety and general welfare, to interpret and implement the provisions of the Property Maintenance Code; to secure the intent thereof; and to designate requirements applicable because of local climate or other conditions. Such rules shall not have the effect of waiving structural or fire performance requirements specifically provided for in the Property Maintenance Code, or of violating accepted engineering methods involving public safety.
- (3) Inspections - The Building Official or Community Standards Manager shall make all of the required inspections, or shall accept reports of inspections by approved agencies or individuals. All reports of such inspections shall be in writing and be certified by the person responsible for the required inspection.
- (4) Right of entry - The Building Official or Community Standards Manager is authorized to enter any structure or premises at reasonable times to inspect subject to constitutional restrictions on unreasonable searches and seizures. If entry is refused or not obtained, the Building Official is authorized to pursue recourse to obtain entry as provided by law.
- (5) Identification - The Building Official or Community Standards Manager shall carry proper identification when inspecting structures or premises in the performance of duties under the Property Maintenance Code.
- (6) Notices and orders - The Building Official or Community Standards Manager shall issue all necessary notices or orders to ensure compliance with the Property Maintenance Code.
- (7) Department records - The Building Official or Community Standards Manager shall keep official records of all business and activities of the department specified in the provisions of the Property Maintenance Code. Such records shall be retained in the official records as long as the building or structures to which such records relate remains in existence, unless otherwise provided for by other regulations or law.

C. *Approval*

- (1) Modifications - Whenever there are practical difficulties involved in carrying out the provisions of the Property Maintenance Code, the Building Official or Community Standards Manager shall have the authority to grant modifications for individual cases, provided the Building Official or Community Standards Manager ~~finds~~ find that the strict letter of the Property Maintenance Code impractical, the modification is in compliance with the intent and purpose of the Property Maintenance Code and such modification does not lessen health, life and fire safety

requirements. The details of an action granting modifications shall be in writing and maintained in the department files.

- (2) Alternative materials, methods and equipment - The Property Maintenance Code is not intended to prevent the installation of any material or to prohibit any method of construction not specifically prescribed by the Property Maintenance Code, provided that any such alternative has been approved by the Building Official. An alternative material or method of construction may be approved where the Building Official finds that the proposed design is satisfactory and complies with the intent of the provisions of the Property Maintenance Code, and that the material, method or work offered is, for the purpose intended, at least the equivalent of that prescribed in the Property Maintenance Code in quality, strength, effectiveness, fire resistance, durability and safety.
- (3) Required testing - Whenever there is insufficient evidence of compliance with the Property Maintenance Code, or evidence that a material or method does not conform to the requirements of the Property Maintenance Code, or in order to substantiate claims for alternative materials or methods, the Building Official shall have the authority to require tests to be made ~~as of~~ to determine compliance at the expense of the one holding the permit(s), the developer, or the property owner.
 - a. Test methods - Test methods shall be as specified in the Property Maintenance Code or by other recognized test standards. In the absence of recognized and accepted test methods, the Building Official shall be permitted to approve appropriate testing procedures performed by an approved agency.
- (4) Material and equipment reuse - Materials, equipment and devices shall not be reused unless such elements are in good repair or have been reconditioned and tested when necessary, placed in good and proper working condition and approved.

D. *Violations*

- (1) Unlawful acts - It shall be unlawful for a person, firm or corporation to be in conflict with or in

violation of any of the provisions of the Property Maintenance Code.

(2) Enforcement - The enforcement and notice provisions of this section are an additional and supplemental means of enforcing the Property Maintenance Code. Nothing contained in this section shall prohibit the City from enforcing the Property Maintenance Code by any other means legally available to the City.

~~(2)~~(3) Prosecution of violation - Any persons failing to comply with the Property Maintenance Code may be served a notice of violation. Any violation may be enforced through any legal or administrative proceedings available to the Building Official or Community Standards Manager, including proceedings in equity to enjoin, restrain, correct or abate such violation, or to require the removal or termination of an unlawful occupancy of the structure.

~~(3)~~(4) Abatement of violation - The institution of legal or administrative proceedings shall not preclude the Building Official or Community Standards Manager from instituting appropriate action to enjoin, restrain, correct or abate a violation, or to prevent illegal occupancy of a building, structure or premises, or to stop an illegal act, conduct, business or utilization of the building, structure or premises. Any costs incurred by the City in abating a violation shall constitute a lien upon the property where the violation is located.

E. Notices

(1) Notice to person responsible - Whenever the Building Official or Community Standards Manager determines that there has been a violation of the Property Maintenance Code, notice shall be given in the manner prescribed below to the person responsible for the violation as specified in the Property Maintenance Code. Notices for condemnation procedures shall also comply with the requirements of this subsection.

