

Memorandum

MIAMI-DADE
COUNTY

Date: (Public Hearing 7-14-15)
June 30, 2015

To: Honorable Chairman Jean Monestime
and Members, Board of County Commissioners

From: Carlos A. Gimenez
Mayor



Subject: Proposed Zoning Ordinance Amending the Leisure City Community Urban Center
Zoning District

Agenda Item No. 5(H)

Attached please find materials related to a zoning application filed in accordance with Section 33-284.89.3 of the Code of Miami-Dade County (Amendments to Urban Center District Land Use Plan Category or Other Regulating Plan). The materials consist of a proposed ordinance containing the applicant's proposed revisions to the Leisure City Community Urban Center District regulating plans and related text as well as the Department of Regulatory and Economic Resources' staff report. This item is quasi-judicial.

The proposed ordinance creates no fiscal impact on Miami-Dade County.



Jack Osterholt, Deputy Mayor

**Miami-Dade County Department of Regulatory and Economic Resources
Staff Report to the Board of County Commissioners**

PH – 14-137

| Recommendation Summary for Leisure City Community Urban Center District (LCUCD) | |
|--|--|
| Commission District | 8 and 9 |
| Applicant | Miami-Dade County Department of Regulatory and Economic Resources |
| Summary of Requests | This application seeks to amend the Leisure City Community Urban Center District (LCUCD) regulations in order to (1) update the regulating plans (street types, sub-districts, land use, density, building heights, designated open spaces, new streets and bike route plans) of the Leisure City Community Urban Center District (LCUCD) regulations; (2) update the Uses section; and (3) update the Development Parameters and the Non-conforming sections. |
| Location | Generally located south of SW 272 Street, west of SW 147 Avenue, north of SW 296 Street, east of the South Dade Busway, Miami-Dade County. |
| Property Size | ±455 acres |
| Existing Zoning | Leisure City Community Urban Center District (LCUCD) |
| Existing Land Use | Mixed-Use |
| 2015-2025 CDMP Land Use Designation | Urban Center |
| Comprehensive Plan Consistency | Consistent with interpretative text, goals, objectives and policies of the CDMP |
| Applicable Zoning Code Section(s) | Section 33-284.89.3 Amendments to Urban Center District Land Use Plan Category or Other Regulating Plan |
| Recommendation | Approval |

REQUEST:

This application seeks to amend the regulations governing the Leisure City Community Urban Center District (LCUCD) -- one of the County's Urban Center Districts (UCDs) -- in order to: (1) update all the regulating plans (street types, sub-districts, land use, density, building heights, designated open spaces, new streets and bike route plans) of the LCUCD regulations; (2) update the Uses section; and (3) update the Development Parameters and the Non-Conforming Use sections.

The updated Sub-Districts Regulating Plan also provides for adjusted Core, Center and Edge Sub-Districts boundaries in a manner consistent with all other Urban Center Districts, while the updated Land Use Regulating Plan introduces the Mixed-Use Industrial land use designation for certain parcels along the South Dixie and Old Dixie Highway corridors.

PURPOSE, PROPERTY HISTORY & DESCRIPTION:

This application has two purposes. The main purpose is to bring the LCUCD Regulations in conformance with recent updates to the County's Standard Urban Center District Regulations (SUCCO). The second purpose is to adjust the boundaries of the Core, Center and Edge Sub-Districts in a manner consistent with other UCDs.

On October 2, 2012, the Board of County Commissioners (BCC) adopted Ordinance No. 12-86, which was a comprehensive overhaul to SUCO. This comprehensive update, among other things, standardized a series of regulations that were included in the individual UCDs, including the permitted uses, building placement and street type development parameters, and the various nonconforming sections. As a result, all individual UCDs need to be amended to conform to Ordinance No. 12-86. However, no formal process existed in order to effectuate the required updates. On December 3, 2013, the BCC adopted Ordinance No. 13-119, establishing a formal process for changing land use categories or regulating plans in urban center or urban area districts. The proposed amendments included in this application will bring the LCUCD Regulations into conformity with the updated SUCO.

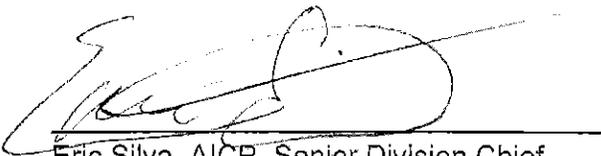
Regarding the updates to the Sub-Districts Regulating Plan, the boundaries of the Core, Center and Edge Sub-Districts have been redrawn in a matter consistent with the Land Use Regulating Plan and with other UCDs. For instance, areas designated as Edge Sub-Districts are now confined to areas designated Residential (R) on the Land Use Regulating Plan. Thus, all areas designated for Residential Modified (RM, multi-family) and any of the mixed-use categories are now designated either Core or Center Sub-Districts depending on their distance from the Leisure City Busway Station and location. The approach used for the revisions to the Sub-Districts Regulating Plan is consistent with that of all other UCDs.

