



## *Los Angeles County Sober Living Coalition*

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**Date:** December 17, 2010

**To:** Los Angeles County Planning Commissioners, Alan Bell, Tom Rothmann, and Deputy City Attorney Amy Brothers

**From:** Jeff Christensen, Project Director, Los Angeles County Sober Living Coalition

**Attachments:** Ordinance 2009-02, An Uncodified Ordinance of the Town of Truckee Regulating the Placement and Permitting of Group and Transitional Housing.

**Re:** Proposed Boarding House Ordinance: Case Number CPC-2009-800-CA and Council File Number 07-34-27

At the November 4, 2010, Los Angeles City Planning Commission hearing on the proposed Boarding House ordinance, Commissioners specifically requested input on the following three sets of issues:

- (1) What specific parts of the ordinance would seriously and negatively impair the ability of sober living homes to continue operating, which for sober living is the single lease requirement?
- (2) What case law and other policy issues would help guide the city in its decision making; and
- (3) A description of the continuum of recovery from addiction and how sober living fits into this continuum.

The Los Angeles County Sober Living Coalition (LACSLC) has about 200 homes within the City of Los Angeles. LACSLC is a member of the Sober Living Network which has over 500 member homes in Southern California. Both organizations believe our member homes are being put in great peril by this proposed ordinance so we are presenting information in this letter to Planners, Commissioners and the City Attorney's office that addresses these issues.

### **Section 1: Why a Single Lease Requirement is a Problem for Sober Living Homes**

Following are reasons the single lease requirement would impair the ability of quality sober living homes to exist in the neighborhoods of their choice.

#### **A. Members of sober living families need and expect more than secure tenancy.**

Leases relate only to the privileges and responsibilities attendant to a dwelling and property. People who seek residence in sober living homes do so for the safety and recovery support they receive there. Homes maintain a recovery-centric environment in part through a set of behavioral requirements with which residents agree to comply as a condition of acceptance



into the family. The principal but by no means only requirement is that of abstinence from alcohol and drugs. Sober living homes typically address other behavioral rules in individual agreements with residents, such as always exhibiting good citizenship inside and outside of the home. Residents understand that adherence to these rules is a condition of residence privileges, and that they may be asked to leave as a result of violating them.

It makes no sense to require one lease for all residents. If a resident must be evicted under such an agreement all residents must be evicted.

**A. Multiple leases ensure the maintenance of a safe and healthy living environment.**

A home must be able to remove disruptive or substance abusing residents from the home for the safety of the other residents and the safety of the neighborhood. Traditional families are often faced with the same painful necessity of asking spouses or adult children to move out because they create similarly harmful conditions for other family members. Our experience shows us that our member homes with their individual agreements do an efficient job of removing problem residents than do related families living in the same neighborhoods as our member homes.

Furthermore, it cannot be stated enough that the City of Los Angeles has yet to provide justification that homes in which residents have multiple leases are a bigger threat to community health and safety than are homes without multiple leases. Why this is important will be further addressed in Section 2: Case Law.

**B. The means which families employ for equitable sharing of household expenses is not central to their rights to live together as a family.**

The test imposed by the ordinance is defended by the City in part by a letter issued by the California Attorney General in 2003 regarding what can be considered boarding houses. The letter references the California Supreme Court decision in *City of Santa Barbara v. Adamson*, in which the court ruled that cities cannot define family differently for related persons than for non-related persons. However, this AG opinion relates to an ordinance from the City of San Luis Obispo, a city that did not, in its definition of boarding house, change the definition of family to exclude people who live together with multiple leases as the City of Los Angeles proposes to do. Neither does the AG opinion suggest that separate financial agreements trump *Adamson's* definition of family. Additionally, the AG opinion applied to commercial use and a sober living home is not considered commercial use. Further, it is simply an advisory opinion, not a ruling.

We strongly disagree that the existence of separate agreements defines a boarding house when other *Adamson* tests of family are met. The residents of the *Adamson* household had multiple payment arrangements for meeting their household expenses as do the residents in our sober living homes.



