

BOARD of SUPERVISORS



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MEMORANDUM

TO: Kelly Dearman, Executive Officer, Department of Disability and Aging Services

FROM: Victor Young, Assistant Clerk *Victor Young*

DATE: April 3, 2024

SUBJECT: LEGISLATION INTRODUCED

The Board of Supervisors' Rules Committee received the following proposed Ordinance:

File No. 240281

Ordinance amending the Administrative and Business and Tax Regulations Codes to change the frequency of the Housing Needs Overview for Seniors and People with Disabilities and the Housing Needs Assessment and Production Pipeline Report for Seniors and People with Disabilities; and to update all references to the Department of Disability and Aging Services (DAS) consistent with the Charter and make other non-material corrections.

If you have comments or reports to be included with the file, please forward them to Victor Young at the Board of Supervisors, City Hall, Room 244, 1 Dr. Carlton B. Goodlett Place, San Francisco, CA 94102 or by email at: victor.young@sfgov.org.

1 [Administrative, Business and Tax Regulations Codes - Housing Needs Report Frequency
2 and DAS Department Name Updates]

3 **Ordinance amending the Administrative and Business and Tax Regulations Codes to**
4 **change the frequency of the Housing Needs Overview for Seniors and People with**
5 **Disabilities and the Housing Needs Assessment and Production Pipeline Report for**
6 **Seniors and People with Disabilities; and to update all references to the Department of**
7 **Disability and Aging Services ([DAS](#)) consistent with the Charter and make other non-**
8 **material corrections.**

9 NOTE: **Unchanged Code text and uncodified text** are in plain Arial font.
10 **Additions to Codes** are in *single-underline italics Times New Roman font*.
11 **Deletions to Codes** are in *strikethrough italics Times New Roman font*.
12 **Board amendment additions** are in double-underlined Arial font.
13 **Board amendment deletions** are in ~~strikethrough Arial font~~.
14 **Asterisks (* * * *)** indicate the omission of unchanged Code
15 subsections or parts of tables.

16 Be it ordained by the People of the City and County of San Francisco:

17 Section 1. Chapter 111 of the Administrative Code is hereby amended by revising
18 Section 111.1, to read as follows:

19 **SEC. 111.1. HOUSING REPORTS.**

20 (a) The Department of Disability and Aging Services ("~~DAAS~~DAS") shall publish a
21 Housing Needs Overview for Seniors and People with Disabilities ("Overview Report") by
22 October 1, ~~2021~~2025, and by October 1 every *other* year thereafter, except years in which
23 ~~DAAS~~DAS publishes a *Needs Assessment* Report under subsection (c) of this Section 111.1. The
24 Overview Report shall contain a comparison of both the median income of seniors and the
25 median income of people with disabilities in the City to rents charged at City-funded affordable
housing and shall include the number of existing units by: neighborhood, housing type, units

1 occupied by seniors, units occupied by people with disabilities, and units accessible to people
2 with disabilities, as well as information and analysis regarding affordability by income level;
3 and for each City-funded housing development planned or in construction within the next
4 three years, a timeline for production, and an analysis of the number of housing units
5 projected in each such City-funded housing development to be occupied by seniors and
6 people with disabilities, including information and analysis regarding affordability by income
7 level, accessibility for people with disabilities, neighborhood, and housing type.

8 (b) The Mayor’s Office of Housing and Community Development (“MOHCD”) shall
9 contribute to the Overview Report required under subsection (a), by providing DAASDAS the
10 data it requires to complete the Overview Report.

11 (c) DAASDAS shall work in collaboration with MOHCD, the Planning Department, the
12 Department of Homelessness and Supportive Housing (“HSH”), and the Mayor’s Office *of*
13 Disability to publish a Housing Needs Assessment and Production Pipeline Report for Seniors
14 and People with Disabilities (“Needs Assessment Report”) by October 1, ~~2022~~2027, and every
15 ~~third~~eight year thereafter that addresses, to the extent feasible, at least the following:

16 (1) An analysis of housing needs for seniors addressing median household
17 income of seniors who are tenants and who are homeowners in the City; rent or housing cost
18 burden; overcrowding; security of tenure; disability; and overall housing shortages, by income
19 level, race/ethnicity, primary language, age range, household type, neighborhood, and
20 housing type.

