

ORDINANCE NO. _____

AN ORDINANCE OF THE CITY OF COPPELL, TEXAS, AMENDING THE CODE OF ORDINANCES BY AMENDING CHAPTER 3, 'CITY DEPARTMENTS', ARTICLE 3-1, 'WATER DEPARTMENT', SECTION 3-1-12 'WATER CONSERVATION AND DROUGHT CONTINGENCY PLAN'; BY REPEALING SAID SECTION OF SUCH ARTICLE IN ITS ENTIRETY AND REPLACING IT WITH A NEW SECTION 3-1-12, 'DROUGHT CONTINGENCY PLAN AND WATER CONSERVATION PLAN'; PROVIDING SUBCHAPTER A, 'DROUGHT CONTINGENCY PLAN', SUBCHAPTER B, 'WATER CONSERVATION PLAN'; AND SUBCHAPTER C 'GENERAL PROVISIONS'; PROVIDING A REPEALING CLAUSE; PROVIDING A SEVERABILITY CLAUSE; PROVIDING A PENALTY OF FINE NOT TO EXCEED THE SUM OF FIVE HUNDRED DOLLARS (\$500.00) FOR EACH OFFENSE; AND PROVIDING AN EFFECTIVE DATE.

WHEREAS, the City of Coppel believes it will benefit to amend and update the City's Code of Ordinances;

WHEREAS, the City desires to amend the Water Conservation Plan and Drought Contingency Plan previously implemented for the benefit of the citizens of the City of Coppel.

NOW, THEREFORE, BE IT ORDAINED BY THE CITY COUNCIL OF THE CITY OF COPPELL, TEXAS:

SECTION 1. That the Code of Ordinances of the City of Coppel, Texas, be and in the same is hereby amending Chapter 3, 'City Departments', Article 3-1 'Water Department', Section 3-1-12, 'Drought Contingency and Water Conservation Plan', by repealing said section in its entirety and replacing it with new Section 3-1-12, "Water Conservation and Drought Contingency Plan, which shall read as follows:

“CHAPTER 3 – CITY DEPARTMENTS

ARTICLE 3-1. WATER DEPARTMENT

.....

SECTION 3-1-12. DROUGHT CONTINGENCY AND WATER CONSERVATION PLAN

SUBSECTION A. DROUGHT CONTINGENCY PLAN

Sec. 3-1-12A

(1) Declaration of Policy, Purpose, and Intent

In order to conserve the available water supply and protect the integrity of water supply facilities, with particular regard for domestic water use, sanitation, and fire protection, and to protect and preserve public health, welfare, and safety and minimize the adverse impacts of water supply shortage or other water supply emergency conditions, the City of Coppel hereby adopts the following regulations and restrictions on the delivery and consumption of water.

Water uses regulated or prohibited under this Drought Contingency Plan (the Plan) are considered to be non-essential and continuation of such uses during times of water shortage or other emergency water supply condition are deemed to constitute a waste of water which subjects the offender(s) to penalties as defined in Subchapter C, Section I of this Plan.

(2) Public Involvement

Opportunity for the public to provide input into the preparation of the Plan was provided by the City of Coppel by means of the press (official City Newspaper and local and area media, City’s cable access channel), publication in water bill inserts, and on the city website at www.coppelltx.gov.

(3) Public Education

The City of Coppel will periodically provide the public with information about the Plan, including information about the conditions under which each stage of the Plan is to be initiated or terminated and the drought response measures to be implemented in each stage. This information will be provided by means of the press (official City Newspaper and local and area media, City’s cable access channel), publication in water bill inserts, and on the city website at www.coppelltx.gov.

(4) Coordination with Regional Water Planning Groups

The service area of the City of Coppel is located within the Region C Regional Water Planning Group and City of Coppel has provided a copy of this Plan to the Region C Regional Water Planning Group.

(5) Authorization

The City Manager or his/her designee is hereby authorized and directed to implement the applicable provisions of this Plan upon determination that such implementation is necessary to protect public health, safety, and welfare. The City Manager or his/her designee shall have the authority to initiate or terminate drought or other water supply emergency response measures as described in this Plan.

(6) Application

The provisions of this Plan shall apply to all persons, customers, and property utilizing water provided by the City of Coppel. The terms “person” and “customer” as used in the Plan include individuals, corporations, partnerships, associations, and all other legal entities.