**C. Requiring a single lease will not address in any satisfactory fashion the problems the city wishes to eradicate.**

Homes that violate nuisance abatement laws already do not follow the law. If they did they wouldn't be problems. What does it matter to them what new requirement the City might enact, regardless of whether the occupants of these homes live there under one lease or multiple leases?.

Recently there was a case in the news in which an unscrupulous person took possession of a vacant home. He crammed many people into this residence with no leases whatsoever, and did so with no rights to the property. Yet the City was able, within the past few weeks, to shut down that house along with two more problem student rental homes and did so using existing policy. None of these homes were sober living homes. Why do we need another regulation when the existing ones seemed to work fine for closing down problem homes when the City decides to apply its resources?

One thing was highlighted in citizen testimony before the Commission and in several community meetings conducted by the Planning staff—much of the behavior which was the subject of neighbor complaints shouldn't be tolerated in **any** neighborhood. The City claims that homes with multiple leases are nuisances, with no evidence whatsoever to support this claim. Even if that were true, why then would the City not want to deal directly with specific problem behaviors and why does the City want to pass on those perceived problems to less affluent and more densely populated residential neighborhoods?

**D. This ordinance would eradicate existing group homes for persons with disabilities.**

The vast majority of group homes for persons with disabilities are located within low density residential zones, and these are homes that use individual leases per resident. This ordinance would force the relocation of thousands of people now living in them. Los Angeles County Sober Living Coalition member homes in the City of Los Angeles total just under 200 with approximately 2,000 persons residing in them. Best estimates are that LACSLC member homes make up only a quarter of existing sober living homes in the city, so this ordinance would potentially relocate, conservatively, around 7000 people just from sober living. Furthermore, there is an undetermined number of independent living group homes for the mentally ill that are not protected from this ordinance by the state Mental Health Services Act. Other populations of disabled persons also live in group homes with individual leases.

As you will note in Section 2, Case Law of this document, in many fair housing cases the courts have ruled that low density residential zones are where these homes need to be located.

**Section 2: Federal Fair Housing Case Law, State of California Case Law, Other Policy Issues**

**A: Federal Fair Housing:** We're providing a few illustrative cases to support our points from a much larger body of case law that we suggest that the City of Los Angeles examine more extensively.

Following are a few examples that apply to both intentional discrimination and discrimination through disparate impact. The City of Los Angeles cannot hide behind a defense of a seemingly facially neutral



ordinance in the wake of its well-documented intent to restrict group homes for sober living and other disabled populations. The material generated from Councilmember Greig Smith's office and the first two drafts of the ordinance (matters of public record, but pulled from the agenda prior to scheduled Planning Commission hearings) clearly document this intent. This current attempt at a facially neutral ordinance is merely a pretext for this intent to limit where these group homes—especially sober living—can be located in the City. Changing the definition of family in a way that doesn't allow group homes with multiple leases to exist in low density residential zones is discriminatory.

**Case 1:** In the case of *Oxford House v. Township of Cherry Hill*, 799 F. Supp. 450 (D. N.J. 1991), the federal court rejected a state court ruling that residents of a group home for recovering alcoholics were not a single family under the Township's ordinance. The court noted that those handicapped by alcoholism or drug abuse are persons more likely than others to need a living arrangement in which sufficiently large groups of unrelated people live together in residential neighborhoods for mutual support. Furthermore, the Township produced no evidence of non-discriminatory reasons for its position.

**Cases 2 & 3:** *Horizon House Dev. Serv., Inc. v. Township of Upper Hampton*, 804 F. Supp. 683 (E.D. Pa. 1992) and in *Sharpvisions, Inc. v. Borough of Plum*, 475 F. Supp. 2d 514, 523-524 (W.D. Pa. 2007), the courts found finding that enforcement of the "group home" ordinance constitutes disparate treatment where the Borough refused to treat the Sharpvisions residents as a family.

