



# City of Carson Report to Mayor and City Council

September 21, 2010  
New Business Consent

**SUBJECT: CONSIDER RESOLUTION NO. 10-098 APPROVING THE APPLICATION FOR THE SUSTAINABLE COMMUNITIES PLANNING GRANT**

Submitted by Clifford W. Graves  
Economic Development General Manager

*Lisa Berglund for JGM*  
Approved by Jerome G. Groomes  
City Manager

## **I. SUMMARY**

Staff has prepared and submitted an application for a \$750,000.00 grant to prepare a Climate, Energy, and Mobility Action Plan. The subject of this staff report is for City Council to adopt a resolution to formally approve this application. The Sustainable Communities Planning Grant is funded by Proposition 84, the Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Bond Act of 2006. It added Division 43 to the Public Resources Code, Chapter 9, Sustainable Communities and Climate Change Reduction Section 75065(a), authorizing the Legislature to appropriate \$90 million for planning grants and planning incentives that reduce energy consumption, conserve water, improve air and water quality, and provide other community benefits.

## **II. RECOMMENDATION**

TAKE the following actions:

1. WAIVE further reading and ADOPT Resolution No. 10-098, "A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF CARSON, CALIFORNIA, APPROVING THE APPLICATION FOR GRANT FUNDS FOR THE SUSTAINABLE COMMUNITIES PLANNING GRANT AND INCENTIVES PROGRAM UNDER THE SAFE DRINKING WATER, WATER QUALITY AND SUPPLY, FLOOD CONTROL, RIVER AND COASTAL PROTECTION BOND ACT OF 2006 (PROPOSITION 84)."
2. INSTRUCT staff to transmit a copy of the executed resolution to the Strategic Growth Council.

## **III. ALTERNATIVES**

TAKE another action the City Council deems necessary.

10.

**IV. BACKGROUND**

This grant program implements the vision of the Governor and Legislature to foster the development of sustainable communities throughout California. It is designed to help local governments meet the challenges of adopting land use plans and integrating strategies in order to transform communities and create long-term prosperity. Sustainable communities are intended to promote equity, strengthen the economy, protect the environment and promote healthy, safe communities. The primary goal of this grant program is to develop and implement plans that reduce greenhouse gas emissions and achieve the following objectives:

- Improve air and water quality.
- Promote public health.
- Promote equity.
- Increase housing affordability.
- Increase infill and compact development.
- Revitalize urban and community centers.
- Protect natural resources and agricultural lands.
- Reduce automobile usage and fuel consumption.
- Improve infrastructure systems.
- Promote water conservation.
- Promote energy efficiency and conservation.
- Strengthen the economy.

Following areas have been identified as priorities in awarding grants that are consistent with the goals of the program. In evaluating proposals, the state may also consider factors including, but not limited to geographic distribution of bond funds, environmental justice, and partial funding.

- Proposal demonstrates ongoing collaboration with state, regional and local, public and private stakeholders and community involvement.
- Proposal addresses climate change impacts.
- Proposal demonstrates strategies or outcomes that can serve as best practices for communities across the state.
- Proposal is leveraged with additional resources (in-kind or funds).

**Analysis**

Through the adoption of AB 32 (Global Warming Solutions Act of 2006) and SB 375 which directs the Air Resources Board to set regional targets for the reduction of green house gases, the state is holding local governments accountable towards more sustainable developments and reducing greenhouse gas emissions. The first step in this process is to prepare a Climate Action Plan. On August 31, 2010, the application for grant funds was transmitted to the Strategic Growth Council. The

grant application proposes that the proceeds from the grant will be used to hire a consultant to prepare the city's Climate Action Plan. The South Bay Environmental Services Center (SBESC) has prepared the baseline data for municipal operations and expects to complete the communitywide inventory by next month. This information will be used to prepare this Climate Action Plan which would include strategies to meet the state mandated thresholds for greenhouse gas emissions. For example, some of these strategies will focus on reducing energy and water usage in municipal operations, homes, and businesses.

In the grant application, staff proposed a demonstration project that would retrofit one of the residences purchased through the Neighborhood Stabilization Program (NSP). The retrofitting could include more efficient plumbing fixtures, light bulbs, appliances, and Heating Ventilation Air Condition units. It could also include water-efficient landscaping, additional insulation, or more energy efficient windows and doors. The retrofitting costs will be paid through the NSP rehabilitation funds. Therefore, there will not be a direct cost to the city.

The city will use the first house as a demonstration project to determine the energy and water savings compared to similar houses without these improvements. In the grant application, staff proposed to complete at least three demonstration projects through the NSP. Since the houses purchased through the NSP are already planned to be rehabilitated, it makes sense to incorporate it into this program. In addition to the NSP, the city could choose to use the Neighborhood Pride Program in the same manner to promote more energy and water efficient homes for Carson residents. The information from these demonstration projects will be published on our website, in the Carson Report and other public announcements. Carson residents planning to make renovations to their homes can use this information as a guide to determine which energy or water efficiency improvements make the most sense to them comparing their cost and potential savings on utility bills.

In addition, the grant application includes a Mobility Action Plan which will examine travel patterns for Carson residents and the workforce. The results of this data will be analyzed to determine the effectiveness of our transportation infrastructure system and services. The Climate Action Plan will include analysis of our current level of transit service and future needs. It will also look at our existing sidewalks and bike lanes and recommend improvements. Other concepts such as car sharing and ridesharing will also be explored. The completion of the Mobility Plan will provide the city with the information necessary to plan for future improvements to our infrastructure and services to ensure our residents and workforce have other transportation options other than the single occupant automobile.

The most important part of the Climate Action Plan will be public outreach and education. Through surveys and workshops, we will understand the position and needs of our residents and workforce on these issues. Through consolidating

available information and identifying city goals and programs, we will provide the community with a single source of information to find out about energy and water saving tips, type of home improvements that will reduce water and energy bills, and alternative transportation options. The focus of all these efforts will be to create better opportunities for our local elected and appointed officials, residents, businesses and workforce to make choices that further our shared goals to reduce greenhouse gases and establish sustainable communities.

**V. FISCAL IMPACT**

None. Should the city receive a grant award, staff time to administer the grant will be absorbed within approved FY 2010/11 budget.