(7) Definitions

For the purposes of this Plan, the following definitions shall apply:

Aesthetic Water Use: Water use for ornamental or decorative purposes such as fountains, reflecting pools, and water gardens.

Commercial and Institutional Water Use: Water use which is integral to the operations of commercial and non-profit establishments and governmental entities such as retail establishments, hotels and motels, restaurants, and office buildings.

Conservation: Those practices, techniques, and technologies that reduce the consumption of water, reduce the loss or waste of water, improve the efficiency in the use of water or increase the recycling and reuse of water so that a supply is conserved and made available for future or alternative uses.

Customer: Any person, company, or organization using water supplied by City of Coppel.

Domestic Water Use: Water use for personal needs or for household or sanitary purposes such as drinking, bathing, heating, cooking, sanitation, or for cleaning a residence, business, industry, or institution.

Even Number Address: Street addresses, box numbers, or rural postal route numbers ending in 0, 2, 4, 6, or 8 and locations without addresses.

Industrial Water Use: The use of water in processes designed to convert materials of lower value into forms having greater usability and value.

Landscape Irrigation Use: Water used for the irrigation and maintenance of landscaped areas, whether publicly or privately owned, including residential and commercial lawns, gardens, golf courses, parks, and rights-of-way and medians.

Non-Essential Water Use: Water uses that are not essential nor required for the protection of public, health, safety, and welfare, including:

- (a) Irrigation of landscape areas, including parks, athletic fields, and golf courses, except otherwise provided under this Plan;
- (b) use of water to wash any motor vehicle, motorbike, boat, trailer, airplane or other vehicle;
- (c) use of water to wash down any sidewalks, walkways, driveways, parking lots, tennis courts, or other hard-surfaced areas;
- (d) use of water to wash down buildings or structures for purposes other than immediate fire protection;
- (e) flushing gutters or permitting water to run or accumulate in any gutter or street;
- (f) (use of water to fill, refill, or add to any indoor or outdoor swimming pools or Jacuzzi-type pools;
- (g) use of water in a fountain or pond for aesthetic or scenic purposes except where necessary to support aquatic life;
- (h) failure to repair a controllable leak(s) within a reasonable period after having been given notice directing the repair of such leak(s); and
- (i) use of water from hydrants for construction purposes or any other purposes other than fire fighting.

Odd Numbered Address: Street addresses, box numbers, or rural postal route numbers ending in 1, 3, 5, 7, or 9.

(8) Criteria for Initiation and Termination of Drought Response Stages

The City Manager or his/her designee shall monitor water supply and/or demand conditions on a daily basis and shall determine when conditions warrant initiation or termination of each stage of the Plan, that is, when the specified “triggers” are reached.

The triggering criteria described below are based on previous records and experience in drought conditions in the City of Coppell. The City of Coppell’s water supply is comprised of the service from the Dallas Water Utilities (DWU) and ground storage reservoirs. The basis for triggering criteria will consider thresholds of production capacity in relation to water consumption and monitoring of weather conditions.

Utilization of alternative water sources and/or alternative delivery mechanisms:

The City of Coppell does not currently have an alternate water source.

Stage 1 Triggers – Water Awareness State

(a) Requirements for Initiation

Customers shall be requested to voluntarily conserve water and adhere to the prescribed restrictions on certain water uses, defined in Section VII Definitions. Stage 1 of the Plan shall remain in effect on a year-round basis.

(b) Requirements for Termination

Stage 1 of the Plan shall remain in effect on a year-round basis. There is no termination.

Stage 2 Triggers –Water Watch State

(a) Requirements for Initiation

Customers shall be required to comply with the requirements and restrictions on certain non-essential water uses provided in Section IX of this Plan when one or more of the following conditions occurs:

- 1) Notification is received from DWU requiring implementation of like procedures by wholesale customers.
- 2) Water demands exceed ninety percent (90%) of the current maximum flow rate contracted with DWU for five (5) consecutive days.
- 3) Ground Storage Reservoir levels do not recover for two (2) consecutive days.
- 4) Short-term deficiencies in the City's distribution system limit supply capabilities.

(b) Requirements for Termination

Stage 2 of the Plan shall be rescinded when all of the initiating conditions have ceased to exist for a period of five (5) consecutive days. Upon termination of Stage 2, Stage 1 – Water Awareness State becomes operative.