**Case 4:** The Court in *Dr. Gertrude A. Barber Ctr., Inc. v. Peters Twp.*, 273 F. Supp. 2d 643, 655-657 (W.D. Pa. 2003) Groups of unrelated disabled persons in the City of Gainesville could only live in a general business zone by right. The court found such a statutory scheme to be facially invalid, and to have a disparate impact on groups of disabled persons seeking single family housing.

**Case 5:** In the case of *United States v. Borough of Audubon*, 797 F. Supp. 353 (D.N.J. 1991) aff'd 968 F.2d 14 (3d Cir. 1992) the court sanctioned the Borough and permanently enjoined it from interfering with the living arrangements of the residents of the home [for a disabled population] and held that when acts are undertaken with improper discriminatory motive, the Act may be violated even though those acts may have otherwise been justified under state law.

We suggest that the City more thoroughly research fair housing reasonable accommodation case law. Should this new definition of family become policy for the City there will be a flood of reasonable accommodation applications. The City will need to establish policies that suspend any application code violations to sober living homes until the reasonable accommodation has been completed. These will be in addition to direct legal challenges.

We would like to remind everyone that the City of Newport Beach, erroneously held by many to have enacted a successful policy for limiting sober living homes, has yet to win a case. Furthermore, it has paid out nearly three million dollars in settlement costs and legal fees. Settlements are not legal precedents.



**B: California State Law—Definition of Family, *City of Santa Barbara v. Adamson*.** The City has still not justified how it is able to ignore the provisions of this 1980 California Supreme Court decision in which the court ruled that no local government can define family differently for non-related persons than it does for related persons. The City has yet to address how, in light of *Adamson*, it can justify its proposed redefinition of family and single housekeeping unit that severely restricts the way unrelated people can live together in low density residential areas, since the principal means for this type of shared housing is through multiple leases or other individual financial arrangements.

The City refers to the Attorney General’s opinion regarding *Adamson* and the City of Lompoc’s boarding house ordinance. However, Lompoc did not redefine family in its ordinance in ways that exclude shared living arrangements in group homes for unrelated persons the way the City of LA has done. Furthermore, the AG’s opinion is just that—opinion. It is not a legal ruling.

### C. Policy Issues

- **Truckee Ordinance: The Truckee ordinance has a separate policy for sober living and does not categorize sober living or other group homes as Boarding Houses.**
  - LA City Planning staff have publicly stated that the City’s proposed ordinance was drafted in part based on the Truckee, California ordinance. We find this quite odd. Here’s why. Attached is a copy of the most current Truckee **Ordinance 2009-02, An Uncodified Ordinance of the Town of Truckee Regulating the Placement and Permitting of Group and Transitional Housing**. Please note the following section on page 2 relevant to sober living:

**“Section 3 Transitional and Group Homes not licensed by the State and/or serving seven or more clients—Use Permit Required:**

Any transitional or group home or similar facility determined by the Community Development Director located within the Town which services seven or more persons, and/or is not licensed to operate by the State of California shall obtain a use permit for its operation with written notice to adjoining properties and the imposition of appropriate conditions of approval as authorized by the Town Development Code Chapter 18 76 unless otherwise prohibited by the Development Code.”

Three people, two sober living homes owners and Deborah Parker, recently contacted the Town of Truckee Community Development Department. They identified themselves as sober living home providers or advocates for same, stating that they wanted to clearly understand what regulations an eight bed sober living home proposing to locate in a Town of Truckee single family residential zone would be subject to. In all three instances, they were referred to the above referenced ordinance. When asked specifically if they would be classified as a boarding house they were told no. City officials further explained that they enacted this 2009 ordinance to deal specifically with sober living homes.



[Please note that this Town of Truckee ordinance would not prevail if this ordinance were challenged by a provider, which has not yet occurred. Volumes of case law and research by the City of Los Angeles Planning Department and documented in the January 28, 2010 Staff Report confirms that such measures cannot meet the legal challenge.]

