RESOLUTION NO. HO-2009-022

A RESOLUTION OF A HEARING OFFICER OF THE CITY OF NEWPORT BEACH DENYING WITH PREJUDICE USE PERMIT NO. 2008-033 TO ALLOW AN EXISTING GROUP RESIDENTIAL USE TO CONTINUE AT 1216 WEST BALBOA BOULEVARD, NEWPORT BEACH, CALIFORNIA (PA2008-104)

WHEREAS, Ordinance No. 2008-05 was adopted by the Newport Beach City Council on January 22, 2008, following noticed public hearings; and

WHEREAS, the adoption of Ordinance No. 2008-05 amended the City of Newport Beach's Municipal Code (NBMC) relating to Group Residential Uses; and

WHEREAS, Ordinance No. 2008-05 added Chapter 20.91A to the NBMC. Chapter 20.91A sets forth a process by which existing group residential care facilities, except for state-licensed drug or alcohol treatment homes serving six or fewer clients and not operating integrally with other uses, must apply for use permits to remain in operation beyond February 2009; and

WHEREAS, Newport Coast Recovery, LP, located at 1216 West Balboa Boulevard ("Use Location") in Newport Beach, California is today a residential care facility located in an apartment complex with seven dwelling units that is a state-licensed alcohol or drug residential treatment home for up 29 persons (ADP License No. 300156AP); and

WHEREAS, Newport Coast Recovery, LP ("Use") applied for Use Permit No. 2008-033 to continue its operations as an 18 bed facility under Ordinance No. 2008-05 within the applicable time period, and a noticed public hearing was held on Monday, December 8, 2008, at the Newport Beach City Council Chambers where public testimony was taken, including testimony from the applicant, and this hearing was continued to Monday, January 12, 2009, also at the Newport Beach City Council Chambers where more public testimony was received including testimony from the applicant; and

WHEREAS, in order to allow an existing group residential care facility to remain in operation, a Hearing Officer must find, following a noticed public hearing, that all four of the findings identified in NBMC §20.91.035.A and all seven of the findings identified in NBMC §20.91A.060 can be met; and

WHEREAS, both hearings were presided over by Thomas W. Allen, Hearing Officer for the City of Newport Beach; who determined not all findings could be made and adopted Resolution HO-2009-001 on February 4, 2009, denying with prejudice Use Permit No. 2008-033; and

WHEREAS, on February 11, 2009, the applicant filed an appeal of the Hearing Officer's decision to deny Use Permit No. 2009-003, and

WHEREAS, on April 14, 2009, a public hearing conducted by City Council was held at the Newport Beach City Council Chambers, where testimony was taken, including testimony from city staff, the applicant, and the public; and

WHEREAS, at the April 14, 2009, hearing the City Council was informed that new evidence was acquired after the close of the public hearing conducted by the Hearing Officer on January 12, 2009, which was not admissible and could not be considered by City Council in making a determination on the appeal; and

WHEREAS, the City Council determined the new evidence was relevant to the substance of the application for a group residential use permit, and remanded the matter to the Hearing Officer for consideration of the newly acquired evidence only; and

WHEREAS, a noticed public hearing presided over by Hearing Officer Thomas W. Allen was held on Tuesday, July 7, 2009, at the Newport Beach City Council Chambers where testimony was taken, including testimony from city staff, the applicant, and the public; and

WHEREAS, after considering the newly acquired evidence the Hearing Officer determined that Finding 3 of NBMC §20.91.035.A cannot be made with respect to compliance with the provisions of the Code, and Finding A of NBMC §20.91A.060 cannot be made with respect to the development and operational standards specified in NBMC §20.91A.050, and directed staff to prepare a supplemental resolution of denial which shall supersede Resolution No. HO-2009-001; and

WHEREAS, the Use Location is within the Nonstandard Subdivision Area as defined by Ordinance No. 2008-05; and

WHEREAS, proximate to the Use Location are the following uses referred to in NBMC §20.91A.060 (D):

1. Within 300 feet: Balboa Horizons Recovery Services (11 bed licensed treatment facility located at 1132 West Balboa Boulevard, with an approved use permit) is one block east of the Use Location, on the same side of the street.
2. Within 300 feet and across the street: Newport Elementary School for students in grades Kindergarden through 5th grade located at 1327 West Balboa Boulevard.
3. Within 750 feet: Christ Church's large (44 children capacity) state-licensed day care center located at 1400 West Balboa Boulevard.