21 (2) An analysis of housing needs for people with disabilities addressing median
22 household income of people with disabilities who are tenants and who are homeowners in the
23 City; rent or housing cost burden; overcrowding; security of tenure; and overall housing
24 shortages, by income level, race/ethnicity, primary language, age range, household type,
25 neighborhood, and housing type.

1 (3) An analysis of City housing programs or services that specifically target
2 seniors and people with disabilities, including but not limited to the number of households that
3 include seniors or persons with disabilities served by rental subsidies, counseling support, and
4 homeowner renovation grants.

5 (4) Recommendations to address the unmet needs of seniors and people with
6 disabilities for affordable housing and to improve the coordination of the development of City-
7 funded housing and the delivery of services for those populations.

8 (d) MOHCD shall contribute to the Needs Assessment Report required under
9 subsection (c):

10 (1) Data, including location and number, of housing units designed to serve or
11 accommodate, and housing units set aside for, seniors and people with disabilities, completed
12 over the previous two years.

13 (2) An analysis of potential sites over the next five years for future housing
14 developments for seniors and people with disabilities, including analysis of affordability by
15 income level and accessibility for people with disabilities.

16 (3) An evaluation of how planned and potential future housing developments align
17 with the housing needs of seniors and people with disabilities, addressing, to the extent
18 feasible, housing needs by income level.

19 (4) An assessment of the unmet needs of extremely low-income seniors and
20 extremely low-income people with disabilities relative to City-funded affordable housing and
21 MOHCD's efforts over the previous year to address those needs.

22 (5) Such other information as ~~DAAS~~DAS requests for its analysis.

23 (e) The Overview Report and the Needs Assessment Report shall present information
24 in de-identified form to protect the privacy of individuals whose data are included in the
25 reports. Data collected for the Overview Report and the Needs Assessment Report shall be

1 confidential to the extent of protecting personal privacy insofar as the law requires or permits
2 such protection.

3 (f) ~~DAASDAS~~ shall present, in collaboration with MOHCD, the Planning Department,
4 ~~the HSH~~, and the Mayor’s Office ~~of~~ Disability, the Overview Report and the Needs Assessment
5 Report to the Board of Supervisors, along with any recommendations for legislation or other
6 policy recommendations.

7 (g) The Overview Report and the Needs Assessment Report shall address each item
8 to the extent feasible based on available data. ~~DAASDAS~~ and MOHCD are not required to
9 collect new data to complete the reports.

10

11 Section 2. Article VI of Chapter 5 of the Administrative Code is hereby amended by
12 revising the title of Article VI, renumbering existing Sections 5.50, 5.52, 5.53, and 5.54 as new
13 Sections 5.6-1, 5.6-2, 5.6-3, and 5.6-4 respectively, and revising new Section 5.6-1, to read as
14 follows:

15 **ARTICLE VI:**

16 **COMMISSION ON ~~THE~~DISABILITY AND AGING**

17 **SEC. 5.6-~~150~~. DEFINITIONS.**

18 ~~(a)~~ **Commission.** The Commission on ~~the~~Disability and Aging.

19 ~~(b)~~ **Council.** The Advisory Council.

20 ~~(c)~~ **Member.** A member of the Commission on ~~the~~Disability and Aging.

21 **SEC. 5.6-~~252~~. COMMISSION DESIGNATED AREA AGENCY ON AGING.**

22 * * * *

23 **SEC. 5.6-~~353~~. POWERS AND DUTIES OF THE COMMISSION.**

24 * * * *

25

1 **SEC. 5.6-454. ADVISORY COUNCIL.**

2 * * * *

3
4 Section 3. Article X of Chapter 5 of the Administrative Code is hereby amended by
5 revising Section 5.10-1, to read as follows:

6 **SEC. 5.10-1. ESTABLISHMENT AND MEMBERSHIP OF FOOD SECURITY TASK**
7 **FORCE.**

8 * * * *

9 (b) **Membership.** The Task Force shall consist of 20 members appointed by the
10 Board of Supervisors, City department heads, or the San Francisco Unified School District, as
11 provided below. Members shall serve at the pleasure of their respective appointing authorities.

12 (1) Seat 1 shall be an employee of the Department of ~~Human Services~~Benefits and
13 Family Support, appointed by the Executive Director of the Human Services Agency.