**VI. EXHIBITS**

- 1. Grant Application. (pgs. 5-23)
- 2. Resolution 10-098. (pgs. 24-25)

Prepared by: Saied Naaseh, Senior Planner

sf:Rev061902

Reviewed by:

City Clerk	<u>City Treasurer</u>
<u>Administrative Services</u>	<u>Development Services</u>
<u>Economic Development Services</u>	<u>Public Services</u>

**Action taken by Redevelopment Agency**

Date \_\_\_\_\_ Action \_\_\_\_\_

## APPENDIX I- PLANNING GRANT APPLICATION FORM

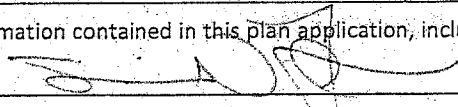
<b>Applicant (Agency &amp; address - including zip)</b>  City of Carson Planning Division 701 E Carson St Carson, CA 90745		<b>Proposed Date of Completion:</b> 2012  <b>Grant Amount Requested:</b> \$ 750,000  <b>If Joint Proposal, list participating entities/ contact person:</b>
<b>Check one</b> City <input checked="" type="checkbox"/> County <input type="checkbox"/> MPO <input type="checkbox"/> COG <input type="checkbox"/> RTPA <input type="checkbox"/> JPA <input type="checkbox"/> Joint Proposal <input type="checkbox"/>		
<b>Lead Applicant's Name:</b> City of Carson		
<b>Title of Proposal</b> (summarize the deliverable to be funded by this grant) Climate, Energy, and Mobility Action Plan		
<b>Applicant's Representative Authorized in Resolution</b> Name: Saied Nasseh Title: Senior Planner Phone: (310) 233-4840 Email: snaaseh@carson.ca.us	<b>Person with Day to Day Responsibility for Plan</b> (if different from Authorized Representative) Name: Title: Phone: Email:	
<i>Check all of the following that are incorporated or applicable to the proposal:</i>		
<b>Focus Area</b>	<b>Program Objectives</b>	
<input checked="" type="checkbox"/> Focus Area # 1		
<input type="checkbox"/> Focus Area # 2		
<input type="checkbox"/> Focus Area # 3	<input checked="" type="checkbox"/>	Applying for 20% EDC set aside
<b>Eligibility Requirements (mandatory)</b>		<input checked="" type="checkbox"/> Improve air and water quality
<input checked="" type="checkbox"/> Consistent with State Planning Priorities		<input checked="" type="checkbox"/> Promote public health
<input checked="" type="checkbox"/> Reduces GHG emissions on a permanent basis		<input checked="" type="checkbox"/> Promote equity
<input checked="" type="checkbox"/> Collaboration requirement		<input checked="" type="checkbox"/> Increase affordable housing
<b>Priority Considerations</b>		<input checked="" type="checkbox"/> Increase infill and compact development
<input checked="" type="checkbox"/> Demonstrates collaboration & community involvement		<input checked="" type="checkbox"/> Revitalize urban and community centers
<input checked="" type="checkbox"/> Addresses climate change impacts		<input checked="" type="checkbox"/> Protect natural resources and agricultural lands
<input checked="" type="checkbox"/> Serves as best practices		<input checked="" type="checkbox"/> Reduce automobile usage and fuel consumption
<input checked="" type="checkbox"/> Leverages additional resources		<input checked="" type="checkbox"/> Improve infrastructure systems
<input type="checkbox"/> Serves an economically disadvantaged community		<input checked="" type="checkbox"/> Promote water conservation
<input type="checkbox"/> Serves a severely disadvantaged community		<input checked="" type="checkbox"/> Promote energy efficiency and conservation
		<input checked="" type="checkbox"/> Strengthen the economy
I certify that the information contained in this plan application, including required attachments, is complete and accurate.		
Signature: 	8/31/2010	
Print Name and Title: Saied Nasseh, Senior Planner		Date

EXHIBIT NO. - 1



## 1. Proposal Summary Statement

City of Carson is a mostly built out city with limited opportunity for new development to shape conservation policy. Carson has long been an advocate of sustainable communities. We were one of the pioneers in adopting a high density mixed use zone in 1994 to attract high density developments to our mixed use corridor along Carson Street, a busy corridor through the heart of our city. The transformation of policy to real projects has been slow; however, it has gained momentum. The first mixed use project with a density of 50 du/ac was constructed in 2000 followed by a similar project currently under construction. In addition, two projects with similar densities will start construction early next year. The Carson Redevelopment Agency (RDA) has played a key role in making these projects a reality by providing financial assistance. With the land use aspect of sustainability well underway, we would like to develop programs that concentrate on more immediate actions to conserve energy and water, reduce vehicle miles traveled, provide alternative means of transportation to support our mixed use efforts, and promote a healthy community.

Therefore, the City of Carson is seeking to secure funding to prepare a Climate, Energy and Mobility Action Plan (Action Plan) and associated implementation programs. Currently, the South Bay Environmental Services Center is preparing the base line data necessary to prepare a Climate Action Plan. We expect this data to be available by September 2010. The City would like to transform this data into an Action Plan that includes specific, meaningful and implementable recommendations. We would like to implement the Action Plan through existing and new funding programs available through the city and other sources. We understand that a tremendous amount of programs and information is available through many sources to implement and fund energy/water efficiency measures for existing buildings. However, we would like to develop and market a single source for our residents and businesses to utilize these existing programs and develop new ones. We would also like to develop a financial model for a typical home in Carson.

Our housing stock was built in the 40's and 50's. We believe a tremendous amount of energy/water can be saved through retrofit programs. This financial model would look at variables such as cost of improvements, increase in property values, potential savings in utility bills, and the reduction in greenhouse gas emissions. The model is intended to assist homeowners to make sound decisions when making home improvement choices. To verify the accuracy of the model, we would like to showcase a demonstration project, funded by the RDA and other available grants, apply the retrofit improvements, and monitor the energy and water saving. It should be noted that the retrofit demonstration project would simulate improvements for a typical household with strong emphasis on the least amount of money spent to gain the most savings in water and energy bills and most reduction in emissions. The model and the demonstration project can become a model for the entire region.

This proposal meets the intent of Focus Area #1 which is to support the development and implementation of effective and/or innovative local plans that support the state's AB 32 greenhouse gas reduction targets and implement SB 375. The City of Carson would like to prepare an Action Plan that concentrates on improving the energy efficiency of our existing building stock and by providing alternative transportation options to our residents and people who work in Carson. We believe this effort will provide solutions that support community-wide sustainability strategies by reducing greenhouse gas emissions from buildings and automobiles and trucks and complement our existing land use policies for mixed use developments in the core of our city along Carson Street.