(2) Form - Such notice prescribed above shall be in accordance with all of the following:

a. Be in writing.

b. Include a description of the subject property that is sufficient for identification.

c. Include a statement of the violation or violations and why the notice is being issued.

d. Include a correction order allowing a reasonable time to make the repairs and improvements required to bring the dwelling unit or structure into compliance with the provisions of the Property Maintenance Code.

e. Inform the property owner of the right to appeal.

f. Include a statement of the City's right to file a lien in accordance with this subsection.

(3) Method of service: The notice shall be deemed to be properly served if a copy thereof is:

a. Delivered personally;

b. Sent by certified mail addressed to the alleged violator's last known address; or

c. If the notice is sent is returned by the post office showing that the certified letter was not delivered, a copy thereof shall be posted in a conspicuous place in or about the structure or on the property affected by such notice.

F. Unsafe structures and equipment

(1) General - When a structure or equipment is found by the Building Official or Community Standards Manager to be unsafe, or when a structure is found unfit for human occupancy, such structure may be condemned.

a. Unsafe structures - An unsafe structure is one that is found to be dangerous to the life, health, property or safety of the public or the occupants of the structure by not providing minimum safeguards to protect or warn occupants in the event of fire, or because such structure contains unsafe equipment or is so damaged, decayed, dilapidated, structurally unsafe or of such faulty construction or unstable foundation, that partial or complete collapse is possible.

b. Unsafe equipment - Unsafe equipment includes any boiler, heating equipment, elevator, moving stairway, electrical wiring or device, flammable liquid containers or other equipment on the premises or within the structure which is in such disrepair or condition that such equipment is a hazard to the life, health, property or safety of the public or occupants of the premises or structure.

c. Structure unfit for human occupancy - A habitable structure is unfit for human occupancy whenever the Building Official or Community Standards Manager ~~finds~~ find that such structure is unsafe or, because of the degree to which the structure is in disrepair or lacks maintenance, is unsanitary, vermin or rat infested, contains filth and contamination, or lacks ventilation, illumination, heating facility, sanitary or other essential equipment required by the Property Maintenance Code, or because the location of the structure constitutes a hazard to the occupants of the structure or to the public.

(2) Closing of vacant structures - If the structure is vacant and unfit for human habitation and occupancy, the Building Official or Community Standards Manager ~~is~~ are authorized to post a placard of condemnation on the premises and order the structure secured so as not to be an attractive nuisance. Upon failure of the owner to secure the premises within the time specified in the order, the Building Official or Community Standards Manager shall close and secure the premises through any available public agency or by contract or arrangement by private persons and the cost thereof shall be charged against the property upon which the structure is located and the costs shall constitute a lien upon such property and may be collected by any legal means.

(3) Notice - Whenever the Building Official or Community Standards Manager ~~condemn~~ has condemned a structure or equipment under the provisions of Section 18.2.4.F, notice shall be posted in a conspicuous place in or about the structure affected by such notice and served on the owner or the person or persons responsible for the structure or equipment in accordance with Section 18.2.4.E. If the notice pertains to equipment, it shall also be placed on the condemned equipment in the form prescribed by Section 18.2.4.E.

(4) Placarding - Upon failure of the owner or persons responsible to comply with the Property Maintenance Code within the time given in the notice, the Building Official or Community Standards Manager shall post on the premises or on the defective equipment a placard bearing the word "Condemned" and a statement of the penalties provided for occupying the premises, operating the equipment or removing the placard.

a. Placard removal - The Building Official or Community Standards Manager shall remove the condemnation placard whenever the defect or defects upon which the condemnation and placarding actions were based have been eliminated. Any person who defaces or removes a condemnation placard without the approval of the Building Official or Community Standards Manager shall be subject to penalties provided by the Property Maintenance Code.

(5) Prohibited occupancy - Any occupied structure condemned and placarded by the Building Official or Community Standards Manager shall be vacated as ordered by the Building Official or Community Standards Manager.

Any person who shall occupy a placarded premises or shall operate placarded equipment shall be in violation of the Property Maintenance Code.

G. *Emergency measures*

(1) Imminent danger - When, in the opinion of the Building Official or his/her designee, there is imminent danger of failure or collapse of a building or structure which endangers life, or when any structure or part of a structure has fallen and life is endangered by the occupation of a structure, or when there is actual or potential danger to the building occupants or those in the proximity of any structure because of explosives, explosive fumes or vapors or the presence of toxic fumes, gases or materials, or operation of defective or dangerous equipment, the Building Official is authorized and empowered to require the occupants to vacate the premises forthwith.

The City of Largo Building Official shall cause to be posted at each entrance of such structure a notice reading as follows: "This Structure is Unsafe and Its Occupancy Has Been Prohibited by the Building Official." It shall be unlawful for any person to enter such structure except for the purpose of securing the structure, making the required repairs, removing the hazardous condition or of demolishing the same.