14 * * * *

15 (3) Seat 3 shall be held by an employee of the Department of ~~Aging~~Disability and
16 ~~Adult~~Aging Services, appointed by the Executive Director of the Human Services Agency.

17 * * * *

18
19 Section 4. Article XIX of Chapter 5 of the Administrative Code is hereby amended by
20 revising Section 5.19-5, to read as follows:

21 **SEC. 5.19-5. FAMILY VIOLENCE COUNCIL – COMPOSITION – TERMS OF**
22 **OFFICE.**

23 (a) **Composition.** The composition of the Council shall broadly represent the ethnic,
24 racial, sex, gender identity, age, and sexual orientation diversity of the communities most
25

1 impacted by family violence. The Council shall consist of the following individuals or their
2 respective designees:

3 * * * *

4 (15) Executive Director of the Department of ~~Adult~~Aging Disability and Aging Services;

5 * * * *

6
7 Section 5. Article XXXIV of Chapter 5 of the Administrative Code is hereby amended
8 by revising Sections 5.34-2 and 5.34-3, to read as follows:

9 **SEC. 5.34-2. MEMBERSHIP.**

10 * * * *

11 (c) Committee members shall serve at the pleasure of their respective appointing
12 authorities and may be removed by their appointing authority at any time. Whenever a
13 member appointed by the ~~Aging~~Adult Disability and ~~Adult~~Aging Services Commission, the Advisory
14 Council to the Department of ~~Aging~~Adult Disability and ~~Adult~~Aging Services, or the Long Term Care
15 Coordinating Council vacates the member's seat on ~~his or her~~the member's appointing body, the
16 member shall automatically vacate ~~his or her~~the member's seat on the Committee as well.

17 * * * *

18 **SEC. 5.34-3. ADMINISTRATIVE AND TECHNICAL SUPPORT.**

19 Consistent with Charter Section 16.128-4(h), the Department of ~~Aging~~Adult Disability and
20 ~~Adult~~Aging Services shall provide administrative and technical support to the Committee. The
21 Department shall also provide administrative and technical support to the Service Provider
22 Working Group required by Charter Section 16.128-11.

23
24 Section 6. Article XLIV of Chapter 5 of the Administrative Code is hereby amended by
25 revising Section 5.44-3, to read as follows:

1 **SEC. 5.44-3. ORGANIZATION AND TERMS OF OFFICE.**

2 * * * *

3 (i) One representative from each of the following departments shall attend meetings of
4 the Implementation Working Group to be available for consultation by its members: the
5 Department of Public Health, the Human Services Agency, the Department of *AgingDisability*
6 and *AdultAging* Services, and the Department of Homelessness and Supportive Housing.

7
8 Section 7. Article XIII of Chapter 10 of the Administrative Code is hereby amended by
9 renumbering and revising Section 10.100-12, and revising Sections 10.100-190, and 10.100-
10 324, to read as follows:

11 **SEC. ~~10.100-1253~~. AGINGDISABILITY AND ADULTAGING SERVICES COMMUNITY**
12 **LIVING FUND.**

13 (a) **Establishment of Fund.** The *AgingDisability* and *AdultAging* Services Community
14 Living Special Fund is established as a Category 4 special fund, meaning that funds may be
15 appropriated, interest shall be accumulated and that any fund balance shall carry forward year
16 to year. The fund may be referred to as the “Community Living Fund for *AgingDisability* and
17 *AdultAging* Services”. The Community Living Fund for *AgingDisability* and *AdultAging* Services
18 shall contain all monies appropriated from any lawful source for this purpose pursuant
19 to Article IX of the City Charter. Unless expressly indicated in the Annual Appropriation
20 Ordinance, the funds appropriated to the Community Living Fund for *AgingDisability* and
21 *AdultAging* Services, regardless of the source, are not intended to supplant any existing
22 funding for community-based long-term care and supportive services.