## Proposal Description

### Step 1: Threshold Requirements

1.
  - a. This proposal does not promote urban sprawl. It proposes to invest into the existing community by enhancing energy and water efficiency of the existing building stock in order to reduce emissions. It also proposes to improve the existing infrastructure to promote alternative means of transportation such as walking, biking, car sharing, carpooling, and mass transit. The improvements to the infrastructure will promote infill development and redevelopment. These improvements will strengthen the economy since they create additional construction jobs and help the residents and businesses save money in energy and transportation costs which would in turn increase disposable income - further strengthening the economy. This proposal also promotes equity within the community since the funding to make the improvements will be partially funded through the city's existing Neighborhood Pride Program designed to assist low income families.
  - b. The proposal will indirectly protect, preserve and enhance environmental and agricultural lands, and natural and recreational resources as it promotes infill development; therefore, reducing urban sprawl which has a negative impact on the said resources.
  - c. City of Carson is a mostly built out community with some potential for in-fill development. Since the City's zoning ordinance includes a mixed use zoning that encourages high density development, the new in-fill developments will be built to use land efficiently, will be built adjacent to existing developed areas, will be located in an area appropriately planned for growth, and will be served by adequate transportation and other essential utilities and services, and will minimize ongoing costs to taxpayers. Furthermore, the Proposal includes measures that would reduce utility costs for the taxpayers. The Proposal will also include recommendations to improve alternative transportation infrastructure and services such as sidewalks, bike lanes, and transit service further encouraging in-fill development.
2.
  - a. California's Global Warming Solutions Act of 2006
    - i. The proposal reduces greenhouse gas emissions in two ways increased energy and water efficiency for buildings and reduced VMTs. The VMT reduction would be result of recommendations to improve alternative transportation infrastructure and services such as sidewalks, bike lanes, and transit service. These reductions will have more immediate impact in reducing green house gas emissions compared to long term land use policies which the city adopted in 1994 to promote high density mixed use development in our core along Carson Street.
    - ii. The proposal will develop tools to quantify the reductions for greenhouse gas emissions for every implementation measure that is proposed. For



example for We would like our Action Plan to include a financial model that includes variables such as cost of improvements, increase in property values, potential savings in utility bills, and the reduction in greenhouse gas emissions for a typical home for each of the energy efficiency mitigation measures such as changing windows, upgraded insulation, heating and air conditioning units, upgrading plumbing fixtures with water efficient units, removing grass and replacing it with water efficient plants, etc. We believe this analysis will assist the home owners in making intelligent and informed home improvement decisions that reduce their utility bills, increase their property values, and saves the environment at the same time.

b. Any applicable regional plan

- i. California Transportation Plan, Integrated Regional Water Management Plan, State Water Plan, RHNA.
- ii. The Proposal is consistent with the greenhouse gas emission reduction strategies stated in the California Transportation Plan as it meets Goal 6 to enhance the environment by providing transportation services while protecting our environment, wildlife, and historical and cultural assets since the proposal requires studying and building a multi modal transportation system that caters to travel the needs of Carson residents and those who work here.

The proposal is consistent with the Integrated Regional Water Management Plan (Los Angeles Region) from a water quality and water supply point of view as it promotes water efficiency and reduces VMTs which would reduce the contaminants produced by vehicles washed into the water supply.

According to the State Water Plan, climate change is already impacting California's water resources – its snow pack, river flows, and sea level. This proposal aims to address climate changes that impact water supply; therefore, the proposal is consistent with the State Water Plan.

RHNA promotes infill development and protection of environmental resources. This proposal address this issues as it makes the existing housing stock more attractive by making them water and energy efficient. RHNA also promotes the improved intra regional relationship between jobs and housing. The proposal addresses this point by looking at the travel patterns of Carson residents and people who work in the city with a goal of increasing transportation choices such as walking, biking, and using transit by awareness and new policies that lead into additional infrastructure and services.

3. Please refer to the attached letter from SCAG.

**Step 2: Program Objectives**

**Improve Air and Water Quality**



### Air Quality

1. We would like to use energy and water use reduction and reduced VMT as two strategies to improve air quality. To implement this plan, we would like to encourage increasing the water and energy efficiency of the existing buildings in Carson. In addition, we would like to understand the travel patterns for our 97,000 residents and the 68,000 people who work in Carson. We would like to use the travel pattern behavior to form policy decisions that would encourage people to use alternative means of transportation including walking, biking, carpooling, car sharing, and using mass transit to reduce vehicle miles traveled. We believe these actions will be most effective for our community and will complement our efforts that we have already placed on creating a high density mixed use core along Carson Street. Our mixed use district will especially benefit by an efficient mass transit that requires further study included with this proposal. The proposal will also educate people to conserve non-renewable energy by using alternative fuels or more fuel efficient cars.
2. The Action Plan and its implementation tools will quantify reduction of greenhouse gas emission levels. We would like our Action Plan to include a model that estimates the typical emission reduction for a typical home for each of the energy efficiency mitigation measures such as changing windows, upgraded insulation, heating and air conditioning units, upgrading plumbing fixtures with water efficient units, removing grass and replacing it with water efficient plants, etc. We believe this information will encourage the home owners to take the steps necessary in making intelligent and informed home improvement decisions that will reduce their utility bills, increase their property values, and reduce greenhouse gas emissions and water at the same time. We further expect the Action Plan to require long term monitoring of the trip patterns that are either generated in Carson (by the residents) or by trips that end in Carson (by the work force). This monitoring will allow quantification of the reduction in emissions. The proposal will conduct surveys on car ownership trends in the city with alternative energy or more fuel efficiency.
3. The proposed Action Plan will be prepared consistent with the Air Resources Board's State Implementation Plan(s) and the Air Resources Board's (ARB's) newly proposed greenhouse gas emission reduction goals.

### Water Quality

4. The City's proposal reduces water demand which in turn makes water available to others and reduces urban runoff. It is proposing to reduce water consumption both inside and outside the homes and businesses by utilizing retrofit programs and water efficient landscaping and irrigation systems. Reducing VMTs will have positive impact in water quality as the amount of contaminants associated with traveling cars would be reduced.
5. The impacts to water quality will be positive but negligible; however, the city will monitor the reduction in water bills and the reduced VMTs through surveys.
6. The proposal is consistent with the Integrated Regional Water Management Plan (Los Angeles Region) from a water quality and water supply point of view as it promotes water efficiency and reduces VMT which would reduce the contaminants produced by vehicles washed into the water supply.