▪ **Legal Challenges:**

- If this ordinance passes, the City of Los Angeles will face legal challenges to it.
- Fair housing laws require that local governments which enact policies restricting access to housing for persons with disabilities must demonstrate that these policies are necessary. *Such evidence is to be objective and applied equally across the entire jurisdiction* that clearly demonstrates that (in this case) housing with multiple leases are more of a threat to community health and safety than housing with no more than one lease. The City has offered no such evidence. NIMBY complaints are not accepted by the courts as justification for such ordinances. Discriminatory motive has been noted in the preceding sample case law section.
- Members of the Planning Commission have posited that this ordinance might be offered to counter failed enforcement of nuisance abatement laws by the City. Sober living homes and many neighbors strongly agree that the City has not done its job in proper nuisance abatement. However, as was pointed out Section 1, part D of this document, the City can if it applies its resources.
- The homes that neighbors say generate most of their complaints do not appear to be legitimate group homes for persons with disabilities, yet they are often referred to as sober living homes. However, what neighbors call sober living we sober living providers would call party houses, crack houses or flop houses.

## Section 3: Continuum of Addiction Recovery

### A. Background

Medical authorities agree that addiction is a bona fide disease, a complex one which is in the relapsing/remitting category of health problems. As with other relapsing/remitting diseases such as diabetes, heart disease, and COPD (chronic obstructive pulmonary disease) addiction is a complex condition, having both acute and chronic components. All relapsing/remitting diseases develop in stages. Successful intervention is rarely if ever achieved solely by single brief interventions of clinical treatment however intense.

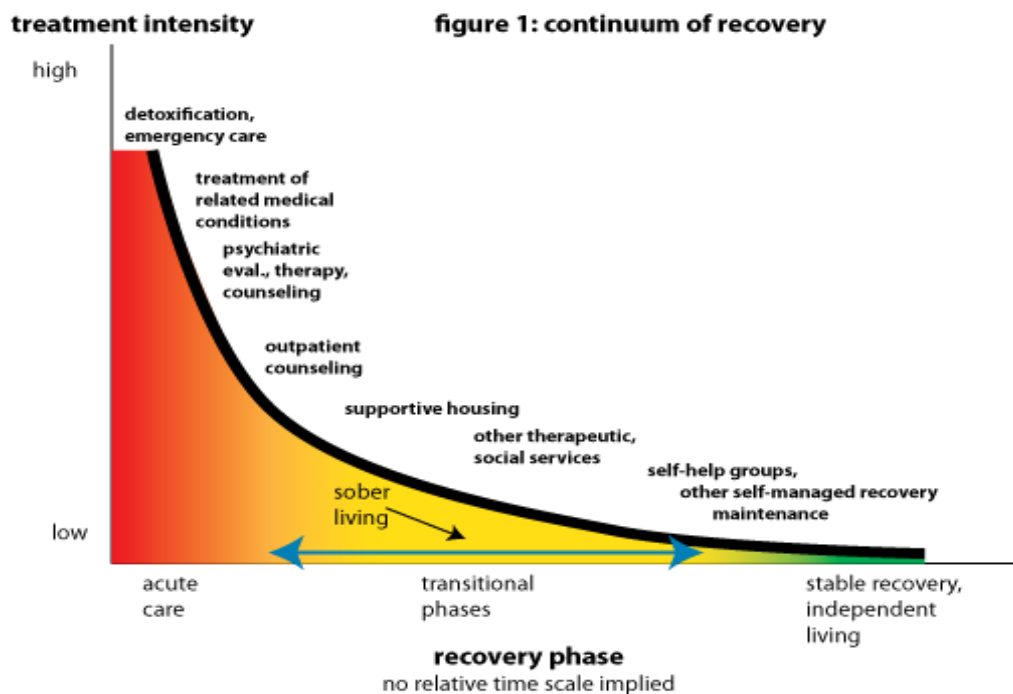
In all of these diseases the combination of genetics, learned family behaviors, and environmental factors culminating over time contribute to the onset and perpetuation of the disease. In the past few decades there has been an increasing amount of public dialogue about known contributory factors. For instance, smoking and pollution are primary causes of COPD and lung cancer, as well as contributory to heart disease. An increase in a high sugar and high fat diet contribute as well, coupled with a decline in exercise. And, of course, these also are chief culprits in Type II diabetes development. Understanding the conditions surrounding these diseases has lead to increased public policy considerations and decisions that have lead to policies that begin to address these factors.