Stage 3 Triggers – Water Warning State

(a) Requirements for Initiation

Customers shall be required to comply with the requirements and restrictions on certain non-essential water uses for Stage 3 of this Plan when one or more of the following conditions occurs:

- 1) Notification is received from DWU requiring water demand reductions in accordance with contract obligations for wholesale customers.
- 2) Water demands exceed ninety-five percent (95%) of the current maximum flow rate contracted with DWU for five (5) consecutive days.
- 3) Short-term deficiencies in the City's distribution system, such as system outage due to the failure or damage of major water system components, limit supply capabilities.
- 4) Ground Storage Reservoir levels do not recover for three (3) consecutive days.

(b) Requirements for Termination

Stage 3 of the Plan shall be rescinded when all of the initiation conditions have ceased to exist for a period of five (5) consecutive days. Upon termination of Stage 3, Stage 2 – Water Watch State becomes operative unless also rescinded.

Stage 4 Triggers – Water Emergency State

(a) Requirements for Initiation

Customers shall be required to comply with the requirements and restrictions on certain non-essential water uses for Stage 4 of this Plan when one or more of the following conditions occurs:

- 1) Notification is received from DWU requiring water demand reductions in accordance with contract obligations for wholesale customers.
- 2) Water demands exceed one hundred percent (100%) of the current maximum flow rate contracted with DWU for two (2) consecutive days.

- 3) Short term deficiencies in the City's distribution system, such as system outage due to the failure or damage of major water system components, limit supply capabilities.
- 4) Ground Storage reservoir levels do not recover for four (4) consecutive days.

(b) Requirements for Termination

Stage 4 of the Plan may be rescinded when all of the conditions listed as triggering events have ceased to exist for a period of five (5) consecutive days. Upon termination of Stage 4, Stage 3, or the applicable drought response stage based on the triggering criteria, becomes operative.

Stage 5 Triggers – Emergency Water Shortage

(a) Requirements for Initiation

Customers shall be required to comply with the requirements and restrictions for Stage 5 of this Plan when the City Manager, or his/her designee, determines that a water supply emergency exists based on:

- 1) Major water line breaks, or pump or system failures occur, which cause unprecedented loss of capability to provide water service; or
- 2) Natural or man-made contamination of the water supply source(s).

(b) Requirements for Termination

Stage 5 of the Plan shall be rescinded when all of the initiation conditions have ceased to exist. The City Manager will then determine what stage of the Plan should be implemented and the specific water use restrictions required to preserve the City's ability to meet essential water demand and fire protection.

(9) Drought Response Stages

The City Manager or his/her designee, shall monitor water supply and/or demand conditions on a daily basis and, in accordance with the triggering criteria set forth in Section VIII of this Plan, shall determine that a mild, moderate, severe, critical, or emergency water shortage condition exists and shall implement the following notification procedures:

Notification

(a) Notification of the Public:

The City Manager or his/ her designee shall notify the public by means of:

- Web Page - www.coppelltx.gov
- Water Bill inserts
- Direct mail-outs
- Publication in the official City newspaper
- Press releases to local and area media
- City's cable access channel
- Periodic status reports to the City Council on drought response programs, water emergencies and their results.

(b) Additional Notification:

The City Manager or his/ her designee shall notify directly, or cause to be notified directly, the following individuals and entities:

- Members of the City Council
- Fire Chief
- City and/or County Emergency Management Coordinator(s)
- County Judge & Commissioner(s)
- State Disaster District / Department of Public Safety
- TCEQ (required when mandatory restrictions are imposed)
- Critical Water Users (e.g., Hospitals)
- Parks / Street Superintendents & Public Facilities Managers

Stage 1 Response – Water Awareness State

Target: Achieve a voluntary reduction in total gallons per capita per day (GPCD) water use.

(a) **Best Management Practices for Supply Management:**

To manage limited water supplies and/or reduce water demand, the City of Coppell will adhere to the voluntary water use restrictions prescribed herein.

(b) **Voluntary Water Use Restrictions for Reducing Demand:**

- 1) No outside watering between the hours of 10:00 a.m. and 6:00 p.m., except for the use of non-spray irrigation systems and hand watering. The use of non-spray irrigation systems and hand watering will be allowed at all times in Stage 1.
- 2) City will encourage water conservation by increasing awareness of Water Conservation techniques through the use of various available means including but not limited to: web page, direct mail-outs, water bill inserts, cable access channel, press releases or other means available to advise the public of the requirements of this ordinance.

