Los Angeles County Municipal Storm Water Permit (Order 01-182)
Individual Annual Report Form
Attachment U-4

ATTACHMENT III-F-3

AMENDMENT TO THE STORMWATER ORDINANCE

ORDINANCE NO. 181899

An ordinance amending Sections 64.70.01 and 64.72 of Article 4.4 of Chapter VI of the Los Angeles Municipal Code to expand the applicability of the existing Standard Urban Stormwater Mitigation Plan (SUSMP) requirements by imposing rainwater Low Impact Development (LID) strategies on projects that require building permits; and amending Section 64.72.05 of Article 1 of Chapter IX of the Los Angeles Municipal Code to collect fees to recover Bureau of Sanitation costs of administering the provisions of this Ordinance.

WHEREAS, the City of Los Angeles is authorized by Article XI, §5 and §7 of the State Constitution to exercise the police power of the State by adopting regulations to promote public health, public safety and general prosperity;

WHEREAS, the City of Los Angeles has authority under the California Water Code to adopt and enforce ordinances imposing conditions, restrictions and limitations with respect to any activity that might degrade the quality of waters of the State;

WHEREAS, the City of Los Angeles has applied an integrated approach to incorporate wastewater, stormwater and runoff, and recycled water management into a single strategy through its Integrated Resources Plan;

WHEREAS, the City of Los Angeles is committed to a stormwater management program that protects water quality and water supply by employing watershed-based approaches that balance environmental and economic considerations;

WHEREAS, the purpose of this Ordinance includes, but is not limited to, rainwater harvesting and stormwater runoff management, water conservation, and recycled water reuse and gray water use, which are all key elements of the City of Los Angeles "Water Supply Action Plan" and are essential to ensuring responsible and sustainable development;

WHEREAS, urbanization has led to increased impervious surface areas resulting in increased water runoff and less percolation to groundwater aquifers causing the transport of pollutants to downstream receiving waters;

WHEREAS, the City of Los Angeles needs to take a new approach to managing rainwater and urban runoff while mitigating the negative impacts of development and urbanization;

WHEREAS, the City of Los Angeles' Los Angeles River Revitalization Plan has identified reduction in peak stormwater runoff in the Los Angeles River as necessary to implement many of the Los Angeles River revitalization projects;

WHEREAS, LID is widely recognized as a sensible approach to managing the quantity and quality of stormwater runoff by setting standards and practices to maintain

or restore the natural hydrologic character of a development site, reduce off-site runoff, improve water quality, and provide groundwater recharge; and

WHEREAS, it is the intent of the City of Los Angeles to expand the applicability of the existing Standard Urban Stormwater Mitigation Plan requirements by providing stormwater and rainwater LID strategies for all projects that require building permits.

NOW THEREFORE,

THE PEOPLE OF THE CITY OF LOS ANGELES DO ORDAIN AS FOLLOWS:

Section 1. Section 64.70.01 of Article 4.4 of Chapter VI of the Los Angeles Municipal Code is amended in its entirety to read as follows:

SEC. 64.70.01. DEFINITIONS AND ABBREVIATIONS.

A. Definitions. For the purpose of this Article, the following words and phrases are defined and shall be construed as set out here, unless it is apparent from the context that they have a different meaning:

1. "**Basin Plan**" means a Water Quality Control Plan adopted by the California Regional Water Quality Control Board for a specific watershed or designated area.

2. "**Best Management Practice (BMP)**" means activities, practices, facilities, and/or procedures that when implemented will reduce or prevent pollutants in discharges.

3. "**Board**" means the Board of Public Works of the City of Los Angeles or its duly authorized representative.

4. "**Bureau**" means the Bureau of Sanitation of the City of Los Angeles or its duly authorized representative.

5. "**City**" means the City of Los Angeles or its duly authorized representatives.

6. "**Clean Water Act (CWA)**" means the Federal Water Pollution Control Act enacted in 1972, by Public Law 92-500, and amended by the Water Quality Act of 1987. The Clean Water Act prohibits the discharge of pollutants to Waters of the United States unless the discharge is in accordance with an NPDES permit.

7. "**Commercial Activity**" means any public or private activity involved in the storage, transportation, distribution, exchange or sale of goods and/or commodities or providing professional and/or non-professional services.

