

Minutes
Clayton Planning Commission Meeting
Tuesday, May 22, 2018

1. CALL TO ORDER, ROLL CALL, PLEDGE TO THE FLAG

Chair Carl Wolfe called the meeting to order at 7:00 p.m. at Hoyer Hall, 6125 Clayton Road, Clayton, California.

Present: Chair Carl Wolfe
Vice Chair Bassam Altwal
Commissioner Peter Cloven
Commissioner William Gall

Absent: Commissioner A. J. Chippero

Staff: Community Development Director Mindy Gentry
Assistant Planner Milan Sikela, Jr.

2. ADMINISTRATIVE

- 2.a. Review of agenda items.
- 2.b. Declaration of Conflict of Interest.
- 2.c. Chair Carl Wolfe to report at the City Council meeting of June 5, 2018.

3. PUBLIC COMMENT

None.

4. MINUTES

- 4.a. Approval of the minutes for the April 24, 2018 Planning Commission meeting.

Commissioner Gall moved and Commissioner Cloven seconded a motion to approve the minutes, as submitted. The motion passed 4-0.

5. PUBLIC HEARINGS

- 5.a. **ZOA-02-18, Municipal Code Amendment, City of Clayton.** A request by the City for the Planning Commission to consider and make a recommendation to the City Council regarding amendments to the Clayton Municipal Code Section 17.92 (Inclusionary Housing Requirements) to incorporate rental housing projects.

Director Gentry presented the staff report.

Vice Chair Altwal inquired what is the in-lieu contribution?

Director Gentry responded that the adopted Clayton General Plan Housing Element requires that projects with 10 or more units shall provide 10% of those units as affordable housing units. The City Council will be reviewing and taking formal action on a resolution in order to address the ratio of what percentage of those units would be low income units and what percentage would be very low income units.

Commissioner Cloven inquired if a developer decides to pay the affordable housing in-lieu fee instead of providing the units, how is the in-lieu fee managed?

Director Gentry responded that it would be up to the discretion of the City Council to accept the payment of an in-lieu fee rather than requiring the provision of units on-site or some other alternative mechanism. The way that the affordable housing requirements are currently written, the in-lieu fee would go into a fund specifically established for the provision of affordable housing.

Commissioner Cloven inquired about how many affordable housing units were provided toward our Regional Housing Needs Assessment (RHNA) as part of the Diamond Terrace project?

Director Gentry responded that the Diamond Terrace project was constructed so long ago, it is unclear whether RHNA numbers were counted back then. The RHNA numbers we use today are only applicable to current development.

Commissioner Cloven inquired if the same controls apply to rental projects as would apply to homeownership units such as a condominium or townhouse?

Director Gentry responded that a deed restriction would be in place requiring those units to be set aside for a certain area median income level.

The public hearing was opened.

Jason Reyes, representative of the Grand Oak project, requested that the Planning Commission exempt Residential Care Facilities for the Elderly (RCFE) from the requirements of Assembly Bill (AB) 1505.

The public hearing was closed.

Commissioner Cloven indicated the following:

- The RHNA requirements are quite clear on how the City needs to comply with State housing requirements.
- We would be hurting ourselves by not recommending approval of the Ordinance to include rental units in order for the City to be compliant with the RHNA and State housing requirements.
- Low income housing does not necessarily mean Section 8; it means teachers who teach at local schools but cannot afford to live in Clayton.

Commissioner Gall concurred with Commissioner Cloven's comments.

Vice Chair Altwal concurred with Commissioner Cloven's comments and inquired if the Planning Commission could require a certain percentage of the units of the Grand Oak project be as affordable as low income households?

Director Gentry responded that the issue arises when you could have the base rent be affordable but, as needed services incrementally increased such as medication administration, bathing, and incontinent care, it creates a difficult scenario where a tenant would be forced out because the tenant cannot afford the services as a result of needing a higher level of care. That is the operational dilemma that Mr. Reyes, representative of the Grand Oaks project, is concerned about.

Vice Chair Altwal indicated that, since it is a State and RHNA requirement, he agrees that the Planning Commission recommend approval of the Ordinance.

Commissioner Cloven indicated that Mr. Reyes asked for an exemption for RCFEs; has there been this type of exemption granted for RCFEs in other jurisdictions.