4. Within 1250 feet: Outlets for alcoholic beverages are the American Legion Hall located at 215 W. 15th Street and Fry's Market located at 115 E. 15th Street.

NOW THEREFORE BE IT RESOLVED:

Section 1. That Findings B and C and Findings E - G of NBMC §20.91A.060 can be made for the following reasons:

NBMC §20.91A.060 Finding B: The project includes sufficient on-site parking for the use, and traffic and transportation impacts have been mitigated to a level of insignificance.

The NBMC requires off-street parking and loading spaces for a residential care facility at a ratio of one space for every three beds. The facility provides a total of six off-street parking spaces; and therefore, would meet the NBMC requirements for off-street parking with the exception of weekend family counseling sessions as discussed below if a use permit were approved with conditions limiting the occupancy to 14 beds.

Newport Coast Recovery conducts regular family counseling sessions on weekends. Familial counseling for non-residents, while being an important part of the recovery of resident clients, can significantly impact on-street parking during busy weekends on the Balboa Peninsula. The use of on-street parking by the facility on weekends impacts the availability of on-street parking for use by residents of the neighborhood.

The Hearing Officer has determined this finding could be made if a use permit were approved with conditions of approval included that would limit the occupancy to 14 beds and require the applicant to: (1) purchase one master parking permit from the City to use for on-street parking by each client who is permitted to drive his personal vehicle to and from the facility; and (2) restrict to the maximum of three the number of clients who reside at 1216 West Balboa who are permitted to have personal vehicles; (3) require that all on-site spaces remain permanently clear and open for parking; (4) require all staff members to use the on-site parking for personal cars and transport vans; and (5) regulate family counseling activities on-site when on-street parking is utilized to Sundays between 9:00 a.m. and 12:00 noon. In the event family counseling occurs during other times of day, the applicant is required to provide on-site parking in a manner that that does not result in placement of resident cars on the street, or provide family members alternative transportation modes to and from the facility.

NBMC §20.91A.060 Finding C: The property and existing structures are physically suited to accommodate the use.

The building is similar to many other residential structures along West Balboa Boulevard constructed on a lot parcel that measures approximately 62 feet wide by 100 feet deep. The building was constructed in 1949 when the subject property was zoned R-3. The property was later rezoned to an R-2 District in 1989 along with other properties in the area. As a result, the structure is nonconforming structure permitted to continue subject to the provisions of Chapter 20.62, "Nonconforming Structures and Uses," of the NBMC.

The Hearing Officer acknowledges that the City of Newport Beach Fire Department is the responsible department for implementing fire protection of all group residential care facilities and residences. The subject property has an approved fire clearance from the City of Newport Beach Fire Department dated June 6, 2004, for a maximum occupancy of 29 residents, as well as staff. Separate from the use permit process, the applicant may be required to conduct an architectural code analysis of the facility to determine if the facility complies with existing current Building Codes for this occupancy type, or the Building Codes existing at the time the facility was initially issued a fire clearance.

NBMC §20.91A.060 Finding E: The operation of buses and vans to transport residents to and from off-site activities does not generate vehicular traffic substantially greater than that normally generated by residential activities in the surrounding area.

A facility van provides transportation for the residents on a weekly schedule dispersed within the day and among the days of the week so that van transportation is not concentrated during peak traffic times. Van loading and unloading occurs at the West Balboa Boulevard frontage that is less congested than the narrower alley access at the rear of the building. The Hearing Officer has determined that this finding could be made if a use permit were approved with a condition of approval included that would restrict the loading and unloading of transportation van passengers to occur within open parking spaces along West Balboa Boulevard and prohibiting van drivers from stopping or double-parking in a traffic lane.

NBMC §20.91A.060 Finding F: Arrangements for delivery of goods are made within the hours that are compatible with and will not adversely affect the peace and quiet of neighboring properties.

Business products and other packages and goods are delivered to the facility's business office located off-site. From this location, goods are delivered by staff members to the facility during weekdays between the hours of 9:00 a.m. to 5:00 p.m. The Hearing Officer finds that these days and hours for deliveries are

consistent with normal working hours and as such are compatible with and will not adversely affect the peace and quiet of neighboring properties.