8. "**Construction Activity**" means clearing, grading, or excavating that results in soil disturbance. Construction activity does not include routine maintenance to maintain original line and grade, hydraulic capacity, or the original purpose of the facility, nor does it include emergency construction activities required to immediately protect public health and/or safety.

9. "**Control**" means to minimize, reduce or eliminate by technological, legal, contractual or other means, the discharge of pollutants from an activity or activities.

10. **"Development"** means the construction, rehabilitation, redevelopment or reconstruction of any public or private residential project (whether single-family, multi-unit or planned unit development); industrial, commercial, retail and any other non-residential projects, including public agency projects; or mass grading for future construction.

11. **"Development Best Management Practices Handbook"** means such handbook, as may be amended from time to time, adopted by the Board of Public Works.

12. "**Director**" means the Director of the Bureau of Sanitation of the Department of Public Works of the City of Los Angeles or the duly authorized representatives designated to administer, implement and enforce the provisions of this Article.

13. "**Discharge**" means any release, spill, leak, pump, flow, escape, dumping, or disposal of any liquid, semi-solid or solid substance.

14. **"Environmentally Sensitive Areas (ESAs)"** means an area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which would be easily disturbed or degraded by human activities and developments (See California Public Resources Code § 30107.5). ESAs include, but are not limited to, areas designated as Significant Ecological Areas by the County of Los Angeles (Los Angeles County Significant Areas Study, Los Angeles County Department of Regional Planning (1976) and amendments); areas designated as Significant Natural Areas by the California Department of Fish and Game's Significant Natural Areas Program and field verified by the Department of Fish and Game; and areas listed in the Basin Plan as supporting the "Rare, Threatened, or Endangered Species (RARE)" beneficial use.

15. "**Hazardous Material(s)**" means any material(s) defined as hazardous by Division 20, Chapter 6.95 of the California Health and Safety Code.

16. "**Illicit Connection**" means any man-made conveyance that is connected directly to the storm drain system, excluding roof-drains, and any other similar connection that serves as a pathway for any illicit discharge.

17. "**Illicit Discharge**" means any discharge to the storm drain system that is prohibited under local, state or federal statutes, ordinances, codes or regulations. Illicit discharges include all non-stormwater discharges except discharges pursuant to an NPDES permit or discharges that are exempted or conditionally exempted by the NPDES permit or granted as a special waiver or exemption by the Regional Board.

18. "**Impervious Surface**" means any man-made or modified surface that prevents or significantly reduces the entry of water into the underlying soil, resulting in runoff from the surface in greater quantities and/or at an increased rate, when compared to natural conditions prior to development. Examples of places that commonly exhibit impervious surfaces include parking lots, driveways, roadways, storage areas, and rooftops. The imperviousness of these areas commonly results from paving, compacted gravel, compacted earth, and oiled earth.

19. "**Industrial Activity**" means any public or private activity that is associated with any of the 11 categories of activities defined in 40 CFR 122.26(b)(14) and required to obtain a NPDES permit.

20. "**Industrial/Commercial Facility**" means any facility involved and/or used in either the production, manufacture, storage, transportation, distribution, exchange or sale of goods and/or commodities, and any facility involved and/or used in providing professional and non-professional services. This category of facility includes, but is not limited to, any facility defined by the Standard Industrial Classifications (SIC). Facility ownership (federal, state, municipal, private) and profit motive of the facility are not factors in this Definition.

21. **"LID"** means Low Impact Development.

22. "**Maximum Extent Practicable (MEP)**" means the standard for implementation of stormwater management programs to reduce pollutants in stormwater. MEP refers to stormwater management programs taken as a whole. It is the maximum extent possible taking into account equitable considerations and competing facts, including but not limited to, the gravity of the problem, public health risk, societal concern, environmental benefits, pollutant removal effectiveness, regulatory compliance, public acceptance, ability to implement, cost, and technical feasibility. Section 402(p) of the Clean Water Act requires that municipal permits shall require controls to reduce the discharge of

pollutants to the maximum extent practicable, including management practices, control techniques and systems, design and engineering methods, and other provisions as the Administrator or the State determines appropriate for the control of these pollutants.

23. "**National Pollutant Discharge Elimination System (NPDES)**" means a permit issued by the U.S. EPA, State Water Resources Control Board, or the California Regional Water Quality Control Board pursuant to the Clean Water Act that authorizes discharges to Waters of the United States and requires the reduction of pollutants in the discharge.