23 (b) **Use of Fund.** Monies deposited in the fund shall be expended for the purposes
24 designated by the Director of the Department of *AgingDisability* and *AdultAging* Services
25 (~~DAAS~~“*DAS*”), as approved by the *AgingDisability* and *AdultAging* Services Commission, and

1 after consideration of input provided by the Health Department and the Long Term Care
2 Coordinating Council. The fund shall be used primarily for programs and services, including
3 assistance for individuals to age in place in their own homes or in assisted living facilities and
4 supportive housing. Such programs and services shall include those offered or funded by City
5 agencies other than DAASDAS. The fund shall target those individuals currently placed in
6 institutional care who are willing and able to be discharged to community living as well as
7 those individuals at imminent risk of placement in institutional care. Funding shall be used for
8 services and programs that enable an individual to live independently in the community. The
9 fund would prioritize services where funding is not available through alternative sources or
10 programs, or those services that may be needed as a bridge while alternative funding is
11 secured. Services may include, but are not limited to the following: case management,
12 personal assistance services and homecare, adult day health and social day programs,
13 money management, mental health and substance abuse services including residential
14 programs, 24-hour mental health services, home health care, and subsidies for housing and
15 residential care. Eligibility for assistance from this fund shall be based on independent needs
16 assessments performed by qualified public and private providers and subject to the priorities
17 set by DAASDAS through the planning and budgeting process. Funds shall target low-income
18 individuals with incomes of up to 300% ~~percent~~ of the Federal Poverty Level subject to
19 subsection (e). Funding is intended to increase and enhance services and support for
20 individuals in a way that is consumer-centered and flexible. In no event shall the cost of
21 department staffing associated with the duties and services associated with this fund exceed
22 15% (~~fifteen percent~~) of the total amount of the fund.

23 (c) **Administration of the Fund.** The Executive Director of AgingDisability and
24 AdultAging Services, or ~~their~~ the Executive Director's designee, shall administer the fund. An
25 annual plan shall be prepared by DAASDAS and submitted to the AgingDisability and

1 ~~Adult~~Aging Services Commission for approval after a public hearing process that includes
2 input from the Health Department and the Long Term Care Coordinating Council. Wherever
3 possible, the annual plan will prioritize projects where providing funding is likely to result in
4 additional State, federal, or charitable dollars.

5 (d) **Reporting Requirement.** Six months from the adoption of this ordinance, and
6 every six months thereafter, ~~DAASDAS~~ shall report to the Board of Supervisors the level of
7 service provided and costs incurred in connection with the duties and services associated with
8 this fund.

9 (e) **Economic Security Index Pilot Program.**

10 (1) ~~DAASDAS~~ shall develop and implement a pilot program using the 2009 Elder
11 Economic Security Standard Index calculated by the University of California as one of the
12 factors for determining eligibility for applicants to the Community Living Fund, regardless of
13 age, under subsection (b), in place of using a multiplier of the Federal Poverty Level. The pilot
14 program shall end on January 1, 2011, unless this requirement is extended by ordinance ~~of the~~
15 ~~Board of Supervisors~~. During the pilot project, ~~DAASDAS~~ will collect and analyze relevant data
16 but will not alter current Community Living Fund eligibility requirements.

17 (2) ~~DAASDAS~~ shall report on use of the Economic Security Index as part of the first
18 report it submits to the Board of Supervisors under subsection (d) following the completion of
19 the first six months of the pilot program, and then again in the following report, so that use of
20 the Index is addressed by ~~DAASDAS~~ in at least two reporting cycles. The reports shall discuss
21 the impact of using the Index on available resources and the applicant population, and shall
22 include recommendations on the continued use of the Index. After receipt of the second
23 report, the Board may act to extend the pilot project. The Board may also consider at any time
24 after the receipt of the second report the use of other indexes, similar to the Elder Economic
25 Security Standard Index, such as the Family Economic Self-Sufficiency Standard or other

1 relevant indices, to supplement or replace use of the Federal Poverty Level in determining the
2 costs of living in the Bay Area as part of local eligibility criteria for other city programs.

3 **SEC. 10.100-190. PUBLIC GUARDIAN/PUBLIC ADMINISTRATOR GIFT FUND.**

4 * * * *

5 (b) **Use of Fund.** The S.F. Public Guardian is the official under the California Probate
6 Code to serve as the conservator where there is no one else who is qualified and willing to act
7 and where the Public Guardian's appointment would be in the best interest of the individual as
8 determined by the San Francisco Probate Court. Monies deposited in the fund shall be
9 expended for the purposes designated by the Public Guardian and the Executive Director of
10 the Department of AgingDisability and AdultAging Services. The fund shall be used primarily to
11 increase and enhance conservatorship services for individuals who are unable to meet basic
12 personal needs for health, food, clothing, and shelter or who are substantially unable to
13 manage their financial resources. The fund may be used to increase staffing and other
14 resources to better provide services including, but not limited to the following: investigating
15 and processing conservatorships; assessing physical, mental, and financial needs; ensuring
16 appropriate medical care, social work services, and budgeting for conservatees; securing
17 housing or shelter for conservatees; locating and managing the assets and income of
18 conservatees; developing plans for both immediate and long-term care of conservatees; and
19 advocating on behalf of conservatees to government agencies, private parties, relatives, and
20 other individuals.