According to the State Water Plan, climate change is already impacting California's water resources – its snow pack, river flows, and sea level. This proposal aims to address climate changes that impact water supply; therefore, the proposal is consistent with the State Water Plan.

### Promote Public Health

1. The city will ensure the construction of the improvements to sidewalks and bike lanes through inclusion in the Capital Improvements Project list (CIP). Promote these facilities and the healthy retail establishments and restaurants through our website.
2. The City of Carson is at an important crossroads concerning how we envision redeveloping our city to create an environment that encourages and supports a variety of healthy behaviors. As a city with high levels of both adolescent and adult obesity, and clear evidence of deficits in both physical activity and nutrition, we recognize the importance of improving access to, promotion of, and support for physical activity and nutrition. This proposal would put us well on the way to achieving these goals. The city has already made a statement to become a healthier community by organizing our first triathlon which will take place on October 23, 2010, <http://tri.carson.ca.us/registration.asp>.
3. Though this effort, the city has shown that it can build relationships with the businesses community in the city to promote a healthier life style for our residents. Some of our partners in this event are California State University Dominguez Hills, Kaiser Permanente, Chivas USA, Carson Chamber of Commerce, etc.

The proposal would incorporate 3 evidence-based physical activity components (Access, Promotion, and Social Support) and 1 nutrition component (Promotion) into a 4-phase initiative. The first phase of the initiative involves conducting walk-ability and bike-ability assessments of the areas surrounding most of the city's schools, parks, and other civic and commercial sites. Findings from the assessments will assist the city in making immediate low-cost improvements to enhance walk-ability and bike-ability. As a result, the city will be able to increase access to everyday opportunities for physical activity. Moreover, this increase in physical activity will occur in highly visible public areas (e.g., sidewalks, bike lanes), which itself may contribute to a city-wide culture change that may become self-fulfilling and self-sustaining. As walk-ability and bike-ability are being optimized through these low-cost improvements, the second phase will develop signage and simple media efforts to promote the most walk-able and bike-able thoroughfares throughout the city. In addition, signage will be created to promote the patronage of markets and restaurants that sell substantial amounts of fresh fruits and vegetables along these thoroughfares. Businesses providing these items will be given the option of placing a highly visible fresh fruits and vegetables icon in their windows and on their websites. The third phase would provide social support to encourage citizens not only to take advantage of these improvements in walk-ability, bike-ability, and healthy food options, but also to advocate for further improvements by their use and patronage of promoted areas and businesses—in other words, to vote (quite literally) with their feet.

4. We have already identified high levels of both adolescent and adult obesity, and clear evidence of deficits in both physical activity and nutrition, we recognize the importance of improving access to, promotion of, and support for physical activity and nutrition. Our proposal would put us well on the way to achieving these goals.



5. The City has a great working relationship with UCLA/RAND Center for Adolescent Health Promotion and YFSC-PIA, Youth, Family, School, and Community-Partnership In Action (a grassroots community based group that provides volunteer work to bring the school and the community closer together) and have their commitments to be involved in the Proposal.

#### **Promote Equity**

4. The proposal will recommend improvements to the transportation infrastructure alternative means of transportation. The proposal will also ensure equity through reduction in utility bills and financing of retrofit improvements for homes through the Neighborhood Pride Program which caters to low income families and other available sources.
5. Annual surveys will be used to see if travel patterns have changed. Utility bills will be monitored to determine whether the retrofit program has reduced the utilities bills.
6. City of Carson as a whole or individual census tracts do not meet the income requirements for economically disadvantaged communities or neighborhoods.

#### **Increases Housing Affordability**

1. Since the proposal includes implementation measures that reduce energy and water bills for homes, it would in turn make housing more affordable for both the existing residents and also future owners of homes that will be retrofitted. The older housing stock suffers from lack of energy efficiency and the majority of the Carson's housing stock was built in the 1940's and 1950's.
2. The energy and water bills will be monitored annually to demonstrate the effectiveness of the retrofitting to save energy and water.
3. The proposal will increase housing affordability in Carson in an equitable manner by reducing energy and water costs. It will also promote infill development as it will provide additional choices for people seeking energy and water efficient housing other than new developments which generally occur in new communities outside developed areas. In addition, the proposal provides socioeconomic equity as it will provide energy and water savings to residents that need the financial assistance the most. The proposal will serve to protect the environmental and resources since it will reduce emissions that result from excessive use of water and energy in existing housing stock. The creation of energy and water efficient housing would promote additional housing opportunities for the 68,000 people that work in Carson that otherwise live outside Carson increasing the jobs and housing balance.

#### **Promote Infill and Compact Development**

1. The proposal will promote infill development as it will provide additional choices for people seeking energy and water efficient housing other than new developments which generally occur in new communities outside developed areas.



Since Carson is a mostly developed city, there is limited opportunity for new development to shape conservation policy. However, through redevelopment the city has been able to attract high density developments within our mixed use corridor along Carson Street. Carson was one of the pioneers in adopting a mixed use zone in 1994. One mixed use project with a density of 50 dwelling units per acre was constructed in 2000 with another one currently under construction. In addition, two other projects with similar densities are proposed and are under serious consideration for construction. All these projects have or will be receiving funding from the RDA.

2. The city will track the number of infill units that will be built in the city.

### **Revitalize Urban and Community Centers**

1. Through redevelopment the city has been able to attract high density developments to the city's core within our mixed use corridor along Carson Street. Carson was one of the pioneers in adopting a mixed use zone in 1994. One mixed use project with a density of 50 dwelling units per acre was constructed in 2000 with another one currently under construction. In addition, two other projects with similar densities are proposed and are under serious consideration for construction. To further assist in future development of our mixed use district, through this proposal, the city will be making policy decisions to add alternative transportation modes both in terms of infrastructure and services such as sidewalks, bike lanes, transit services, car sharing, carpooling, etc. Additional steps that the city will be taking through this proposal is strengthening the existing housing stock around our mixed use district by retrofitting them to be more water and energy efficient.
2. The RDA has and will be investing over \$20,000,000 on mixed use projects. We are currently in the consultant selection process for implementing a \$12,000,000 streetscape project to revitalize Carson Street to further encourage the revitalize our urban core and to make it more pedestrian friendly for our high density mixed use developments. Carson is committed to revitalize our mixed use district to encourage even more high density mixed use projects. We are currently analyzing all properties within the Carson Street mixed use corridor to identify potential development areas for additional mixed use developments.