Director Gentry responded that AB 1505 is so new that there is no information available on how this issue has been handled in other jurisdictions. As the Commissioners are aware, the Planning Commission is only making a recommendation to the City Council with the City Council ultimately making the final decision.

Commissioner Cloven indicated that he supports recommending City Council approval of the Ordinance as written.

The public hearing was re-opened.

Marci Longchamps inquired why does Clayton have to be the first jurisdiction to implement these requirements?

Director Gentry responded that, in 2016, the City Council directed staff to draft inclusionary housing requirements in order to be compliant with the City's Housing Element. The City's Housing Element has to be certified and adopted by the State which, as part of the State's certification and adoption, the State mandates certain requirements and legislative measures that the City has to comply with, including inclusionary housing requirements. If the City fails to meet the inclusionary housing requirements that are outlined in the goals and implementation measures within the City's Housing Element, the State could rescind the certification and adoption. Without a certified and adopted Housing Element, it could result in a multitude of different lawsuits against the City.

Ms. Longchamps inquired how many cities in Contra Costa County are passing these types of regulations that are similar to this Ordinance?

Director Gentry indicated that, numerous cities throughout California have inclusionary housing ordinances and each jurisdiction will be choosing to update their regulations as they see fit in compliance with AB 1505.

James Gamble indicated the following:

- This ordinance is part of Agenda 21.
- Look at other communities in the area where high density housing is being developed around heavy transit areas.

James Jacques indicated that he disagreed with the representative of the Grand Oaks project asking for RCFEs to be exempt from the requirements of AB 1505.

The public hearing was closed.

Commissioner Cloven moved and Vice Chair Altwal seconded a motion to adopt Resolution No. 02-18, recommending City Council approval of an Ordinance amending the City's Inclusionary Housing Requirements. The motion passed 4-0.

- 5.b. ZOA-08-16, Municipal Code Amendment, City of Clayton.** A request by the City for the Planning Commission to consider and make a recommendation to the City Council regarding amendments to the Clayton Municipal Code to conditionally allow parolee homes in the following General Plan land use designations: Multifamily Low Density, Multifamily Medium Density, and Multifamily High Density.

Director Gentry presented the staff report.

Commissioner Gall inquired what would happen after the City's parolee home moratorium expires on October 3, 2018?

Director Gentry responded that, after the parolee home moratorium expires on October 3, 2018, there would be no codified requirements established in the City's Municipal Code to regulate parolee homes which would allow parolee homes to potentially be located anywhere in Clayton.

Commissioner Cloven had the following questions:

- So the City could possibly be in legal jeopardy if we established a ban on parolee homes? Director Gentry responded "yes."
- So it is in our best interest to establish codified provisions which regulate parolee homes? Director Gentry responded "yes" and added that the City cannot establish regulations that are so prohibitive that, by default, it prevents these types of uses from locating Clayton.
- Is my understanding correct that the parolee homes would still have to be reviewed individually before the Planning Commission on a case-by-case basis under the guise of a use permit? Director Gentry responded "yes."
- In the instance that we were to review a use permit for a parolee home, what latitude do we have to require certain thing like a management plan? A management plan is one of the requirements in the draft Ordinance.
- Could we require that there be a person living at the parolee home for supervisory purposes who is not a parolee? That is one possibility that could be considered on a case-by-case basis and included as a condition of approval.

- Are there a maximum number of parolees that can live in a parolee home based on the number bedrooms in that home? Due to a court case out of Southern California, the number of parolees would be dictated by the California Building Code which may include, but not be limited to, such calculations as number of occupants per bedroom and number of occupants on a square footage basis in the rest of the home.
- According to the provisions of the draft Ordinance, in a three-bedroom townhouse theoretically six parolees could live there? Director Gentry responded that was correct.
- If a use permit were conditionally approved for a parolee home, is there a way the City could review the parolee home on an annual basis? Director Gentry responded that could be included as a condition of approval.
- Is there a fee the City could charge to cover the cost of policing and annual reviews? Director Gentry responded that, beyond costs for staff time in the processing of the use permit and follow-up annual inspections as directed by the use permit conditions of approval, the City would not be able to charge for additional calls for service or strain on the police department because those types of things are already assumed in the property taxes.
- What are single housekeeping units? Director Gentry responded that an example of single housekeeping units would be where a parolee owns a living unit and invites a friend who is a parolee to live in the home. The regulation of these types of households could tread into questionable legal territory in regards to what defines a housing unit and how the government wants to define family.
- So, theoretically, a single family dwelling unit could be considered as a single housekeeping unit? Director Gentry indicated that was correct and, in addition, a multifamily dwelling unit could also be considered as a single housekeeping unit.
- Of the rules and criteria related to parolee housing, one item was that membership is determined by the residents of the parolee home and not by a management company so, if the residents were all parolees, they could choose which parolee could live with them in the parolee home, correct? Director Gentry responded that was correct.