21 (c) **Administration of the Fund.** The Public Guardian and the Executive Director of
22 the Department of AgingDisability and AdultAging Services, shall jointly administer the fund.

23 **SEC. 10.100-324. SENIOR OPERATING SUBSIDIES (SOS) PROGRAM FUND.**

24 * * * *

1 (c) **Administration of Fund.** The Department of ~~Aging~~Disability and ~~Adult~~Aging
2 Services ("~~DAASDAS~~") shall administer the SOS Fund, and in such capacity shall enter into
3 grant agreements for terms of no less than 15 years with operators of new senior affordable
4 housing developments to subsidize rents of designated units so that they may be set and
5 maintained at the maximum rent level that is affordable to senior households with an income
6 of 15% or 25% of area median income, as published by MOHCD. The SOS Fund shall be
7 distributed in a way to benefit more than one senior affordable housing development funded
8 by the City. ~~DAASDAS~~ shall submit a report annually to the Board of Supervisors and the
9 Mayor on the use of the SOS Fund during the preceding fiscal year, which may include, but is
10 not limited to, the amounts approved for disbursement and the number of units assisted by the
11 SOS Fund.

12 (d) **Eligible Affordable Housing Developments.** ~~DAASDAS~~ shall establish minimum
13 requirements for project eligibility, including but not limited to: (1) the affordable housing
14 development must be subject to enforceable income and affordability restrictions through a
15 recorded loan, grant, or ground lease from MOHCD or the Office of Community Investment
16 and Infrastructure; (2) the affordable housing development must contain residential rental
17 units restricted to low-income senior households; and (3) the affordable housing development
18 must have secured financing to restrict a portion of the residential units at or below 60% of
19 area median income, as published by MOHCD. In its administration of the SOS Fund,
20 ~~DAASDAS~~ shall prioritize new affordable senior housing developments that are under
21 construction or in predevelopment as of the effective date of the ordinance in Board File No.
22 190684 establishing this Section 10.100-324.

23 (e) **Tenant Selection.** Applications for units in senior housing developments that are
24 subsidized by the SOS Fund shall be managed through the San Francisco Housing Portal
25 ("~~DAHLIA~~"), a project of MOHCD.

1 (f) **Fund Regulations.** The ~~DAASDAS~~ Executive Director may publish from time to time
2 program regulations as appropriate to administer the SOS Fund.

3
4 Section 8. Chapter 70 of the Administrative Code is hereby amended by revising
5 Section 70.4, to read as follows:

6 **SEC. 70.4. FISCAL PROVISIONS.**

7 * * * *

8 (c) The Human Services Agency through the Department of ~~Aging~~Disability and
9 ~~Adult~~Aging Services shall be the financial liaison between the City and County of San
10 Francisco and the Authority. The Human Services Agency shall take appropriate action in
11 order to procure all available federal and State funds for the administration and delivery of
12 IHSS, and by contract, grant, or agreement, transfer monies procured from these sources and
13 from any funds that the City may appropriate, to the Authority for the operation of its
14 designated functions, subject to the budgetary and fiscal provisions of the ~~San Francisco~~
15 Charter and the ~~San Francisco~~-Administrative Code. The Authority shall submit its annual
16 funding request to the Department of ~~Aging~~Disability and ~~Adult~~Aging Services no later than the
17 deadline determined by the Human Services Agency to enable the Agency to prepare and
18 submit its budget to the Mayor's office. The Authority shall comply with all claiming and
19 reporting deadlines set by the Human Services Agency and the Department of ~~Aging~~Disability
20 and ~~Adult~~Aging Services.

21 The total of all operating costs, wages, and benefits proposed or established by the
22 Authority must be consistent with the provisions of the final City budget.