NBMC §20.91A.060 Finding G: Arrangements for commercial trash collection in excess of usual residential collection are made within hours that are compatible with and will not adversely affect the peace and quiet of neighboring properties.

The applicant contracts with a commercial waste management company which collects trash twice a week on weekdays between the hours of 9:00 a.m. and 5:00 p.m. The Hearing Officer finds that the hours of trash collection are within hours that are compatible with and will not adversely affect the peace and quiet of neighboring properties.

Section 2. That Findings Nos. 1 - 4 of NBMC §20.91.035 (A) cannot be made for the following reasons:

NBMC §20.91.035 (A) Finding No. 1: That the proposed location of the use is in accord with the objectives of this code and the purposes of the district in which the site is located.

The Hearing Officer finds that the proposed project is only partially in accord with the objectives of this code and the purposes of the district in which the site is located. The subject property is located in an R-2 District, and the proposed use as a residential care facility is a nonconforming use. Nonconforming uses in a residential district are subject to the provisions of Chapter 20.91A of the NBMC. The Hearing Officer finds that the proposed application for Use Permit 2008-033 is in accord with the objectives and requirements of Chapter 20.91A with respect to the requirement for the submittal of an application for approval of a use permit to continue the use of the subject property as a residential care facility in the R-2 District.

The objectives of the code include provisions intended to reduce, through the use permit process, the potential for overconcentration of residential care facilities within a neighborhood and to protect public health, safety, peace, morals, comfort, or welfare of persons residing or working in or adjacent to the neighborhood of such use. The Hearing Officer finds that the intensity of the use, if limited to 14 residents housed in nine bedrooms within the seven dwelling units with two persons maximum per bedroom, would be consistent with a typical residential population factor of two persons per dwelling unit in the R-2 District and the surrounding properties within the R-2 District.

However, the Hearing Officer finds that the subject property's proximity to another residential care facility at 1132 West Balboa Boulevard, to a large state-

licensed day care facility at 1400 West Balboa Boulevard, to Newport Elementary School, and to facilities either selling or serving alcoholic beverages makes the proposed use incompatible with the surrounding residential character of the neighborhood. The discussion of incompatibility of the proposed use with the surrounding residential neighborhood is discussed in detail in Section 3, Finding D of NBMC §20.91A.060, of this resolution.

The Hearing Officer has determined that the proposed location of the use is not in accord with all of the objectives of this code and the purposes of the district in which the site is located due to the proximity of the proposed use to another residential care facility at 1132 West Balboa Boulevard, to Newport Elementary School, to the large state-licensed day care facility, and to alcoholic beverage sales and service facilities; and therefore, this finding cannot be made.

NBMC §20.91.035 (A) Finding No. 2: That the proposed location of the use permit and the proposed conditions under which it would be operated or maintained will be consistent with the General Plan and the purpose of the district in which the site is located; will not be detrimental to the public health, safety, peace, morals, comfort, or welfare of persons residing or working in or adjacent to the neighborhood of such use; and will not be detrimental to the properties or improvements in the vicinity or to the general welfare of the city.

General Plan policy LU 6.2.7 directs the City to regulate day care and residential care facilities to the maximum extent allowed by federal and state law so as to minimize impacts on residential neighborhoods. If a use permit were approved to allow the continued operations of the facility, conditions of approval would be imposed regulating the use and operational characteristics related to limits on the number of resident clients, curfew hours, smoking, transportation of clients off-site, trash collection, delivery of goods, and types of services provided. However, the Hearing Officer finds that the continued use of the subject property as a residential care facility in this location would be detrimental to the public health, safety, peace, morals, comfort, or welfare of persons residing or working in or adjacent to the facility.

Testimony by an adjacent neighbor and other area residents includes statements that residents of this facility have been disrespectful to others in the neighborhood, including playing music loudly despite frequent requests not to do so, littering, using profanity, and allowing excessive secondhand smoke to permeate adjacent residences. From this testimony, it does not appear to the Hearing Officer that the operator can adequately control the facility's caseload of clients in a manner that allows the neighbors to have quiet enjoyment of their properties.