- (2) Temporary safeguards - Notwithstanding other provisions of the Property Maintenance Code, whenever, in the opinion of the Building Official or Community Standards Manager, there is imminent danger to the health and safety of the occupant(s) or public due to unsafe conditions, the Building Official or Community Standards Manager may order the necessary work to be done, including the boarding up of openings, to render such structure temporarily safe whether or not the legal procedures described have been instituted; and may cause such other action to be taken as the Building Official or Community Standards Manager deems necessary to abate such emergency.
- (3) Closing streets - When necessary for public safety, the Building Official or Community Standards Manager may temporarily close structures and close, or request the authority having jurisdiction to close, sidewalks, streets, public ways and places adjacent to unsafe structures and prohibit the same from being utilized.
- (4) Emergency repairs - The City may perform the necessary work to temporarily safeguard the premises. The costs incurred by the City shall constitute a lien on the property where the violation is located.
- (5) Hearing - Any person ordered to take emergency measures shall comply with such order forthwith. Any affected person shall thereafter, upon petition directed to the Code Enforcement Board or Special Magistrate be afforded a hearing as described in the Property Maintenance Code.

H. *Demolition*

- (1) General - The Building Official shall order the owner of any premises upon which is located any structure, which in the Building Official's judgment is so old, dilapidated or has become so out of repair as to be dangerous, unsafe, insanitary or otherwise unfit for habitation or occupancy, and such that it is unreasonable to repair the structure, to demolish and remove such structure; or if such structure is capable of being made safe by repairs, to repair and make safe and sanitary or to demolish and remove at the owner's option; or where there has been a cessation of normal construction of any structure for a period of more than two years, to demolish and remove such structure, or portions thereof.
- (2) Notices and orders - All notices and orders shall comply with Section 18.3.4.E.
- (3) Failure to comply - If the owner of a premises fails to comply with a demolition order within the time prescribed, the Building Official may cause the structure to be demolished and removed, either through an available public agency or by contract or arrangement with private persons, and the cost of such demolition and removal shall be charged against the property upon which the structure is located and the costs shall constitute a lien upon such real estate.

I. *Means of appeal*

- (1) Application for appeal - Any person directly affected by a decision of the Building Official or Community Standards Manager or a notice or order issued under the Property Maintenance Code shall have the right to appeal said decision, notice or order to the Code Enforcement Board or Special Magistrate, provided that a written application for appeal is filed within twenty (20) days after the day of the decision, notice or order was served. An application for appeal shall be based on a claim that the true intent of the Property Maintenance Code has been incorrectly interpreted, the provisions of the Property Maintenance Code do not fully apply, or the requirements of the Property Maintenance Code are adequately satisfied by other means. The notice of appeal shall state the basis for the appeal and the facts that support the appeal.

- (2) Notice of meeting – The ~~Board~~ Code Enforcement Board or Special Magistrate shall meet upon notice from the ~~Building Official~~ Community Standards Manager, within thirty (30) days of the filing of an appeal.
- (3) Open hearing - The appellant, the appellant's representative, the Building Official ~~or Community Standards Manager~~ and any person whose interests are affected shall be given an opportunity to be heard.
- (4) Procedure - The Code Enforcement Board or Special Magistrate shall adopt and make available to the public through the ~~board secretary~~ Code Enforcement Board or Special Magistrate procedures under which a hearing will be conducted. The procedures shall not require compliance with strict rules of evidence, but shall mandate that only relevant information be received.
- (5) ~~Board Code Enforcement Board or Special Magistrate~~ decision - The ~~Board Code Enforcement Board or Special Magistrate~~ shall affirm, modify or reverse the decision of the Building Official ~~or Community Standards Manager~~ by a vote of a majority of the total number of ~~Board Code Enforcement Board members or Special Magistrate~~ present at the hearing.
- (6) Court Review - A party shall have the right to appeal the ~~Board's~~ Board Code Enforcement Board or Special Magistrate's decision by the filing of a petition for a writ of certiorari in the circuit court in the manner and time required by law.

SECTION 6. That all ordinances or parts thereof inconsistent herewith are hereby repealed and superseded.

SECTION 7. That it is the intention of the City Commission that each provision hereof be considered severable, and, if any section, subsection, sentence, clause, or provision of this ordinance is held invalid, the remainder of the ordinance shall not be affected.

SECTION 8. That this ordinance shall become effective immediately upon its final passage and adoption.

APPROVED ON FIRST READING _____

PASSED AND ADOPTED ON
SECOND AND FINAL READING _____

ATTEST:

CITY OF LARGO, FLORIDA

Diane Bruner, City Clerk

Louis ("Woody") L. Brown, Mayor

REVIEWED AND APPROVED

Alan Zimmet, City Attorney