Medical professionals emphasize that relapse is a key component of all relapsing/remitting diseases. Successful treatment and recovery is a process which occurs over time. For all relapsing/remitting diseases, detection, intervention and recovery require support of family, friends and community. Health experts state that approximately two thirds of persons with alcohol and drug addiction have a good chance of recovery and leading normal lives. This is the same percentage of those with other relapsing/remitting diseases who are able to successfully manage their conditions.

Those are also important factors for recovery from addiction, but the primary factor is strong peer support and a healthy alcohol and drug free environment in which residents model and support good citizenship. Those who do not bond and associate with others in recovery have a very poor chance of maintaining recovery.

A services delivery concept known as the continuum of recovery describes how different services and living environments are appropriate depending on an individual's condition upon entering recovery, and progression through recovery stages. Figure 1 (below) is an illustration of the basic idea.



Time spent in phases of recovery is a variable across individuals, as noted above. These are some typical durations of recovery phases. Note that more than one treatment or recovery support service may be utilized by an individual at the same point in time (e.g. outpatient care and sober living):

<u>Phase</u>	<u>Time in Phase</u>
Detox (only needed for 20%)	2-5 days
Evaluation and Treatment –Residential	30 days
Evaluation and Treatment—Outpatient (12-16 hrs/week)	8-12 weeks
Supportive Housing	1-3 years
Other supportive services (mental health, job training, medical)	1-5 years
Peer support, self help groups and peer contacts	Ongoing



## **B. Brief overview of sober living and its role in recovery**

“Treatment” with respect to substance abuse is a widely misunderstood and misused term. Many not familiar with recovery from addiction believe that formal treatment is essential for recovery but that is not accurate. It is healthy peer interaction that is the most essential component. A substantial number of people who have been clean and sober for years never received formal treatment. Their primary means of recovery began with peer-based services such as twelve step programs or introduction to sober housing where they are introduced to other programs. Unlike many types of mental illnesses, individuals with addiction and other substance use disorders can and do actually recover without further treatment.

While “treatment” accurately describes the majority of mental health services, it fails to accurately describe the recovery process from addiction, chemical dependency and other substance use disorders. In this document, “treatment” for these disorders refers only to a small and resource-intensive phase of the recovery process that many alcoholics and addicts do not require. It is not the proper term to describe the majority of an individual’s recovery process, nor is it an accurate characterization of the majority of the services recovering individuals participate in through the continuum of recovery.

Sober living homes provide housing and supportive environments and resources to people in recovery from addiction. Sober living has been an integral part of recovery since the first successful model for addressing addiction, Alcoholics Anonymous, was created in 1934. For two and a half decades, as the numbers of recovering people exploded, the only means for recovery were AA meetings and informal sober housing established by recovering people for others in recovery. It was and still is an essential component of recovery for many people.

Increasing cuts to existing treatment programs continue to reduce the number of treatment services and the residential capacity available, making the maintenance of sober living homes in our residential communities essential to health for alcoholics and addicts and safety for all communities.

Because of the different ways people enter sober living, and the variety of physical, psychological and emotional damage they may have suffered from their families of origins and as a result of their drug use, the length of stay in a sober living environment is indeterminate. It is neither permanent nor transient and generally is determined by how long the resident requires the environment that meaningfully supports them in making progress toward independent living. At times this support may direct them to a structured treatment for a while after which they can return to sober living. What’s more, it’s often impossible to determine upon entry into sober living how long someone may want or need to remain there.

Many sober living residents express that this is the first time they have experienced a healthy family environment. The reason for this is that while addicted individuals make up between 10-15% of the general population, more than 50% come from families with addiction disorders. Many recovering people not only have to learn to manage their disease but learn a whole new set of values, unlike those with other relapsing/remitting disorders.