The subject property is proximate (within 300 feet) to Newport Elementary School located at 1327 West Balboa Boulevard and proximate (within 750 feet) to Christ Church by the Sea's Children's Center, a large day care facility licensed by the State of California Department of Social Services located at 1400 West Balboa Boulevard with a capacity of 44 children. The Hearing Officer finds that these facilities could be affected by the use due to residents of Newport Coast Recovery using the open recreational area associated with Newport Elementary School and the potential for residents of Newport Coast Recovery to loiter, smoke, and engage in offensive and disruptive behaviors incompatible with nearby school and daycare uses.

NBMC §20.91.035 (A) Finding No. 3: That the proposed use will comply with the provisions of this code, including any specific condition required for the proposed use in the district in which it would be located.

The Hearing Officer finds that the facility would not comply with the operational standards specified in NBMC §20.91A.050, as outlined in Finding A of NBMC §20.91A.060 and as described in Section 3 below.

NBMC §20.91.035 (A) Finding No. 4: If the use is proposed within a Residential District (Chapter 20.10) or in an area where residential uses are provided for in Planned Community Districts or Specific Plan Districts, the use is consistent with the purposes specified in Chapter 20.91A and conforms to all requirements of that Chapter.

The Hearing Officer finds that this proposed project is only partially consistent with the purposes specified in Chapter 20.91A and does not conform to all the requirements of that Chapter. The subject property is located in an R-2 District, and the proposed use as a residential care facility is a nonconforming use. Nonconforming uses in a residential district are subject to the provisions of Chapter 20.91A of the NBMC. The proposed application for Use Permit No. 2008-033 is in accord with the purpose and requirements of Chapter 20.91A with respect to the requirement for the submittal of an application for approval of a use permit to continue the use of the subject property as a residential care facility in the R-2 District.

The intended purpose of the code is to maintain the residential character of the neighborhood within which a facility is located, to reduce the potential for overconcentration of residential care facilities within a neighborhood, and to protect public health, safety, peace, morals, comfort, or welfare of persons residing or working in or adjacent to the neighborhood of such use. The Hearing Officer finds that the placement of more than one residential care facility per median block length in the densely populated mid-Balboa Peninsula area creates a strong likelihood of change to the character of the residential neighborhood and

would result in an overconcentration of residential care facilities within the neighborhood.

The Hearing Officer has determined it is appropriate to apply the American Planning Association standard to this application. The use is located in the mid-Balboa Peninsula area which is a part of the Nonstandard Subdivision Area. Inasmuch as NBMC §20.91A.060 (D.3.) indicates median block lengths in different areas of Newport Beach widely range from 300 feet in the nonstandard subdivision areas to as much as 1,422 feet in standard subdivision areas, the Hearing Officer may establish a block length for the mid-Balboa Peninsula area where this use is located. The calculable median block length of 617 feet is hereby established for purposes of the mid-Balboa Peninsula area. The term "block" means an area bounded by streets, per Ordinance No. 2008-05 (per NBMC §20.03.030 "Definitions"). In this case, Balboa Boulevard is a major street that is a sufficient dividing line between each side of Balboa Boulevard. However, the Hearing Officer can extend beyond smaller streets like 12th and 11th Streets in an effort to "eliminate the differences in block lengths" per NBMC §20.91A.060 (D.3.) to achieve a 617-foot block standard.

Within the 617-foot block where the proposed use is located there is already one 11 bed residential care facility (Balboa Horizons). The proposed use located at 1216 West Balboa Boulevard, within the same block as Balboa Horizons, would result in an overconcentration of residential care facilities within the neighborhood.

The Hearing Officer has determined that the subject property's proximity to another residential care facility at 1132 West Balboa, to a large state-licensed day care facility at 1400 West Balboa, to Newport Elementary School, and to facilities either selling or serving alcoholic beverages makes the proposed use incompatible with the surrounding residential character of the neighborhood. The discussion of incompatibility of the proposed use with the surrounding residential neighborhood is discussed in detail in Section 3 of this Resolution. The proposed location of the use is only partially consistent with the purpose of the code and does not conform to all the requirements of NBMC §20.91A; and therefore, this finding cannot be made.

Section 3. That Findings A and D of NBMC §20.91A.060 cannot be made for the following reasons:

NBMC §20.91A.060 Finding A: The use conforms to all applicable provisions of NBMC §20.91A.050. These development and operational standards are summarized as follows:

1. No secondhand smoke can be detectable outside the property.

The facility's current operational regulations restrict smoking to designated areas within a courtyard area of the facility. The courtyard area is enclosed on all sides by walls but is open to the sky. Smoking outside of the limits of the enclosed courtyard area is prohibited. However, an adjacent neighbor and other area residents provided testimony indicating that excessive secondhand smoke has been detected outside the property. Therefore, the Hearing Officers finds this operational standard cannot be met.