Stage 2 Response – Water Watch State

Target: Achieve a 2 percent reduction in total GPCD water use.

(a) **Best Management Practices for Supply Management:**

To manage limited water supplies and/or reduce water demand, the City of Coppell will:

- 1) The City must conduct all watering of center medians of streets, street rights-of-way, parks, City facilities and other areas maintained by the City on Mondays, Wednesdays and Fridays.

(b) **Stage 2 Water Use Restrictions for Demand Reduction:**

Under threat of penalty for violation, the following water use restrictions shall apply to all persons:

- 1) Residential water customers south of Sandy Lake Road must conduct all watering on Sundays, Tuesdays and Thursdays.

- 2) Residential water customers north of Sandy Lake Road must conduct all watering on Saturdays, Tuesdays and Thursdays.
- 3) Non-residential water customers must conduct all watering on Mondays, Wednesdays, and Fridays.
- 4) Schools must conduct all watering of School sites, School facilities and other areas maintained by the Schools on Mondays, Wednesdays, and Fridays.
- 5) Homeowners Associations or Commercial Property Owners Associations must conduct all watering of common property on Mondays, Wednesdays, and Fridays.
- 6) No watering, other than by non-residential users, the City, Schools, and/or HOA' s/POA's will be allowed on Mondays, Wednesdays and Fridays without an approved variance.
- 7) Nursery (garden and landscape) businesses are not restricted when watering business inventory; however, they must comply with watering requirements for the landscaping associated with the building.
- 8) No outside watering will be allowed between the hours of 10:00 a.m. and 6:00 p.m. with the exception of the use of non-automatic spray irrigation system and hand watering which will be allowed all days, at all times. Use of non-spray irrigation systems and hand watering will be allowed all days.

Stage 3 Response – Water Warning State

Target: Achieve a 5 percent reduction in total GPCD water use.

(a) **Best Management Practices for Supply Management:**

To manage limited water supplies and/or reduce water demand, the City of Coppell will:

- 1) The City must conduct all watering of center medians of streets, street rights-of-way, parks, City facilities and other areas maintained by the City on Mondays and Fridays.

(b) **Water Use Restrictions for Demand Reduction:**

All requirements of Stage 2 shall remain in effect during Stage 3 except:

- 1) Residential water customers south of Sandy Lake Road must conduct all watering on Sundays and Thursdays.
- 2) Residential water customers north of Sandy Lake Road must conduct all watering on Saturdays and Tuesdays.
- 3) Non-residential water customers must conduct all watering on Mondays and Fridays.
- 4) Schools must conduct all watering of School sites, School facilities and other areas maintained by the Schools on Mondays and Fridays.
- 5) Homeowners Associations or Commercial Property Owners Associations must conduct all watering of common property on Mondays and Fridays.
- 6) No watering, other than by non-residential users, the City, Schools, and/or HOA's/POA's will be allowed on Mondays and Fridays without an approved variance.
- 7) No watering will be allowed on Wednesdays, with the exception of non-spray irrigation systems, which will be allowed all days. Hand watering is restricted to the two allowed days.
- 8) Nursery (garden and landscape) businesses are not restricted when watering business inventory; however, they must comply with watering requirements for the landscaping associated with the building.
- 9) In a Stage 3 Water Warning State, persons should contact the City Engineer's office prior to installing new landscaping to determine if a variance will be considered. As a general rule, no variance will be allowed during a Stage 3 Water Warning State. The City Engineer or designee, in a Stage 3 Water Warning State may revoke approved variances, if deemed necessary to preserve the City's ability to supply essential water demands and fire protection.
- 10) No outside watering will be allowed between the hours of 10:00 a.m. and 6:00 p.m. with the exception of the use of non-automatic spray irrigation system which will be allowed all days, at all times. Hand watering will be restricted to the two allowed days.

Stage 4 Response – Water Emergency State

Target: Achieve a 15 percent reduction in total GPCD water use.

(a) **Best Management Practices for Supply Management:**

To manage limited water supplies and/or reduce water demand, the City of Coppel will:

- 1) The City must conduct all watering of center medians of streets, street rights-of-way, parks, City facilities and other areas maintained by the City on Wednesdays.