### **Protect Natural Resources and Agricultural Land**

1. The proposal will indirectly protect, preserve and enhance environmental and agricultural lands, and natural and recreational resources as it promotes infill development; therefore, reducing urban sprawl which has a negative impact on the said resources. The proposal will also educate people to conserve energy and water by making energy efficiency retrofit improvements or conserve non-renewable energy by using alternative fuels or more fuel efficient cars
2. The city will monitor the infill development applications and through surveys on car ownership trends in the city with alternative energy or more fuel efficiency.
3. Through encouraging infill development and promoting retrofitting existing housing stock with energy and water efficient improvements, the proposal will reduce the need for urban sprawl that would make open space lands inaccessible for mineral resources exploration.



### **Reduce Automobile Use and Fuel Consumption**

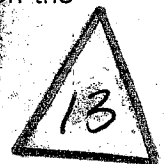
1. The proposal will examine the travel habits and behaviors for residents and people working in Carson to determine public policy to improve, install and operate alternative means of transportation such as public transit, sidewalks, bikeways. The proposal will also educate people to conserve non-renewable energy by using alternative fuels or more fuel efficient cars.
2. Through annual surveys send to the residents, the city will monitor travel habits and behaviors to determine whether the public policies were effective in changing these habits and behaviors. The surveys will also examine car ownership trends in the city with alternative energy or more fuel efficiency.
3. The proposal advocates diverse transportation networks and services. It will examine alternative means of transportation such as walking, biking, transit, car sharing, carpooling, etc. The proposal's recommendations will shape future citywide policies.

### **Improve Infrastructure Systems**

1. After studying and understanding the travel habits and behaviors, the proposal will create citywide master plans that recommend infrastructure necessary to increase mobility choices that result in reduced VMTs. The proposal will also recommend implementation tools such as public awareness campaigns that will be necessary to change the current travel habits and behaviors to use alternative transportation. One of the goals of the proposal is to educate residents and people who work in Carson how much money people can save by using other means of transportation, alternative fuels, more fuel efficient cars, or not owning cars.
2. Annual surveys will be used to determine whether education and the new infrastructure have changed travel habits and behaviors resulting in reduced VMTs. The proposal will conduct surveys on car ownership trends in the city with alternative energy or more fuel efficiency.

### **Promote Water Conservation**

1. The proposal will quantify the amount of water that needs to be conserved by establishing a reduction goal. It will then quantify the water savings for a typical house given a set of improvements. For example a typical home of 1,500 with two bathrooms includes 5 sets of faucets inside the home. The proposal will quantify the cost for upgrading all faucets, the amount of water that will be saved based on typical usage of family of four, and it would then provide the dollar amount saved in water bills. The proposal would also attempt to quantify the increase in property value for these and other improvements. The homeowner who is planning to do home improvements or is looking to save money in the long run will then be able to make an informed decision regarding this improvement and compare this improvement to other improvements in terms of cost and savings provided to the homeowner. The end result is reduction in water usage and the resulting reductions in green house gas emissions.
2. The city will monitor the water usage through water bills to determine the accuracy of the predicted savings in water usage to cost savings to establish the rate of return on the investment.



3. We believe this approach will either meet or exceed the 20% reduction by 2010. This effort will be either funded by homeowners who will be more inclined to make the investment in their home since they know the rate of return on their investment or by the Neighborhood Pride Program that is designed to assist low income families in Carson. The proposal will also examine other funding sources such as utility companies.
4. The proposal is consistent with the Integrated Regional Water Management Plan (Los Angeles Region) from a water quality and water supply point of view as it promotes water efficiency and reduces VMT which would reduce the contaminants produced by vehicles washed into the water supply.

### **Promote Energy Efficiency and Conservation**

1. The proposal will quantify the amount of energy (electricity and gas) that needs to be conserved by establishing a reduction goal. It will then quantify the energy savings for a typical house given a set of improvements. For example a typical home of 1,500 with two bathrooms includes 15 light bulbs inside the house. The proposal will quantify the cost for upgrading all light bulbs, the amount of electricity that will be saved based on typical usage of family of four, and it would then provide the dollar amount saved in electricity bills. The homeowner who is planning to do home improvements or is looking to save money in the long run will then be able to make an informed decision regarding this improvement and compare this improvement to other improvements in terms of cost and savings provided to the homeowner. The end result is reduction in electricity usage and the resulting reductions in green house gas emissions. The proposal will also educate people to conserve non-renewable energy by using alternative fuels or more fuel efficient cars.
2. The city will monitor the electricity usage through water bills to determine the accuracy of the predicted savings in electricity usage to cost savings to establish the rate of return on the investment. The surveys will also examine car ownership trends in the city with alternative energy or more fuel efficiency.

### **Strengthen the Economy**

1. The proposal will create green jobs by the retrofit program and increase the disposable income for homeowners since they would be spending less on energy and water bills.
2. The city will monitor the water and electricity usage through water and electricity bills to determine the amount of savings in water and electricity bills. In addition, the city will keep track of the total amount of dollars spent by homeowners on the retrofit program.

### **Step 3: Priority Considerations**

1.

a.

During the preparation of the Action Plan, the city would notify the appropriate agencies, stakeholders, and interested parties to obtain their input and participation. A consultant would be hired to initiate the development of the



Action Plan, the financial model, the transportation infrastructure master plans (sidewalks, bikeways, transit, car sharing, carpooling, and other mobility aspects of the proposal), survey questioners regarding travel behavior, and all other follow-up surveys for the indicators such as annual surveys to detect any significant travel behavior changes by residents and commuters, thereby allowing the city to adjust policy accordingly. UCLA/RAND and YFSC-PIA would prepare a portion of the proposal that would tie walk ability and bike ability to the healthy communities aspect of the proposal. The Carson Circuit is Carson's own bus system, with service throughout Carson and connections to the Metro Blue Line and regional bus services from Torrance Transit, the MTA, Long Beach Transit and Gardena Municipal Bus Lines. The proposal will collaborate with these agencies to ensure an efficient transit system for Carson. The most important part of the proposal is the public participation and awareness program that includes public meetings, website development that includes gathering all currently available and newly developed information for the residents and businesses in one central location.