Vice Chair Altwal had the following questions:

- Is the City being required by the State to pass this Ordinance? Director Gentry responded that the City is not being required by the State to pass this Ordinance. Rather, this is a preemptive recommendation of staff and in response to AB 109 in order to prevent parolee homes from locating anywhere in Clayton and to allow the City some control over where they are located.
- If the City does not pass this Ordinance, the parolee home could locate anywhere in the Clayton that they want to and we would not have any control over the parolee home? Director Gentry indicated that was correct as the parolee home would then be considered as a typical residential unit and the parolee home could locate anywhere in Clayton without any regulations and without any public hearings process, resulting in the City relinquishing all control over parolee homes.

- Only federal crime parolees can live in the parolee home? Director Gentry responded that all parolees would be allowed to live in the parolee home, based on the definition of a parolee as contained in the draft Ordinance that has a large umbrella definition that encompasses essentially anyone that is on parole.
- Can the City limit the type of parolees living in the parolee home, for instance prohibiting sex offender parolees as opposed to petty theft parolees? Director Gentry responded that she would defer to legal counsel, Heather Lee, a representative from the City Attorney's Office.

Ms. Lee responded that the City prohibiting a particular class of people would run the risk of legal challenge and could result in the ensuing court case being a test case for this issue.

Director Gentry indicated that this draft Ordinance is an attempt by staff to be proactive as a result of the City receiving an inquiry regarding this issue. So, rather than allowing parolee homes to locate within Clayton without the community's consideration, the intent of the draft Ordinance is that, in the instance that there is a County program seeking to locate a parole home in Clayton, then at least the City would have a say in where the parolee home is located, how the parolee home can operate, and ensuring that the parolee home is subject to a public hearing process. Staff is hoping that the draft Ordinance will be preemptive and will enable the City to have control over where parolees get housed and how they get housed.

Vice Chair Altwal had the following questions:

- How would this Ordinance stop a parolee home from being located anywhere in Clayton? Director Gentry responded that the Ordinance would prevent a County re-entry program contractor from renting a home without a public hearing and without being subject to location controls; however, the Ordinance would not prevent a situation where someone owns a home and invites family members or friends who are parolees to move into the home.
- Regarding the radius area around a parolee home, can we increase the unit of radius area measurement from a foot to a yard? Director Gentry indicated that, increasing the buffer area from feet to yards would raise the legal questionability of the Ordinance as this would affect the numbers of possible parolee home locations available in Clayton. Legal counsel has indicated a minimum of three to four available locations would be legally defensible and increasing the unit of measurement would reduce the number of locations available and would, by exclusion, essentially be a Citywide ban of parolee homes.
- So a ban on parolee homes constitutes discrimination? Director Gentry said that was correct.

Chair Wolfe inquired what would happen if the City established a ban on parolee homes? Director Gentry responded that, if the City banned parolee homes, it would open the City up to discrimination lawsuits.

Commissioner Gall inquired that, if a parolee has family living in Clayton, could they just move into the family home? Director Gentry explained that this Ordinance would address parolee homes that would be established as part of the County's re-entry program.

The public hearing was opened.

Mike Clifton indicated the following:

- Clayton is too small to manage parolee homes.
- Catering to parolees is not in the City's best interest.
- Allowing them to use multifamily units, which, are more affordable, make Clayton more attractive to parolees.
- We should only allow them to use single-family residential housing units, which are more expensive, and may be a way to discourage parolee homes from locating within Clayton.
- This Ordinance makes it appear to the County that we are inviting parolees to move to Clayton.

Chair Wolfe had the following comment and question:

- It would appear that if the City does not pass some sort of regulations, we would be in a difficult situation.
- What do we know about the number of parolees in Clayton? Director Gentry indicated that, according to County statistics which take into consideration the entire zip code of 94517 which is a much larger area than the City of Clayton, there are 20 parolees who consist of 9 adults and 11 juveniles.