(b) **Water Use Restrictions for Reducing Demand:**

All requirements of Stage 2 and 3 shall remain in effect during Stage 4 except:

- 1) Residential water customers south of Sandy Lake Road must conduct all watering on Sundays.
- 2) Residential water customers north of Sandy Lake Road must conduct all watering on Saturdays.
- 3) Non-residential water customers must conduct all watering on Wednesdays.
- 4) Schools must conduct all watering of School sites, School facilities and other areas maintained by the Schools on Wednesdays.
- 5) Homeowners Associations or Commercial Property Owners Associations must conduct all watering of common property on Wednesdays.
- 6) No watering, other than by non-residential users, the City, Schools, and/or HOA's/POA's will be allowed on Wednesdays.
- 7) No watering will be allowed on Mondays, Tuesdays, Thursdays and Fridays, with the exception of non-spray irrigation systems, which will be allowed all days. No outside watering will be allowed between the hours of 10:00 a.m. and 6:00 p.m. with the exception of the use of non-automatic spray irrigation system which will be allowed all days, at all times. Hand watering is restricted to the one allowed day.
- 8) Nursery (garden and landscape) businesses are not restricted when watering business inventory; however, they must comply with watering requirements for the landscaping associated with the building.

- 9) In a Stage 4 Water Emergency State, persons should refrain from installing new landscaping. No variance for watering more than one day per week will be allowed during a Stage 4 Water Emergency State. The City Engineer or designee, in a Stage 4 Water Emergency State will revoke any variances approved during the Stage 3 Water Warning State.

Stage 5 Response – Emergency Water Shortage

Target: Achieve a 20 percent reduction in total GPCD water use.

(a) **Best Management Practices for Supply Management:**

To manage limited water supplies and/or reduce water demand, the City of Coppel will:

- 1) Activate and use an alternative supply source(s); if available.
- 2) Discontinue all non-essential water use, including landscape irrigation water use.
- 3) Door hangers will be placed on all houses in the affected area providing information about the conditions.

(b) **Water Use Restrictions for Reducing Demand:**

All requirements of Stage 2, 3, and 4 shall remain in effect during Stage 5 except:

- 1) No outdoor watering will be allowed.

SUBCHAPTER B. WATER CONTINGENCY PLAN

Sec. 3-1-12B

There is hereby adopted the Water Conservation Plan of the City, dated May 21, 2019, and made a part hereof for all purposes, the same as if fully copied in full herein, including any appendices.

SUBCHAPTER C. GENERAL PROVISIONS

Sec. 3-1-12C

(1) Enforcement

- (a) No person shall knowingly or intentionally allow the use of water from the City of Coppell for residential, commercial, industrial, agricultural, governmental, or any other purpose in a manner contrary to any provision of this Plan, or in an amount in excess of that permitted by the drought response stage in effect at the time pursuant to action taken by City Manager, or his/her designee, in accordance with provisions of this Plan.
- (b) Any person who violates this Plan is guilty of a misdemeanor and, upon conviction shall be punished by a fine not to exceed the sum of Five Hundred Dollars (\$500.00). Each day that one or more of the provisions in this Plan is violated shall constitute a separate offense. If a person is convicted of three or more distinct violations of this Plan, the City Manager, or his/her designee, shall, upon due notice to the customer, be authorized to discontinue water service to the premises where such violations occur. Services discontinued under such circumstances shall be restored only upon payment of a re-connection charge, hereby established at \$20.00, and any other costs incurred by the City of Coppell in discontinuing service. In addition, suitable assurance must be given to the City Manager or his/her designee that the same action shall not be repeated while the Plan is in effect. Compliance with this plan may also be sought through injunctive relief in the district court.
- (c) Any person, including a person classified as a water customer of the City of Coppell, in apparent control of the property where a violation occurs or originates shall be presumed to be the violator, and proof that the violation occurred on the person's property shall constitute a rebuttable presumption that the person in apparent control of the property committed the violation, but any such person shall have the right to show that he/she did not commit the violation. Parents shall be presumed to be responsible for violations of their minor children and proof that a violation, committed by a child, occurred on property within the parents' control shall constitute a rebuttable presumption that the parent committed the violation, but any such parent may be excused if he/she proves that he/she had previously directed the child not to use the water as it was used in violation of this Plan and that the parent could not have reasonably known of the violation.