24. "**Non-Stormwater Discharge**" means any discharge to a municipal storm drain system that is not composed entirely of stormwater.

25. "**Person**" means any individual, partnership, co-partnership, firm, company, corporation, association, joint stock company, trust, estate, governmental entity or any other legal entity, or their legal representatives, agents or assigns. The masculine gender shall include the feminine and the singular shall include the plural where indicated by the context.

26. "**Pollutant**" means any "pollutant" defined in Section 502(6) of the Federal Clean Water Act or incorporated into the California Water Code Sec. 13373. Pollutants may include, but are not limited to the following:

(a) Commercial and industrial waste (such as fuels, solvents, detergents, plastic pellets, hazardous substances, fertilizers, pesticides, slag, ash, and sludge);

(b) Metals (such as cadmium, lead, zinc, copper, silver, nickel, chromium, and non- metals such as phosphorus and arsenic);

(c) Petroleum hydrocarbons (such as fuels, lubricants, surfactants, waste oils, solvents, coolants, and grease);

(d) Excessive eroded soil, sediment, and particulate materials in amounts that may adversely affect the beneficial use of the receiving waters, flora or fauna of the State;

(e) Animal wastes (such as discharge from confinement facilities, kennels, pens, recreational facilities, stables, and show facilities); and

(f) Substances having characteristics such as pH less than 6 or greater than 9, or unusual coloration or turbidity, or excessive levels of fecal coliform, or fecal streptococcus, or enterococcus.

27. "**Receiving Waters**" means all surface water bodies within Los Angeles County that are identified by the Regional Board in a Basin Plan.

28. **"Redevelopment"** means land-disturbing activity that results in the creation, addition, or replacement of 500 square feet or more of impervious surface area on an already developed Site. Redevelopment includes, but is not limited to: the expansion of a building footprint; addition or replacement of a structure; replacement of impervious surface area that is not part of routine maintenance activity; and land disturbing activity related to structural or impervious surfaces. It does not include routine maintenance to maintain original line and grade, hydraulic capacity, or original purpose of facility, nor does it include emergency construction activities required to immediately protect public health and safety.

29. "**Regional Board**" means the California Regional Water Quality Control Board, Los Angeles Region.

30. "**Rules and Regulations**" shall mean Rules and Regulations adopted by the Board of Public Works Governing Pollution Control of Discharges into the Storm Drain System.

31. **"Site"** means land or water area where any "facility or activity" is physically located or conducted, including adjacent land used in connection with the facility or activity.

32. "**Storm Drain System**" means any facilities or any part of those facilities, including streets, gutters, conduits, natural or artificial drains, channels and watercourses that are used for the purpose of collecting, storing, transporting or disposing of stormwater and are located within the City of Los Angeles.

33. "**Storm Water or Stormwater**" means water that originates from atmospheric moisture (rainfall or snow melt) and that falls onto land, water, or other surfaces. Without any change in its meaning, this term may be spelled or written as one word or two separate words.

34. "**Stormwater Pollution Prevention Plan (SWPPP)**" means a plan required by and for which contents are specified in the State of California General Permit for Storm Water Discharges Associated with Industrial Activities or for Stormwater Discharges Associated with Construction Activities.

35. "**Stormwater Runoff**" means that part of precipitation (rainfall or snowmelt) which travels across a surface to the storm drain system or receiving waters.

36. "**Toxic Materials**" For purposes of compliance with the Los Angeles County Municipal Stormwater Permit, the term "toxic materials" means

any material(s) or combination of materials that directly or indirectly cause either acute or chronic toxicity in the water column.

37. "**Untreated**" means non stormwater runoff, wastewater or wash waters that have not been subjected to any applicable Treatment Control, Best Management Practices or are not in compliance with conditions of a separate or general NPDES permit.

38. "**Urban Runoff**" means surface water flow produced by storm and non-storm events. Non-storm events include flow from residential, commercial or industrial activities involving the use of potable and non-potable water.