Sarah Riley indicated the following:

- I have been a police officer in Oakland for 16 years.
- I moved out to Brentwood to avoid running into parolees who were people I arrested in a grocery store.
- I then moved to Clayton to get out of Brentwood and after Brentwood allowed parolees to move in, then my home was burglarized.
- These parolees are arrested for violent offenses and then, when they moved into parolee homes, their offenses are represented as something more benign than they actually area.

James Jacques indicated the following:

- I am also a police officer.
- Clayton is very attractive since it is a safe community.
- Children in Clayton commonly walk home from school. As a result, the 300-foot radius is not a large enough distance to provide safety for our children.
- We should not only be concerned with one parolee, but instead we should be concerned with a whole group of parolees living together. Birds of a feather flock together, so we want to avoid inviting a criminal element into Clayton where whole groups of parolees are living together.
- The City should do nothing right now, and wait for the lawsuit to come.

Vice Chair Altwal confirmed that, if the City does nothing, it is not the lawsuit that concerns us but rather the fact that parolee homes could be potentially located anywhere in Clayton, correct? Director Gentry indicated that was correct.

Colleen Van Outrive indicated the following:

- What has stopped parolee homes from coming into Clayton thus far?
- Clayton is only 5 square miles in area. Allowing 6 parolee homes in Clayton would be an average of more than one parolee home per square mile.
- I ask that the Planning Commission make it as difficult as possible for parolee homes to move into Clayton.

Chair Wolfe inquired if the email the City received regarding parolee homes was sent just to the City of Clayton. Director Gentry responded that the email was sent out to many more jurisdictions than just Clayton. As a result of the email, staff thought it prudent to establish some sort of regulations in order to make it more restrictive for parolee homes to locate within Clayton. This arose from the County re-entry program, which was established by the County in October 2011 due to the United States Supreme Court upholding the State of California Court ruling mandating that California reduce its prison population.

Chair Altwal inquired if the City can extend the moratorium beyond the expiration date in October 2018? Director Gentry responded that, no the City cannot extend the moratorium more than three times, and the City's third extension will expire in October 2018.

Commissioner Cloven asked if any other cities in the County have parolee home regulations? Director Gentry responded that Pleasant Hill, Antioch, and Oakley have established regulations for parolee homes.

Chair Wolfe inquired if there is a legal notification system for a parolee being released into our community? Director Gentry responded that there currently is no legal notification system.

Kathy Bengel indicated the following:

- She is opposed to the draft Ordinance.
- Her neighbor could not make it to the meeting tonight and her neighbor wanted to pass along her concerns related to an increase in crime that may occur as a result of parolee homes being established in Clayton.
- Could we locate a parolee home out on Marsh Creek Road?

Director Gentry indicated that the Marsh Creek Road area is located in the unincorporated Contra Costa County area, outside of Clayton, and would be under the County's jurisdiction.

Matt Foley indicated the following:

- Been in law enforcement for 15 years.
- To respond to Commissioner Cloven's comment about school teachers living in affordable housing units, I have met many occupants of Section 8 houses and, not once, have I met a school teacher living in them.
- The City is not being exclusionary since parolees can already locate within the City.

- Governor Jerry Brown has a parolee release rate of 87% for parolees that have committed serious crimes, in some case these parolees are lifers. In the past these criminals would not have been released. To compare, former Governor Arnold Schwarzenegger only had a parolee release rate of 27%.
- These parolee are cloaked are lesser offenders when in fact they are animals that have committed serious crimes.
- The City should establish another level of approval so the County cannot so easily establish these types of homes within Clayton.
- Would a business license be required for a parolee homes.

Director Gentry responded with the following comments:

- The radius distances for buffering purposes were proposed by City staff to prevent parolee homes from establishing near schools, parks, and other sensitive-use areas.
- The purpose of this Ordinance is to establish another level of approval that would give the community the opportunity to review parolee homes and provide feedback to the Planning Commission regarding whether or not the use is acceptable in the location it is proposed.
- Yes, the parolee home would be required to obtain a City business license.

Chair Wolfe asked what the City Attorney's office thinks of possible legal challenges staff's proposed buffer zones? Ms. Lee responded that staff has worked with legal counsel to develop a defensible way of identifying buffers and an appropriate number of locations to provide a reasonable set of regulations that could be legally defensible.