2. **Operations of the facility must comply with state and local law, and the submitted management plan, including any modifications required by this Use Permit. Each plan shall provide a contact name and number to the City.**

   The Hearing Officer finds that the operations of this facility are not in compliance with state law because on two occasions the operator has admitted persons under the age of 18 years to the facility for treatment. These were violations of state law because Newport Coast Recovery does not hold a license from the California Department of Social Services to house minors. This also violates the facility's state ADP license terms because the operator did not hold an "adolescent waiver" that allows treatment of minors at the Newport Coast Recovery facility. This determination is based upon the evidence provided in the Newport Beach Police Department Employees Report dated March 31, 2009; the testimony of Mrs. Christina Willis on July 7, 2009; and the Notice of Operation in Violation of Law with attached material dated April 1, 2009 from the State of California Department of Social Services (DSS) issued to the applicant.

3. **In order to ensure that unlicensed residential care facilities operate in a manner consistent with state and federal law and established industry standards and to ensure that operators do not have a pattern or practice of operating similar facilities in violation of state or local law, no services requiring a license can be provided if the facility does not have a license for those services.**

   The residential care facility is licensed by the State of California Department of Drug and Alcohol Programs (ADP), and the operation plan for the facility provides that only those services permitted by the facility's ADP license are performed within the facility. According to information provided in the application documentation, the owners and managers of the facility do not own or operate any other similar facility in the City of Newport Beach or the State of California. Although neighbors of the facility submitted evidence that the same operator managed an unlicensed adult recovery maintenance

facility at 1219 West Balboa Boulevard for a period of time, the City is not aware that this facility was operated in violation of the law.

4. **There shall be no more than two persons per bedroom plus one additional resident, unless a greater occupancy is requested and granted. Occupancy must also comply with State licensing if applicable.**

   The facility is licensed for a maximum occupancy of 29 residents. The facility is comprised of seven dwelling units and contains nine bedrooms currently occupied by two persons per bedroom for a total of 18 residents. The Hearing Officer finds this occupancy is consistent with the residential occupancy design of the building and the occupancy standards of NBMC §20.91A.050.

5. **If certification from an entity other than ADP's licensing program is available, applicants must get that certification.**

   If a use permit had been approved for the facility to continue operations, a condition of approval would have been included requiring the applicant to consider the merits of additional certification available to it, including but not limited to an Orange County Adult Alcohol and Drug Sober Living certification.

6. **All individuals and entities involved in the facility's operation and ownership must be disclosed.**

   All employees and management personnel have been disclosed in the application documentation.

7. **No owner or manager shall have any demonstrated pattern of operating similar facilities in violation of the law.**

   According to information provided in the application documentation, the owners and managers of the facility do not own or operate any other similar facility in the City of Newport Beach or in the State of California. While residents submitted evidence that the same operator managed an unlicensed adult recovery maintenance facility at 1219 West Balboa Boulevard for a period of time, the City is not aware that this facility, which did not provide treatment onsite, was operated in violation of the law.

   The facility's State of California ADP license is valid until January 31, 2010. Based on the newly acquired evidence, as described above in item 2, the Hearing Officer finds that the Newport Coast Recovery facility did not operate in compliance with the terms of the state ADP license issued to the applicant because the operator admitted minors to the facility for treatment without the

required adolescent waiver, and without a license from the Department of Social Services.