Regarding the updates to the Land Use regulating plan, the original LCUCD pre-dates the establishment of the Mixed-Use Industrial (MCI) land use category in the updated SUCO. The updated Land Use Regulating Plan changes the designation of three properties along the South Dixie and Old Dixie Highways corridors from Industrial (I) to MCI. This new designation is consistent with the mixed uses authorized in the original LCUCD for these industrially designated properties.

RECOMMENDATION:

Staff notes that the proposed updates to the LCUCD Regulations are primarily designed to bring LCUCD into conformance with the SUCO update and are technical in nature.

Staff notes that the proposed regulating plan updates previously described are **consistent** with the adopted 2020-2030 Comprehensive Development Master Plan (CDMP) and **compatible** with the surrounding area, and therefore Staff recommends approval of the updates to the LCUCD.



Eric Silva, AICP, Senior Division Chief
Development Services Division
Miami-Dade County
Department of Regulatory and Economic Resources



MEMORANDUM

(Revised)

TO: Honorable Chairman Jean Monestime
and Members, Board of County Commissioners

DATE: July 14, 2015

FROM: 
R. A. Cuevas, Jr.
County Attorney

SUBJECT: Agenda Item No. 5(H)

Please note any items checked.

- "3-Day Rule" for committees applicable if raised
- 6 weeks required between first reading and public hearing
- 4 weeks notification to municipal officials required prior to public hearing
- Decreases revenues or increases expenditures without balancing budget
- Budget required
- Statement of fiscal impact required
- Ordinance creating a new board requires detailed County Mayor's report for public hearing
- No committee review
- Applicable legislation requires more than a majority vote (i.e., 2/3's _____, 3/5's _____, unanimous _____) to approve
- Current information regarding funding source, index code and available balance, and available capacity (if debt is contemplated) required

Approved _____ Mayor
Veto _____
Override _____

Agenda Item No. 5(H)
7-14-15

ORDINANCE NO. _____

ORDINANCE REVISING ZONING AND OTHER LAND DEVELOPMENT REGULATIONS PERTAINING TO THE LEISURE CITY COMMUNITY URBAN CENTER DISTRICT; AMENDING SECTIONS 33-284.99.34, 33-284.99.35, 33-284.99.36 AND 33-284.99.38 OF THE CODE OF MIAMI-DADE COUNTY, FLORIDA; PROVIDING SEVERABILITY, INCLUSION IN THE CODE, AND AN EFFECTIVE DATE

BE IT ORDAINED BY THE BOARD OF COUNTY COMMISSIONERS OF MIAMI-DADE COUNTY, FLORIDA:

Section 1. Section 33-284.99.34 of the Code of Miami-Dade County, Florida, is hereby amended to read as follows:¹

Sec. 33-284.99.34. Uses.

Except as provided herein, all permitted, conditionally permitted, and temporary uses within the LCUC District shall comply with ~~[[Section 33-284.83]]~~ >>Article XXXIII(K)<< of this code. In addition to the Permitted Uses provided in ~~[[Section 33-284.83(A)]]~~ >>Article XXXIII(K)<<, the following shall be permitted:

1. *In the Mixed-Use Corridor (MC) area:*

* * *

~~[[2.—In the Industrial District (ID) area:~~

- ~~(a) In the Core Sub-district, MC uses at a maximum density of 52 units per net acre or at a maximum density of 60 units per net acre with the purchase of the appropriate number of Severable Use Rights pursuant to sections 33B-41 to 33B-47 of this code.~~
- ~~(b) In the Center Sub-district, MC uses at a maximum~~

¹ Words stricken through and/or ~~[[double bracketed]]~~ shall be deleted. Words underscored and/or >>double arrowed<< constitute the amendment proposed. Remaining provisions are now in effect and remain unchanged.

density of 36 units per net acre.]]

[[3]] >>2<<. In the Institutional (I) area:

- (a) On properties located between SW 282 and SW 284 Streets, west of SW 152 Avenue, all uses permitted in the Residential >>Modified<< (RM) >>area<< with the density provided on the Density Plan in section 33-284.99.35 of this code.

Section 2. Section 33-284.99.35 of the Code of Miami-Dade County, Florida, is hereby amended to read as follows:

Sec. 33-284.99.35. LCUC Regulating Plans.