Our local partners (businesses, community groups, schools, churches, other local organizations) would be informed of our initiatives to reduce energy consumption and carbon emissions, acting as liaisons to the city and directing them to obtain more information from the city.

Once South Bay Environmental Services Center has provided baseline data for the region, a Climate Action Plan (CAP) would be jointly formulated by the consultant and the city, with the city performing a more supervisory role, continually evaluating the data and the associated implications on the CAP.

- b. The proposal will conform to various state, regional, and local plans, requiring communication between various governmental agencies to ensure vertical consistency amongst numerous guiding documents. From state agencies (Caltrans, Cal EPA, Climate Action Team), to regional authorities (SCAG, South Bay Council of Governments, South Bay Environmental Services Center, Metro), to local agencies and neighboring cities (City of Carson Environmental Commission, Chamber of Commerce, City of Torrance, City of Los Angeles), to residents as well as local and regional businesses, the City of Carson is prepared to collaborate with the jurisdictions necessary to ensure transparency, accuracy, and participation. The proposal will include participation from these agencies to tap into their publicly available resources as not to duplicate efforts that have already been completed.
- c. The most important part of the proposal is the public participation, education, and awareness program that include public meetings, website development that includes gathering all currently available and newly developed information for the residents and businesses in one central location. Residents will be given ample opportunity to submit comments and participate in the preparation of the Action Plan. Our local partners (businesses, community groups, schools, churches, other local organizations) will also be invited to our public participation workshops. Our website would be updated accordingly with the latest information, giving the community access to a constant repository of useful links, initiatives, funding sources, and reduction strategies they may implement individually. The proposal will also recommend ways to engage the community



on ongoing bases well after the Action Plan is completed. If accepted by the City Council, dedicated staff may also be assigned to actively market the available retrofit programs to the residents and businesses.

2.

- a. A tremendous amount of information is currently available from many sources and agencies that address retrofitting possibilities for existing buildings, available funding sources, and information regarding mobility options such as transit, ridesharing. We would like the consultant to gather all this information together with other new information in one central place and easy to use for staff, residents, and the community. We believe this portion of the proposal will be a great asset to the entire state. In addition, our financial model and demonstration project can also be showcased to the entire state to encourage the average household to make cost effective retrofit improvements to their homes.
- b. Online availability is important to us, as well equitable access to information. Of course, materials advertising/promoting the programs and surveys would be readily available at our front counter in city hall as well at our redevelopment offices, community center, park facilities, schools, libraries, and other public places.

3.

- a. The city staff will be providing the staff time necessary to the development and implementation of the programs identified in the proposal, managing consultant, and collaboration with our partners and agencies, and the community. We would like the selected consultant(s) to include recommendations on how to best market the programs on an on-going bases after the completion of the Action Plan including but not limited to dedicated staff for these programs. During the adoption process for the Action Plan, the City Council will make a determination whether they support this idea. In addition, to encourage more community involvement, the city would solicit the help of volunteers to promote the various initiatives, acting as ambassadors of the program and gaining the trust of residents. Total staff time is estimated to be approximately \$100,000.

In addition, through the Neighborhood Stabilization Program (NSP), the city will make a single family house and/or multi-family unit available for the residential retrofit program and provide the necessary funding to construct the retrofit improvements. This contribution, including the value of the unit and the improvements will be in the vicinity of \$200,000. Through the NSP, the City plans to purchase approximately 30 units in 2011 with a \$5,000,000 budget to purchase and rehabilitate houses. The city will also commit to make at least two additional units part of the demonstration project as they are purchased, rehabilitated, and made available for qualified low income families who can benefit from reduced energy and water costs. However, more homes could be targeted for the retrofit program. Total contribution is approximately \$600,000 for the three demonstration projects (please note that the homes are purchased by the city to be resold after the retrofitting is completed). With these demonstration projects, the community can point out to actual houses that have received the



retrofitting and not just pictures and suggestions on a website. Therefore, the city's contributions could add to millions of dollars.

- b. In the future the city may be able to allocate more resources to the proposal if grant funding has been secured.

4. Proposal Addresses Climate Change Impacts.

- a. Climate change could have a significant impact on the City of Carson, its residents, and businesses. Carson includes many heavy industries included oil refineries. It is also in close proximity to the Long Beach and Los Angeles Ports and many of the businesses are directly dependent on the ports. If the climate change is allowed to be continued unchecked; there could potentially be great impacts on the ports and large industries. Therefore, new tougher regulations will be necessary which could greatly curb their functions.
- b. It is to everyone's benefit to deal with climate change issues now rather than later by adopting meaningful Action Plans. These potential impacts on the operation of the ports and the nearby industry would have a great financial impact on the residents of Carson. They need to be made aware of this situation and need to realize that their own choices and behaviors also have a big impact on their future and their children's future. Therefore, a local grassroots effort needs to start educating people about the consequences of inaction and provide easy to understand solutions to the residents.

5. The proposal does not serve an economically disadvantaged community.

**Step 4: Organizational Capacity**

1. The Proposal will be managed by Mr. Saied Naaseh, Senior Planner in the Economic Development Work Group (EDWG). Mr. Naaseh is uniquely positioned in the EDWG with access and information to the NSP, Neighborhood Pride Program, and Grow Carson Fund programs. The retrofit demonstration project will be funded by the NSP a currently staffed program in the city that purchase homes with the intention of rehabilitation and resale to qualified low income families. In addition, the retrofit program for homes will be partially funded by the city's existing and staffed Neighborhood Pride Program (NPP, [http://ci.carson.ca.us/content/departement/eco\\_dev\\_service/neighbor\\_pride.asp](http://ci.carson.ca.us/content/departement/eco_dev_service/neighbor_pride.asp)) which caters to low income families. This program provides grants and loans to homeowners for home improvements. For businesses, we have established a flexible term loan financing program through Grow America Fund, Inc (GAF) that the business owners can use the funds for retrofitting for energy and water efficiency improvements and also buy appliances and/or equipment that are more energy efficient. Our business development division is always involved in assisting existing or future businesses in improving their buildings and modernizing their equipment. This program is fully staffed and currently assists home owners with home improvements. The home owners who do not meet these income requirements can use the city's new program that allows home owners to make energy efficiency improvements, financed through payments on their property tax.