The family characteristics of sober living homes are important for several reasons. Residents learn values of trust and self-esteem through such simple things as sharing household responsibilities and being accountable to others. Due to the fact that many alcoholics and addict are products of dysfunctional families of origin, they derive an additional benefit of learning cooperative living skills which they never acquired growing up. Peer reviewed research also shows that members of sober living families develop bonds which in many cases are stronger and healthier than bonds with families of origin or with others developed prior to beginning the recovery process.





### C. What does this mean for the City of Los Angeles?

Based on national data, about 9% of adults had a treatable substance abuse disorder in 2009.<sup>1</sup> Based on population, these data suggest that over 280,000 Los Angeles residents similarly suffer. These results are remarkably similar year after year, despite current levels of spending of all kinds on prevention and remediation.

As bad as the problem is, only a fraction of those people receive help. Based on a related 2008 study<sup>2</sup>, only about 17,000 adult Angelenos received any licensed treatment for their addiction. The vast majority did not. Since sober living is not treatment, its residents are not captured in the statistics about the recovery services people receive. As noted above, many of those in both the “received treatment” and “did not receive treatment” categories of individuals with substance abuse problems find recovery support in sober living.

The results derived from living in a good sober living home are remarkable. In a peer reviewed two-year study conducted by researchers at DePaul University<sup>3</sup>, 150 individuals in Illinois were randomly assigned to either sober living or to outpatient treatment and self-help groups. At a two-year follow-up point, the sober living population exhibited significantly lower substance use (31.3% vs. 64.8%), significantly higher monthly income (\$989.40 vs. \$440.00 [*Illinois, 1996 dollars*]), and significantly lower incarceration rates (3% vs. 9%).

These results, across a population of over 2,000 recovering alcoholics and addicts in Sober Living Coalition homes in the City of Los Angeles, suggest significant benefits to the City and to its communities provided by well-managed sober living homes, assuming the City permits these homes and their residents to exist there.

We would be glad to have further discussions with you on any of these subjects.

Sincerely,

Jeff Christensen, Project Director  
Los Angeles County Sober Living Coalition

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<sup>1</sup> Substance Abuse and Mental Health Services Administration. (2010). Results from the 2009 National Survey on Drug Use and Health: Mental Health Findings (Office of Applied Studies, NSDUH Series H-39, HHS Publication No. SMA 10-4609). Rockville, MD.

<sup>2</sup> Metro Brief, Substance Abuse Treatment in Metropolitan Areas, U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES, Substance Abuse and Mental Health Services Administration, Office of Applied Studies (2008), [http://oas.samhsa.gov/metro/LosAngeles/508PDF\\_LosAngeles.pdf](http://oas.samhsa.gov/metro/LosAngeles/508PDF_LosAngeles.pdf)

<sup>3</sup> See *Communal Housing Settings Enhance Substance Abuse Recovery*, Leonard A. Jason, Olson, B., Ferrari, J, American Journal of Public Health, Vol. 95, No. 10, October 2006 for research findings summary and complete citations.

**TOWN OF TRUCKEE**  
California

**ORDINANCE 2009-02**

**AN UNCODIFIED ORDINANCE OF THE TOWN OF TRUCKEE REGULATING THE  
PLACEMENT AND PERMITTING OF GROUP AND TRANSITIONAL HOUSING**

The Town Council of the Town of Truckee does hereby ordain as follows

**Section 1** Recitals

- A The State of California has established a regulatory structure for various types of group and transitional housing designed to encourage community based treatment of persons with impairments
- B That structure effectively prohibits local regulation of certain types of such housing, allows limited regulation of other types of such housing and full local regulation of other types
- C The mandate for such housing and the state regulatory framework must, to the extent legally possible, be administered in a manner consistent with protection of single family neighborhoods within the Town from inappropriate land use
- D The proper forum for a reconciliation of those two goals is the update of the housing element of the General Plan now underway
- E Pending adoption of a new housing element the Town Council wishes to adopt interim regulations governing transitional and group homes
- F Review of ordinances and policies adopted by other California cities and public testimony received when additional transitional housing was proposed within the Town has resulted in the Town Council determining that reasonable spacing requirements between the various types of such housing should be imposed to obtain compatibility with other residential land uses The adopted spacing requirements are generally consistent with those imposed by the state on licenses it issues for transitional and group homes to avoid overconcentration of such uses and the adverse effects of such overconcentration on surrounding neighborhoods
- G It is the express intent of the Council in adopting this ordinance that it shall not apply to rooming or boarding houses as defined by the Town Development Code, those uses will be regulated by the applicable Development Code provisions