NBMC §20.91A.060 Finding D: The use will be compatible with the character of the surrounding neighborhood, and the addition or continued maintenance of the use will not contribute to changing the residential character of the neighborhood, such as creating an overconcentration of residential care uses in the vicinity of the proposed use. In making this finding or sustaining such a finding, the Hearing Officer shall consider, as appropriate, the following factors:

1. **The proximity of the use location to schools, parks, other residential care facilities, outlets for alcoholic beverages and any other uses which could be affected by or affect the operation of the subject use;**

2. **The existence of substandard physical characteristics of the area in which the use is located such as lot widths, setbacks, narrow streets, limited available parking, short blocks, and other substandard characteristics which are pervasive in certain areas of the City of Newport Beach, including portions of West Newport, Lido Isle, Balboa Peninsula, Balboa Island, Corona del Mar and Newport Heights, which portions were depicted on a map referred to as the Nonstandard Subdivision Area presented to the Newport Beach Planning Commission on September 20, 2007 and on file with the Director of Planning; and**

3. **Whether, in light of the factors applied in subsection 20.91A.D.1 and D.2, it would be appropriate to apply the American Planning Association standard of permitting one or two such uses per block. Median block lengths in different areas of Newport Beach widely range from 300 feet in the Nonstandard Subdivision Areas to as much as 1,422 feet in standard subdivision areas. The average calculable block length in much of the standard subdivision areas is 711 feet and the calculable median block length is 617 feet. The Hearing Officer shall apply the American Planning Association standard in all areas of Newport Beach in a manner that eliminates the differences in block lengths. In making this determination, the hearing officer shall be guided by average or median block lengths in standard subdivisions of the City. The Hearing Officer shall retain the discretion to apply any degree of separation of uses, which he or she deems appropriate in any given case. A copy of the American Planning Association standard is on file with the Director of Planning.**

The subject property is proximate (within 300 feet) to Newport Elementary School located at 1327 West Balboa Boulevard, and proximate (within 750 feet) to Christ Church by the Sea's Children's Center, a large day care facility licensed by the State of California Department of Social Services located at 1400 West Balboa Boulevard with a capacity of 44 children. The Hearing Officer finds that these facilities could be affected by the use due to residents of Newport Coast Recovery using the open recreational area associated with Newport Elementary School and the potential for residents of Newport Coast Recovery to loiter, smoke, and frequently engage in offensive and disruptive behaviors incompatible with nearby school and daycare uses.

The subject property is proximate (within 1250 feet) to two outlets for alcoholic beverages (American Legion Hall at 215 15th Street and Fry's Market at 115 15th Street) both within walking distance from the facility which allows residents of the use convenient access to alcohol sales and service which could affect the ability of the use to fully operate as an alcohol rehabilitation facility.

The subject property is within the Nonstandard Subdivision Area, an area which is characterized by narrow lot widths, small setbacks, narrow streets, limited available on-street and off-street parking, and short blocks. Noise associated with the operation of the use, including music and shouting, is audible to adjacent properties.

The Hearing Officer has determined it is appropriate to apply the American Planning Association standard to this application. The use is located in the mid-Balboa Peninsula area which is a part of the Nonstandard Subdivision Area. Inasmuch as NBCM §20.91A 060 (D.3.) indicates median block lengths in different areas of Newport Beach widely range from 300 feet in the nonstandard subdivision areas to as much as 1,422 feet in standard subdivision areas, the Hearing Officer has the authority to establish a block length for the mid-Balboa Peninsula area where this use is located, and has established the calculable median block length of 617 feet for the mid-Balboa Peninsula area. The term "block" means an area bounded by streets, per Ordinance No. 2008-05 (NBMC §20.03.030 "Definitions"). In this case, the Hearing Officer finds that Balboa Boulevard is a major street that is a sufficient dividing line between blocks on each side of Balboa Boulevard. However, the Hearing Officer can and has extended beyond smaller streets like 12th and 11th Streets in an effort to "eliminate the differences in block lengths" per NBMC §20.91A.060 (D.3) to achieve a 617-foot standard.

The Hearing Officer has determined that the placement of more than one residential care facility per median block length in the densely populated mid-Balboa Peninsula area creates a strong likelihood of change to the character of

the residential neighborhood. Within the 617-foot block where this use is located there is already one 11 bed residential care facility (Balboa Horizons).

Section 5. The Hearing Officer hereby denies with prejudice Use Permit No. 2008-033. This supplemental resolution shall supersede Resolution No. HO-2009-001.

Section 6. The action shall become final and effective fourteen (14) days after the adoption of this Resolution unless within such time an appeal is filed with the City Clerk in accordance with the provisions of Title 20, Planning and Zoning, of the Newport Beach Municipal Code.

PASSED, APPROVED, AND ADOPTED this 17th DAY OF SEPTEMBER 2009.

By: _____
Thomas W. Allen, Hearing Officer

ATTEST:

_____
City Clerk