Sec. 2. Section 64.72 of Article 4.4 of Chapter VI is amended to read as follows:

SEC. 64.72. STORMWATER POLLUTION CONTROL MEASURES FOR DEVELOPMENT PLANNING AND CONSTRUCTION ACTIVITIES

(A) Objective. The provisions of this Section contain requirements for construction activities and facility operations of Development and Redevelopment projects to comply with the requirements of the Standard Urban Stormwater Mitigation Plan, integrate LID practices and standards for stormwater pollution mitigation, and maximize open, green and pervious space on all Developments and Redevelopments consistent with the City's landscape ordinance and other related requirements in the Development Best Management Practices Handbook. LID shall be inclusive of SUSMP requirements.

(B) Scope. This Section contains requirements for stormwater pollution control measures in Development and Redevelopment projects and authorizes the Board to further define and adopt stormwater pollution control measures, develop LID principles and requirements, including but not limited to the objectives and specifications for integration of LID strategies, collect Best Management Practices compliance plan check fees, grant waivers from the requirements of the Standard Urban Stormwater Mitigation Plan, collect funds for projects that are granted waivers, conduct inspections, cite violators for infractions, and impose fines. Except as otherwise provided herein, the Board shall administer, implement and enforce the provisions of this Section.

(C) LID Requirements. All Developments and Redevelopments shall comply with the following:

1. Development or Redevelopment Involving four or Fewer Units Intended for Residential Use.

a. Development or Redevelopment less than one acre shall implement LID BMP alternatives identified in the Development Best Management Practices Handbook; and

b. Development or Redevelopment one acre or greater shall comply with the standards and requirements of this Article and with the Development Best Management Practices Handbook.

2. Development or Redevelopment Involving Nonresidential Use or five or More Units Intended for Residential Use.

a. Development or Redevelopment resulting in an alteration of at least fifty percent (50%) or more of the impervious surfaces on an existing developed Site, the entire Site must comply with the standards and requirements of this Article and with the Development Best Management Practices Handbook; and

b. Development or Redevelopment resulting in an alteration of less than fifty percent (50%) of the impervious surfaces of an existing developed Site, only such incremental Development shall comply with the standards and requirements of this Article and with the Development Best Management Practices Handbook.

3. A Development or Redevelopment of any size that would create 2,500 square feet or more of impervious surface area and is located partly or wholly within an ESA shall comply with the standards and requirements of this Article and with the Development Best Management Practices Handbook.

4. The Site for every Development or Redevelopment shall be designed to manage and capture stormwater runoff, to the maximum extent feasible, in priority order: infiltration, evapotranspiration, capture and use, treated through high removal efficiency biofiltration/biotreatment system of all of the runoff on site. High removal efficiency biofiltration/biotreatment systems shall comply with the standards and requirements of the Development Best Management Practices Handbook. A LID Plan shall be prepared to comply with the following:

a. Stormwater runoff will be infiltrated, evapotranspired, captured and used, treated through high removal efficiency Best Management Practices, onsite, through stormwater management techniques that comply with the provisions of the Development Best Management Practices Handbook. To the maximum extent feasible, onsite stormwater management techniques must be properly sized, at a minimum, to infiltrate, evapotranspire, store for use, treat through high removal efficiency biofiltration/biotreatment system, without any storm water runoff leaving the Site for at least the volume of water produced by the quality design storm event that results from:

(i) The 85th percentile 24-hour runoff event determined as the maximized capture stormwater volume for the area using a 48

to 72-hour draw down time, from the formula recommended in Urban Runoff Quality Management, WEF Manual of Practice No. 23/ASCE Manual of Practice No. 87, (1998); or

(ii) The volume of annual runoff based on unit basin storage water quality volume, to achieve 80 percent or more volume treatment by the method recommended in the California Stormwater Best Management Practices Handbook – Industrial/Commercial, (2003); or

(iii) The volume of runoff produced from a 0.75 inch storm event.

For purposes of compliance with the LID requirements, and without changing the priority order of design preferences identified in this Section, all runoff from the water quality design storm event, as identified in Paragraph (a) of this Subdivision, that has been treated through an onsite high removal efficiency biofiltration/biotreatment system shall be deemed to have achieved 100% infiltration regardless of the runoff leaving the Site from an onsite high removal efficiency biofiltration/biotreatment system, and thus any runoff volume shall not be subject to the offsite mitigation requirement of this Article.

b. Pollutants shall be prevented from leaving the Site for a water quality design storm event as defined in Paragraph (a) of this Subdivision unless it has been treated through an onsite high removal efficiency biofiltration/biotreatment system.

c. Hydromodification impacts shall be minimized to natural drainage systems as defined in the MS4 Permit.