Maria Arvizu indicated the following:

- This is our community and we should be able to dictate what does and does not happen here.
- We should establish something like Megan's Law.
- We should be able to list parolees in a database who are moving to Clayton and have their pictures and the crimes they committed.
- Parolee homes should not be located in Clayton.
- A curfew should be placed on parolees living in Clayton.

Vice Chair Altwal inquired if there is a way to establish a curfew for parolees living in Clayton? Ms. Lee responded that, as with any land use regulation, we have to have a rational, legal basis for establishing a curfew which we may not have the authority to do given the State's laws superseding our own. We are talking about land use regulations and restrictions on property use. Some of these parolee home-related concerns are a police matter and do not fall under the purview of the Planning Commission.

Brain Fitzgerald indicated that the City should have each parolee home apply on a case-by-case basis which would allow us to deny the parolee home.

Commissioner Cloven inquired what are the Planning Commission's options regarding the requirements of a land use permit? Director Gentry responded that the Planning Commission would review any possible impacts to the surrounding community as it pertains to public health and safety and, based on that analysis, the Planning Commission would have to make certain findings in order to deny a use permit. The Planning Commission would, as part of the use permit process, have the ability to regulate hours of operation, parking, traffic, and other such typical land use considerations that would be associated with a proposed development.

Commissioner Cloven indicated that it is incumbent upon us to be as restrictive as possible in order to protect the safety of our community.

Director Gentry indicated that staff's discussion with legal counsel included creating a set of regulations in the Municipal Code that would be as restrictive as possible but still be within the confines of the law.

Fiona Hughes indicated the following:

- Since the email was sent to other jurisdictions, it would seem like the sender of the email is fishing for easy communities to establish parolee homes in.
- We should respond to the sender of the email that Clayton is not a viable location for parolee homes.
- We do not want to end up flagging our City as a parolee destination.

Director Gentry indicated that the sender of the email has not expressed further interest in locating parolee homes in Clayton.

Vice Chair Altwal inquired if the City's business license process would be another way to regulate parolee homes? Director Gentry indicated that the City's business license process is merely a taxation mechanism and would not be an option for regulating parolee homes.

Kristin Moore indicated the following:

- Only three communities in Contra Costa County have mandated zones for parolees.
- All the other communities in Contra Costa County have not taken a stance on parolee homes, so why should we?
- There are four locations identified for parolee homes in Clayton that are in close proximity to our schools.
- It is as if we are putting a target on our back and our children's backs to invite parolees into town.
- It is mind boggling that we are even considering this.

David Thys indicated the following:

- I have spent a career in law enforcement.
- I understand where the City is coming from regarding legal challenges.
- I think the citizens of Clayton would welcome a challenge.

Chair Wolfe asked what the City of Antioch has established as a buffer zone for parolee homes? Director Gentry responded that the City of Antioch would not be applicable in this case since they have required that parolee homes be located in industrial districts and there are no industrial districts in Clayton.

Paul Henshaw expressed concerns that the buffer zone around a parolee home could prohibit the establishment of a pre-school.

Catherine Harrell indicated the following:

- Part of why we live in Clayton is because we have a safe community.
- I disagree with parolee homes being located within 300 feet of schools. We should increase the buffer distance.
- We should not put parolee rights above the safety of our children. Our children should come first.

Marci Longchamps indicated that we should not be one of the first cities to participate in this program.

John Kranci indicated the following:

- I am a retired police officer.
- I support increasing the buffer distance.

Chair Wolfe inquired what would a legal challenge cost the City? Director Gentry said, depending on the nature of the lawsuit, the fiscal impact could range from the tens of thousands to the hundreds of thousands.

James Gamble indicated the following:

- This item should not be on the agenda.
- What is attractive about establishing parolee homes in Clayton when Concord has many other zoning options such as industrial districts.
- This is a social justice entity pushing for parolee homes.

Wendy Laughlin indicated the following:

- Parolee homes would impact in-home day cares which are needed.
- It is a privilege to live in Clayton.
- It is not fair that parents have to work hard to afford their homes in Clayton while parolees can just move in easily.

Alisa Bowron indicated that she is in opposition to the draft Ordinance since the City Council will not have a level of control over parolee homes.