23 * * * *

1 Section 9. Chapter 92 of the Administrative Code is hereby amended by revising
2 Sections 92.1 through 92.4, to read as follows:

3 **SEC. 92.1. FINDINGS AND PURPOSE.**

4 This Board makes the following findings:

5 * * * *

6 6. The Department of ~~Aging~~Disability and ~~Adult~~Aging Services currently provides
7 assistance to victims of predatory lending practices in San Francisco. The Department works
8 with nonprofit and other organizations involved in predatory lending counseling and education
9 programs, but has no mandate or funding to develop its own program for these vitally needed
10 services.

11 **SEC. 92.2. PILOT CONSUMER LOAN EDUCATION PROGRAM.**

12 A. The Department of ~~Adult~~Disability and Aging Services shall develop and commence
13 a one-year program to educate San Franciscans about predatory loan practices and to
14 prevent sub-prime lenders from targeting low-income neighborhoods for predatory loans. All
15 City Departments shall cooperate with and assist the Department of ~~Adult~~Disability and Aging
16 Services in developing and administering the consumer loan education program.

17 * * * *

18 **SEC. 92.3. PILOT CONSUMER LOAN COUNSELING PROGRAM.**

19 A. The Department of ~~Adult~~Disability and Aging Services shall commence a one-year
20 program to provide free or low-cost financial counseling to individuals with outstanding loans
21 and individuals who apply for loans secured by their residence property located in San
22 Francisco. Financial counseling shall include:

- 23 1. Review of loan documents and an explanation of all terms and conditions of a
24 consumer loan.
25

1 2. An explanation of consumer rights under state and federal laws which regulate
2 loan practices, verification that all loan documents have been supplied, and that all required
3 disclosures are complete.

4 B. The Department shall not make personal financial assessments for individuals,
5 recommend particular lenders, or provide legal advice. The Department may provide
6 consumer loan counseling services using City personnel, cooperating nonprofit organizations
7 and institutions, consultants and contractors, or any combination of these resources in an
8 effort to reach a citywide audience. All City Departments shall cooperate with and assist the
9 Department of ~~Adult~~Disability and Aging Services in developing and administering the
10 consumer loan counseling program.

11 **SEC. 92.4. REPORT TO BOARD OF SUPERVISORS.**

12 At the conclusion of the pilot program the Department of ~~Aging~~Disability and ~~Adult~~Aging
13 Services shall provide the Board of Supervisors with a report on the effectiveness of consumer
14 education and counseling on curbing predatory lending practices. The report shall include:

15 * * * *

16
17 Section 10. Chapter 104 of the Administrative Code is hereby amended by revising
18 Section 104.2, to read as follows:

19 **SEC. 104.2. DEFINITIONS.**

20 For purposes of this Chapter 104:

21 * * * *

22 “Covered Department” means the Department of Public Health, the Department of
23 Human Services, the Department of ~~Aging~~Disability and ~~Adult~~Aging Services, the Department
24 of Children, Youth and their Families, the Department of Homelessness and Supportive
25 Housing, and the Mayor's Office of Housing and Community Development.

1 * * * *

2
3 Section 11. Article 2 of the Business and Tax Regulations Code is hereby amended by
4 revising Section 249.1, to read as follows:

5 **SEC. 249.1. FOOD PREPARATION AND SERVICE ESTABLISHMENTS.**

6 * * * *

7 (b) **Exemptions.** The following establishments are exempt from paying the fees
8 required by this Section 249.1:

9 * * * *

10 (2) Food preparation and service establishments funded through the
11 Aging Disability and Adult Aging Services Commission for nutrition projects for older individuals.

12 * * * *

13
14 Section 12. Effective Date.

15 This ordinance shall become effective 30 days after enactment. Enactment occurs
16 when the Mayor signs the ordinance, the Mayor returns the ordinance unsigned or does not
17 sign the ordinance within ten days of receiving it, or the Board of Supervisors overrides the
18 Mayor's veto of the ordinance.

19
20 Section 13. Scope of Ordinance. In enacting this ordinance, the Board of Supervisors
21 intends to amend only those words, phrases, paragraphs, subsections, sections, articles,
22 numbers, punctuation marks, charts, diagrams, or any other constituent parts of the Municipal
23 Code that are explicitly shown in this ordinance as additions, deletions, Board amendment
24
25