2. The city can draw upon many partners that we have build good working relationships over the years. At this time, our partners include SBESC (responsible to prepare baseline data for the CAP and assist further in preparation of CAP), Carson Chamber of Commerce and Economic Development Commission (assist in coordination with business owners), GAF (assist in securing energy efficiency loans for businesses), NSP (funding for purchasing and retrofitting homes, [http://ci.carson.ca.us/content/department/eco\\_dev\\_service/nsp.asp](http://ci.carson.ca.us/content/department/eco_dev_service/nsp.asp)). UCLA/RAND Center for Adolescent Health Promotion (assist in the healthy community aspect of the proposal and work closely with the public schools in Carson), YFSC-PIA, Youth, Family, School, , and Community-Partnership In Action (a grassroots community based group that provides volunteer work to bring the school and the community closer together), Green Task Commission and Environmental Services Commission (assist in developing ideas for grassroots effort for public outreach, education, and continued marketing of the proposal). After funding is secured, additional entities could be added as partners as we had partnership before on other projects such as Kaiser Permanente (just purchased an existing building for their offices and are committed to be involved in the community in health related areas), Chivas USA Soccer Club (an active member in the community interested in promoting recreational programs and healthy life styles).
3. Mr. Naaseh has over 20 years of experience in the private and public sector planning and development. He has managed many large and complex projects that include managing several multi disciplinary consultants for the same project. These previous experiences would enable Mr. Naaseh to keep the consultant focused on this multi disciplinary proposal within schedule and on budget. Mr. Naaseh will prepare the scope of work for the Request for Proposal (RFP) to select a consultant to prepare the Action Plan. His unique experience with selecting and working with consultant will prove to be a valuable asset as the completeness and the level of detail within the scope of work often determines whether the project is on schedule and within budget.
4. In the event that the project goes over budget, staff is prepared to assist in preparation of documents and research to ensure the project is completed within budget.
5. The implementation of the Action Plan requires educating the community on the importance of the task at hand and how they can personally benefit for the implementation of the Proposal. We would like to emphasize public involvement, awareness, and ownership (both residents and the business community) during the preparation of the Action Plan and even more importantly in the implementation stage. Therefore, community workshops, on-going active marketing of the programs, website development, opinion surveys, focused surveys, etc. will be play a key role in implementing the Proposal. In addition, implementing the recommendations of the proposal and the constructing the infrastructure and providing the services associated with the proposal will be critical to achieving its goals and objectives.



## APPENDIX L- Budget Form

All cost elements included should be clearly described in the Proposal.

Proposal Element (Example Only)	Total Cost	Council Grant	In-Kind Match	Cash Match
	\$	\$	\$	\$
<b>1 Administration</b>				
Staff			100,000	
Consultant Contracting	10,000			
Surveys	15,000			
<b>Subtotal Task 1</b>	<b>25,000</b>		<b>100,000</b>	
<b>2 Proposal Development</b>				
Research <sup>1</sup>	600,000			
Drafting	50,000			
<b>Subtotal Task 2</b>	<b>650,000</b>			
<b>3 Public Outreach</b>				
Announcements	25,000			
Web posting costs	15,000			
Public forum costs	25,000			
<b>Subtotal Task 3</b>	<b>65,000</b>			
<b>4 Materials</b>				
Reprographics	10,000			
<b>Subtotal Task 4</b>				
<b>5 Implementation</b>	3 Demonstration Projects funded through NSP			600,000
<b>GRAND TOTAL</b>	<b>750,000</b>		<b>100,000</b>	<b>600,000</b>

\*\*Additional budget detail may be required upon award of funding

<sup>1</sup> Includes healthy communities plan, bike plan, climate action plan, transit plan, demonstration project, and data collection



**APPENDIX M- WORK PLAN**

**Work Plan**

<b>Lead Applicant:</b> City of Carson
<b>Proposal Title:</b> Climate, Energy, and Mobility Action Plan

High Level Activities/Milestones	Responsible Party	Proposed Start/End Dates
-Notify appropriate local, regional, and state agencies and stakeholders	City	Q4 2010
-Community meetings and public awareness campaign	Consultant/City	Q4 2010/Q4 2011
-Utilize SBESC baseline data to formulate Climate Action Plan (CAP)	Consultant/City	Q4 2010/Q4 2011
-Develop model to quantify energy/water savings	Consultant	Q4 2010/Q1 2011
-Initiate residential retrofit demonstration project	City	Q1 2011
-Conduct commuter/transportation/travel behavior survey	Consultant	Q1 2011
-Prepare mobility master plan (sidewalks, bike lane, transit service, carshare rideshare, etc.)	Consultant/City "	Q4 2010/Q4 2011 "
-Prepare marketing material/web site information	Consultant/City	Q1 2011/Q4 2011
-Conduct surveys	Consultant	Q1 2011/Q2 2011
-Continue implementation through collaboration with community stakeholders and partners	City "	Q1 2012 & Beyond "

**Climate, Energy, and Mobility Action Plan  
INDICATORS AND OUTCOMES**

Program Objectives	Indicators (Data Point)	Desired Outcomes
Improve Air Quality and Water Quality	Greenhouse Gas Emissions Contaminated stormwater runoff	Decrease Decrease
Promote Public Health	Overweight/obese population Population with diabetes Amount of hours of physical activity Number of stores selling produce and healthfood	Decrease Decrease Increase Increase
Promote Equity	Access to alternative modes of transportation Cost of utilities	Increase Decrease
Increase Affordable Housing	Supply of affordable housing which requires reduced energy demand and features "green" components	Increase
Promote Infill and Compact Development	Number of new, high-density mixed-use projects with commercial and retail	Increase
Revitalize Urban and Community Centers	Dollars spent on streetscape projects, bike lanes, sidewalks, transit services, and programs encouraging alternative transportation modes/reduction in VMTs	Increase
Protect Natural Resources and Agricultural Lands	Amount of infill development Acres of agricultural and/or park land preserved	Increase Constant
Reduce Automobile Usage and Fuel Consumption	Transit ridership Vehicle miles traveled for solo motorists/vehicle ownership Use of alternative fuels and more efficient cars & trucks	Increase Decrease Increase
Improve Infrastructure Systems	Number of alternative fuel stations installed Educational/awareness campaigns held Build sidewalks/bike lanes	Increase Increase Increase
Promote Water Conservation	Residential water usage	Decrease
Promote Energy Efficiency and Conservation	Residential energy consumption (water, electricity) Fuel consumption	Decrease Decrease
Strengthen the Economy	Number of jobs Disposable income	Increase Increase





# CITY OF CARSON

August 31, 2010

## Sustainable Communities Planning Grants Program

c/o Department of Conservation  
Division of Land Resource Protection  
801 K Street, MS Floor 18-01  
Sacramento, CA 95814

Subject: Funding Request for Climate, Energy, and Mobility Action Plan

Dear Strategic Growth Council Members,

The City of Carson is continually searching for more opportunities to conserve natural resources and enhance the quality of life for our residents. We are committing to the goals of the sustainable communities program by preparing a Climate, Energy, and VMT Reduction Action Plan.