**Section 2** Group and Transitional Housing where local regulation is effectively preempted by the State of California Filing of Neighborhood Information Statement required

The State of California has, by statute mandated that the following types of group or transitional housing be considered a residential use for which no additional permitting can be required when serving six or fewer persons or operating under state license

- Intermediate Care Facility/Developmentally Disabled Habilitative
- Immediate Care Facility/Developmentally Disabled – Nursing
- Congregate Living Health Facility
- Residential Care Facility – Medical
- Residential Care Facility for the Elderly
- Pediatric Day Care Facilities
- Alcohol/Drug Abuse Recovery or Treatment Facilities

Any of the above uses which is operating within the Town from and after the effective date of this ordinance, shall file with the Town a written statement regarding the nature of the facility the number of clients served, the hours of operation, and a copy of any state license or grant funding agreement relating to the use and operation of the facility The neighborhood information statement shall be a public record available for inspection by any interested person(s) during regular Town business hours

**Section 3** Transitional and Group Homes not licensed by the State and/or serving seven or more clients – Use Permit Required

Any transitional or group home or similar facility as determined by the Community Development Director located within the Town which serves seven or more persons, and/or is not licensed to operate by the State of California shall obtain a use permit for its operation with written notice to adjoining properties and the imposition of appropriate conditions of approval as authorized by Town Development Code Chapter 18 76 unless otherwise prohibited by the Development Code

**Section 4** Spacing and Distance Requirements for Sober Living and Parolee Homes and other Transitional and Group Housing

No sober living home or similar facility as determined by the Community Development Director serving six or fewer clients as defined by state law shall locate or operate within three hundred (300) feet of any other sober living house or other group or transitional housing use No parolee home serving six or fewer clients as defined by state law shall locate or operate within one thousand (1,000) feet of any other parolee home or other group or transitional housing use

Any sober living or parolee home or similar facility as determined by the Community Development Director serving seven or more clients must obtain a use permit under Chapter 18 76 of the Town Development Code and spacing requirements, if any shall be determined through that process

**Section 2** This Ordinance will take effect thirty days following its second reading as set forth in Town Development Code Chapter 18 03 020 G2 if conflicts exist between this ordinance and the Development Code the most restrictive provision of the two shall apply

**Section 3** Summary Publication This ordinance or a summary thereof shall be published in a newspaper of general circulation according to State requirements

**Section 4** If any provision of this ordinance or the application thereof to any person or circumstance is held invalid, the remainder of the ordinance and the application of such provision to other persons or circumstances shall not be affected thereby

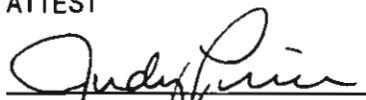
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The foregoing Ordinance was introduced at a regular meeting of the Truckee Town Council held on the 16<sup>th</sup> day of April 2009, and adopted at a regular meeting of the Truckee Town Council, on the 7<sup>th</sup> day of May 2009, Council Member Anderson, moved for the adoption, the motion was seconded by Vice Mayor Wallace Dee, and was carried by the following vote

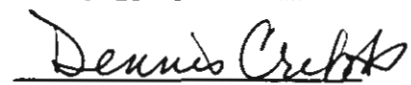
<b>AYES</b>	<b>Council Member Anderson, Vice Mayor Wallace Dee, Council Member Green, Council Member de-Ryk-Jones, Mayor Brown</b>
<b>NOES</b>	<b>None</b>
<b>ABSENT</b>	<b>None</b>

  
Dr Mark Brown Mayor

ATTEST

  
Judy Price, CMC, Town Clerk

APPROVED AS TO FORM

  
Dennis Crabb, Town Attorney