Director Gentry indicated that, without the establishment of an Ordinance, parolee homes could potentially locate anywhere whereas, with the establishment of an Ordinance, the City would have control over the location of parolee homes, have the ability to regulate them, and subject them to a public hearing process.

Maria Arvizu, representing her husband Victor Arvizu, indicated that parolees moving to Clayton should be subject to some sort of registration process.

Director Gentry indicated that, currently, an individual who is a parolee could theoretically be located anywhere in Clayton. Alternatively, the Ordinance would specifically address the County's re-entry program.

Chuck Blazer indicated the following:

- Staff is way off base with this Ordinance.
- I have seen parolee homes destroy neighborhoods.
- I have concerns with parolee homes contributing to prostitution, drugs, theft, and other crimes.
- We do not want parolees looking at Clayton as an option for moving into.
- Parolee homes increase violence, blight, and crime in general.
- You have heard from your citizens tonight and you should not be making a decision tonight.

Tom Finnegan indicated the following:

- I think the City should not reply to the email.
- I am in favor of an Ordinance that would double or triple the buffer zone distances and make it next to impossible for parolee homes to move to Clayton.
- We should analyze the impacts parolee homes have as a public nuisance that could lower property values and make them build-only proposals.

Vice Chair Altwal inquired about requiring parolee homes being allowed as build-only projects? Director Gentry responded that requiring parolee homes to be build-only projects would make the parolee homes so cost prohibitive that the City would legally default to being too restrictive.

Frank Gavidia indicated the following:

- We live in a State that ignores the Federal government; why should we cater to the State?
- I do not understand how one email triggered all this staff time and work in preparing the draft Ordinance.
- We should have input from our Police Department.

Ryan (no last name given) indicated the following:

- I love this community.
- I am a police officer and have seen parolee homes destroy communities.
- I would like to know who sent the email.
- We should table this item until we have more information.

Director Gentry indicated that the email is public record and was sent from a program manager representing a transitional housing/stable living environment for persons previously incarcerated and the program manager was looking for jurisdictions to locate in that did not have a use permit process already established.

The public hearing was closed.

Vice Chair Altwal indicated the following:

- I want to thank staff for all their hard work and bringing this item to our attention.
- My home in Clayton was burglarized 6 years ago.

- We should not make a decision tonight.
- We should not regulate it until a parolee home attempts to move into Clayton and then we are forced to regulate it.

Commissioner Gall indicated the following:

- I want to thank everyone for being here this evening and would like to express to the audience that their concerns are Planning Commission concerns as we are also members of this community and we have children and grandchildren.
- We have an obligation to the City Council to make a recommendation.
- We have some time so we should take a closer look at this issue.
- I do not think we should recommend approval right now.

Commissioner Cloven indicated the following:

- I see a need to do something.
- I would not want a parolee home locating next door to my residence and not be able to do anything about it.
- I think it would be good for the City to be able to review a land use permit for a parolee home and have codified regulations that would require the submittal of plans and a management plan.
- I am concerned that we are inviting parolee homes to Clayton but I am also concerned that, without regulations, parolee homes can locate anywhere in our community.
- I think the draft Ordinance needs to be refined and we should take more time to review this issue.

Chair Carl Wolfe indicated the following:

- My concern is that, if we do not do something today or not do something today, we open the City up to legal challenges.
- I can see there is a definite level of discomfort from the community regarding the draft Ordinance.
- I am not sure we have enough information to make an educated decision on the draft Ordinance.

Vice Chair Altwal moved and Commissioner Cloven seconded a motion to adopt Resolution No. 03-18, recommending City Council denial of an Ordinance amending the Clayton Municipal Code to conditionally allow parolee homes in the following General Plan land use designations: Multifamily Low Density, Multifamily Medium Density, and Multifamily High Density. The motion passed 4-0.

6. OLD BUSINESS

None.

7. NEW BUSINESS

None.

8. COMMUNICATIONS

8.a. Staff


None.

8.b. Commission

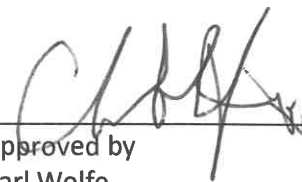
None.

9. ADJOURNMENT

9.a. The meeting was adjourned at 9:36 p.m. to the regularly-scheduled meeting of the Planning Commission on June 12, 2018.



Submitted by
Mindy Gentry
Community Development Director



Approved by
Carl Wolfe
Chair