City of Carson is devoted to reducing our greenhouse gas emissions by identifying energy and water efficiency programs for our residents and businesses and reducing the amount of Vehicle Miles Traveled (VMT) through providing alternative transportation systems and services. We plan to retrofit an existing home with energy and water efficient improvements and use it as a demonstration project to show how much a typical homeowner could save in electricity and water bills by making these improvements. This demonstration project will be funded by the Neighborhood Stabilization Program. Once the Action Plan and the demonstration project are in place, the city will use an aggressive campaign to inform the residents regarding the programs that are available to meet our emission reduction targets and identify the benefits of the programs to the residents and business owners.

We are committed to making the city a healthier, more sustainable, and more equitable place to live. As required, a signed resolution from our City Council will be submitted prior to October 5, 2010 to supplement our application. Should you have any questions, please feel free to contact Saied Naaseh at (310) 233-4840 or [snaaseh@carson.ca.us](mailto:snaaseh@carson.ca.us).

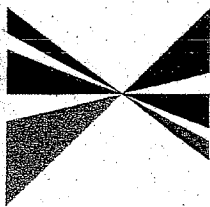
We look forward to a more sustainable future.

Sincerely,

Jerome G. Groomes  
City Manager



SOUTHERN CALIFORNIA



**ASSOCIATION of GOVERNMENTS**

**Main Office**

818 West Seventh Street  
12th Floor  
Los Angeles, California  
90017-3435

t (213) 236-1800

f (213) 236-1825

www.scag.ca.gov

**Officers**

President

Larry McCallon, Highland

First Vice President

Pam O'Connor, Santa Monica

Second Vice President

Glen Becerra, Simi Valley

**Executive/Administration Committee Chair**

Larry McCallon, Highland

**Policy Committee Chairs**

Community, Economic and Human Development  
Bill Jahn, Big Bear Lake

Energy & Environment  
Margaret Clark, Rosemead

Transportation  
Greg Pettis, Cathedral City

August 25, 2010

Bruce Gwynne  
Sustainable Communities Planning Grants Program  
c/o State of California Department of Conservation  
Division of Land Resource Protection  
801 K Street, MS Floor 18-01  
Sacramento, CA 95814

**RE: City of Carson Sustainable City Neighborhood Revitalization Plan – Strategic Growth Council Sustainable Communities Planning Grant Application Consistency with Regional Goals**

Dear Mr. Gwynne,

The City of Carson has submitted its Sustainable Communities Planning Grant application summary to the Southern California Association of Governments (SCAG) for review regarding consistency with regional goals. SCAG is officially designated by the Federal and State governments as a Council of Governments (COG), a Multi-County Transportation Planning Agency, and the Metropolitan Planning Organization (MPO) for the Southern California region. As such, SCAG has a number of formal authorities and responsibilities, including:

- Preparation of the Regional Transportation Plan (RTP) and Federal Transportation Improvement Program (FTIP)
- Preparation of Regional Housing Needs Assessment allocations for cities and counties
- Developing the Sustainable Communities Strategy (SCS) as part of the 2012 RTP

The City of Carson proposes to use grant funds to develop a Climate Action Plan (CAP). The CAP has three main objectives. The first is to address green house gas emissions through more responsible development patterns. Second, the City intends to develop a model to help the community realize energy saving costs. By conducting an energy audit and quantifying the difference between more energy-efficient alternatives, residents can gain a better understanding of costs savings. And finally, the City would like to reduce Vehicle Miles Traveled (VMT) by integrating more bicycle friendly streets via the Carson Street Master Plan update and Master Plan of Bikeways, analyzing travel patterns and improving network efficiency, as well as exploring alternative modes of transportation.

SCAG finds that the City of Carson's application would be consistent with Regional Transportation Plan goals and Compass Growth Visioning principles, as well as implement SB 375. Please feel free to contact us if you have any questions.

Sincerely,

Huasha Liu  
Director, Land Use and Environmental Planning

DOCS# 158105



RESOLUTION NO 10-098

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF CARSON, CALIFORNIA, APPROVING THE APPLICATION FOR GRANT FUNDS FOR THE SUSTAINABLE COMMUNITIES PLANNING GRANT AND INCENTIVES PROGRAM UNDER THE SAFE DRINKING WATER, WATER QUALITY AND SUPPLY, FLOOD CONTROL, RIVER AND COASTAL PROTECTION BOND ACT OF 2006 (PROPOSITION 84)

WHEREAS, the Legislature and Governor of the state of California have provided funds for the program shown above; and

WHEREAS, the Strategic Growth Council has been delegated the responsibility for the administration of this grant program, establishing necessary procedures; and

WHEREAS, said procedures established by the Strategic Growth Council require a resolution certifying the approval of application(s) by the City Council before submission of said application(s) to the state; and

WHEREAS, the City, if selected, will enter into an agreement with the State of California to carry out the development of the proposal.

NOW, THEREFORE, based on the evidence presented to the City Council, including the written staff report, and oral testimony on this matter, the City Council hereby finds, determines and resolves as follows:

**Section 1.** Approves the filing of an application for the Climate, Energy, and Mobility Action Plan in order to become a sustainable community; and

**Section 2.** Certifies that applicant understands the assurances and certification in the application; and

**Section 3.** Certifies that applicant or title holder will have sufficient funds to develop the proposal or will secure the resources to do so; and

**Section 4.** Certifies that the proposal will comply with any applicable laws and regulations; and

**Section 5.** Appoints the City Manager, or designee, as agent to conduct all negotiations, execute and submit all documents including, but not limited to applications, agreements, and payment requests, etc. which may be necessary for the completion of the aforementioned project(s).

[MORE]



**PASSED, APPROVED and ADOPTED** this 21st day of September, 2010.

---

Mayor Jim Dear

ATTEST:

---

City Clerk Helen S. Kawagoe

APPROVED AS TO FORM:

---

City Attorney