- (d) Any employee of the City of Coppell, police officer, or other City of Coppell employee designated by the City Manager, or his/her designee, may issue a citation to a person he/she reasonably believes to be in violation of this Ordinance. The citation shall be prepared in duplicate and shall contain the name and address of the alleged violator, if known, the offense charged, and shall direct him/her to appear in the City of Coppell Municipal Court on the date shown on the citation for which the date shall not be less than 3 days nor more than 5 days from the date the citation was issued. The alleged violator shall be served a copy of the citation. Service of the citation shall be complete upon delivery of the citation to the alleged violator, to an agent or employee of a violator, or to a person over 14 years of age who is a member of the violator's immediate family or is a resident of the violator's residence. The alleged violator shall appear in City of Coppell Municipal Court to enter a plea of guilty or not guilty for the violation of this Plan. If the alleged violator fails to appear in municipal court, a warrant for his/her arrest may be issued. A summons to appear may be issued in lieu of an arrest warrant. These cases shall be expedited and given preferential setting in City of Coppell Municipal Court before all other cases.

(2) Variances

The City Manager, or his/her designee, may, in writing, grant temporary variance for existing water uses otherwise prohibited under this Plan if it is determined that failure to grant such variance would cause an emergency condition adversely affecting the health, sanitation, or fire protection for the public or the person requesting such variance and if one or more of the following conditions are met:

- (a) Compliance with this Plan cannot be technically accomplished during the duration of the water supply shortage or other condition for which the Plan is in effect.
- (b) Alternative methods can be implemented which will achieve the same level of reduction in water use.

Persons requesting an exemption from the provisions of this Ordinance shall file a petition for variance with the City of Coppell within 5 days after the Plan or a particular drought response stage has been invoked. All petitions for variances shall be reviewed by the City Manager, or his/her designee, and shall include the following:

- (a) Name and address of the petitioner(s).
- (b) Purpose of water use (only consideration will be for new lawns or landscaping).

- (c) Specific provision(s) of the Plan from which the petitioner is requesting relief.
- (d) Detailed statement as to how the specific provision of the Plan adversely affects the petitioner or what damage or harm will occur to the petitioner or others if petitioner complies with this Ordinance.
- (e) Description of the relief requested.
- (f) Period of time for which the variance is sought.
- (g) Alternative water use restrictions or other measures the petitioner is taking or proposes to take to meet the intent of this Plan and the compliance date.
- (h) Other pertinent information.”

SECTION 2. It is hereby declared to be the intention of the City of Coppell that the sections, paragraphs, sentences, clauses, and phrases of this Article are severable and, if any phrase, clause, sentence, paragraph, or section shall be declared unconstitutional by the valid judgment or decree of any court of competent jurisdiction, such unconstitutionality shall not affect any of the remaining phrases, clauses, sentences, paragraphs, and sections.”

SECTION 3. That all provisions of the ordinances of the City of Coppell in conflict with the provisions of this ordinance be and the same are hereby repealed and any provisions not so in conflict shall remain in force and effect.

SECTION 4. That should any sentence, paragraph, subdivision, clause, phrase or section of this ordinance be adjudged or held to be unconstitutional, illegal or invalid, the same shall not effect the validity of this ordinance as a whole, or any part or provision thereof other than the part so decided to be invalid, illegal or unconstitutional, and shall not effect the validity of the Code of Ordinances as a whole.

SECTION 5. That any person, firm or corporation violating any of the provisions or terms of this ordinance shall be subject to the same penalty as provided for in the Code of Ordinances of the City of Coppell, as heretofore amended, and upon conviction shall be punished by a fine not to exceed the sum of Five Hundred Dollars (\$500.00) for each offense; and each and every day such violation shall continue shall be deemed to constitute a separate offense.

SECTION 6. This ordinance shall take effect immediately upon its passage and the publication of the caption as the law and charter in such cases provide.

DULY PASSED by the City Council of the City of Coppell, Texas, on the _____ day
of _____ 2019.

APPROVED:

Karen Selbo-Hunt

ATTEST:

Christel Pettinos, City Secretary

APPROVED AS TO FORM:

Robert E. Hager, City Attorney