5. When, as determined by the Director, the onsite LID requirements are technically infeasible, partially or fully, as defined in the Development Best Management Handbook, the infeasibility shall be demonstrated in the submitted LID Plan, shall be consistent with other City requirements, and shall be reviewed in consultation with the Department of Building and Safety. The technical infeasibility may result from conditions that may include, but are not limited to:

a. Locations where seasonal high groundwater is within ten feet of surface grade;

b. Locations within 100 feet of a groundwater well used for drinking water;

c. Brownfield Development sites or other locations where pollutant mobilization is a documented concern;

d. Locations with potential geotechnical hazards;

e. Locations with impermeable soil type as indicated in applicable soils and geotechnical reports; and

f. Other site or implementation constraints identified in the Development Best Management Practices Handbook.

6. If partial or complete onsite compliance of any type is technically infeasible, the project Site and LID Plan shall be required to comply with all applicable Standard Urban Stormwater Mitigation Plan (SUSMP) requirements in order to maximize onsite compliance. For the remaining runoff that cannot feasibly be managed onsite, the project shall implement offsite mitigation on public and/or private land within the same sub-watershed out of the following five sub-watersheds: Upper Los Angeles River, Lower Los Angeles River, Ballona Creek, Santa Monica Bay, and Dominguez Channel. This shall include construction and perpetual maintenance of projects that will achieve at least the same level of runoff retention, infiltration and/or use, and water quality. All City Departments will assist the developer, when and where feasible, in the design, permitting and implementation of LID BMP projects within the public right of way, with a preference for utilizing the public right of way immediately adjacent to the subject development.

7. A Multi-Phased Project may comply with the standards and requirements of this Section for all of its phases by: (a) designing a system acceptable to the Bureau of Sanitation to satisfy these standards and requirements for the entire Site during the first phase, and (b) implementing these standards and requirements for each phase of Development or Redevelopment of the Site during the first phase or prior to commencement of construction of a later phase, to the extent necessary to treat the stormwater from such later phase. For purposes of this Section, "Multi-Phased Project" shall mean any Development or Redevelopment implemented over more than one phase and the Site of a Multi-Phased Project shall include any land and water area designed and used to store, treat or manage stormwater runoff in connection with the Development or Redevelopment, including any tracts, lots, or parcels of real property, whether Developed or not, associated with, functionally connected to, or under common ownership or control with such Development or Redevelopment.

8. The Director shall prepare, maintain, and update, as deemed necessary and appropriate, the Development Best Management Practices Handbook to set LID standards and practices and standards for stormwater pollution mitigation, including urban and stormwater runoff quantity and quality control development principles and technologies for achieving the LID standards. The Development Best Management Practices Handbook shall also include technical feasibility and implementation parameters, alternative compliance for

technical infeasibility, as well as other rules, requirements and procedures as the Director deems necessary for implementing the provisions of this Section of the Los Angeles Municipal Code. The Board of Public Works shall adopt the Development Best Management Practices Handbook no later than 90 days after the adoption of this Ordinance by the City Council and the Mayor.

9. The Director of the Bureau of Sanitation shall develop as deemed necessary and appropriate, in cooperation with other City departments and stakeholders, informational bulletins, training manuals and educational materials to assist in the implementation of the LID requirements.

10. The applicant can appeal the Director's determination of compliance with the provisions of this Article to the Board of Public Works within 30 days of the date of the determination.

11. Any Development or Redevelopment that is exempted from LID requirements under section D has the option to voluntarily opt in and incorporate into the project the LID requirements set forth herein. In such case, the Best Management Practices plan check fee associated with the project shall be waived and all LID related plan check processes shall be expedited.

12. Any Development or Redevelopment exempted from this Ordinance under section D shall comply with all applicable SUSMP requirements.

(D) Exceptions to LID Requirements. The provisions of this Section do not apply to any of the following:

1. A Development or Redevelopment that only creates, adds or replaces less than 500 square feet of impervious area;

2. A Development or Redevelopment involving only emergency construction activity required to immediately protect public health and safety;

3. Infrastructure projects within the public right-of-way;

4. A Development or Redevelopment involving only activity related to gas, water, cable, or electricity services on private property;

5. A Development or Redevelopment involving only re-striping of permitted parking lots;

6. A project involving only exterior movie or television production sets, or facades on an existing developed site.

(E) Other Agencies of the City of Los Angeles. All City of Los Angeles departments, offices, entities and agencies, shall establish administrative procedures necessary to implement the provisions of this Article on their Development and Redevelopment projects and report their activities annually to the Board of Public Works.

Sec. 3. Section 64.72.05 of Article 4.4 of Chapter VI of the Los Angeles Municipal Code is amended to read:

SEC. 64.72.05. LID PLAN CHECK FEES.

(A) Before review and approval of a set of plans and specifications for checking, the applicant shall pay a Best Management Practices plan check fee.

(B) The fee schedule for providing Best Management Practices plan check services for LID Implementation Plan, Standard Urban Stormwater Mitigation Plan (SUSMP), or Site Specific Mitigation Plan (SSMP) is as follows:

DEVELOPMENT CATEGORY	FEES
Development or Redevelopment less than 500 square feet	Exempt
Residential, 4 Units or Less:	
For Development or Redevelopment greater than or equal to 500 square feet and less than 2,500 square feet	$20 / Project
For Development or Redevelopment greater than or equal to 2,500 square feet	$200 / Project
Development or Redevelopment of any size that would create 2,500 square feet or more of impervious surface area and is located partly or wholly within an ESA*	$700 / Project
Nonresidential Use or 5 or More Units Intended for Residential Use:	
For Redevelopment that results in an alteration of less than fifty (50) percent of the impervious surfaces of an existing developed Site	$800 / Project
For new Development or where Redevelopment that results in an alteration of at least fifty (50) percent or more of the impervious surfaces of an existing developed Site	$1,000 / Project

* Projects located in, adjacent to, or discharging directly to a designated Environmentally Sensitive Area (ESA)

(C) At the discretion of the Bureau of Sanitation, a large scale project may be categorized as a Special Project and billed on actual cost incurred by the City.

(D) Off-hour Plan Check Fee. An applicant may apply to have the Bureau of Sanitation provide plan check services at other than normal working hours. If the Bureau approves an expedited application, the applicant must pay to the Bureau, in addition to the fees identified in Subsection B of this Section, an additional fifty percent of the fees owed.

(E) All entities, including City Departments and other public agencies, are required to pay the fees identified in Subsection B of this Section.

(F) All monies collected pursuant to the provisions of this Section shall be placed and deposited into the Stormwater Pollution Abatement Fund, under a separate account for each sub-watershed, established by Section 64.51.11 of this Code.

Sec. 4. The provisions of this Ordinance shall be operative 180 days after the effective date of the Ordinance, except that the provisions shall not apply to any of the following:

1. Any Development or Redevelopment for which the Department of Building and Safety accepted a permit application before the effective date of this Ordinance, and for which the permit applicant paid, before the effective date of this Ordinance, to the Department of Building and Safety all fees required by the Department to process the permit application; or

2. Any Development or Redevelopment for which a required entitlement application was filed with the Department of City Planning, and for which Department review of the application, with the exception of CEQA review, was deemed complete by the Department before the operative date of this Ordinance.

Sec. 5. If any provision of this Ordinance is found to be unconstitutional or otherwise invalid by any court of competent jurisdiction, such invalidity shall not affect the validity or enforceability of the remaining provisions of this Ordinance, and the provisions of this Ordinance are declared to be severable.

Sec. 6. The City Clerk shall certify to the passage of this ordinance and have it published in accordance with Council policy, either in a daily newspaper circulated in the City of Los Angeles or by posting for ten days in three public places in the City of Los Angeles: one copy on the bulletin board located at the Main Street entrance to the Los Angeles City Hall; one copy on the bulletin board located at the Main Street entrance to the Los Angeles City Hall East; and one copy on the bulletin board located at the Temple Street entrance to the Los Angeles County Hall of Records.

I hereby certify that this ordinance was passed by the Council of the City of Los Angeles, at its meeting of SEP 27 2011.

JUNE LAGMAY, City Clerk

By _____
Deputy

Approved OCT 07 2011

_____
Mayor

Approved as to Form and Legality:

CARMEN A. TRUTANICH, City Attorney

By _____
JOHN A. CARVALHO
Deputy City Attorney

Date Aug 5, 2011

File No. 09-1554

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