The Regulating Plans shall consist of the following controlling plans as defined and graphically depicted in this section:

- A. The Street Types Plan, which establishes a hierarchy of street types in existing and future locations. The five (5) Street Types and the hierarchy of streets (from most important to least important in accommodating pedestrian traffic) are U.S. 1, Boulevard, Main Street, Minor Street, and ~~[[Service Road]]~~ >>U.S. 1 Frontage<<.

* * *

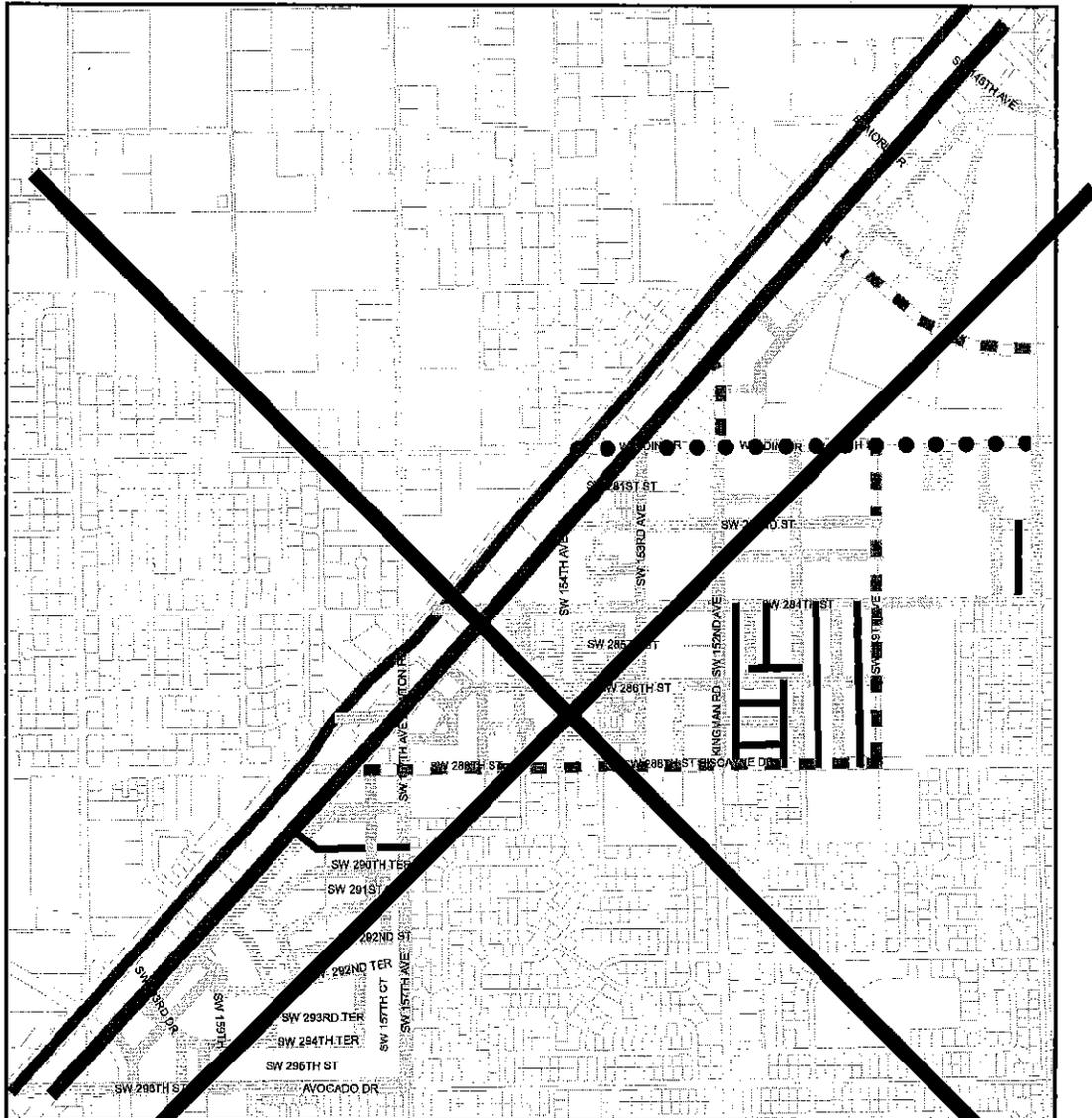
- G. The New Streets Plan, which shows the location and the number of new streets needed to create the prescribed network of streets within the LCUC District. All new A streets shall be required in the same general location as shown on the New Streets Plan. All B streets shall be located as provided in ~~[[Section 33-284.86(F)]]~~ >>Article XXXIII(K)<< of this Code.

- H. The Bike Route Plan, which depicts the designated bike routes, including the bike facility requirements, if any, which shall be shown in all development plans.

A. Street Types Plan.

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Leisure City Community Urban Center Regulating Plans

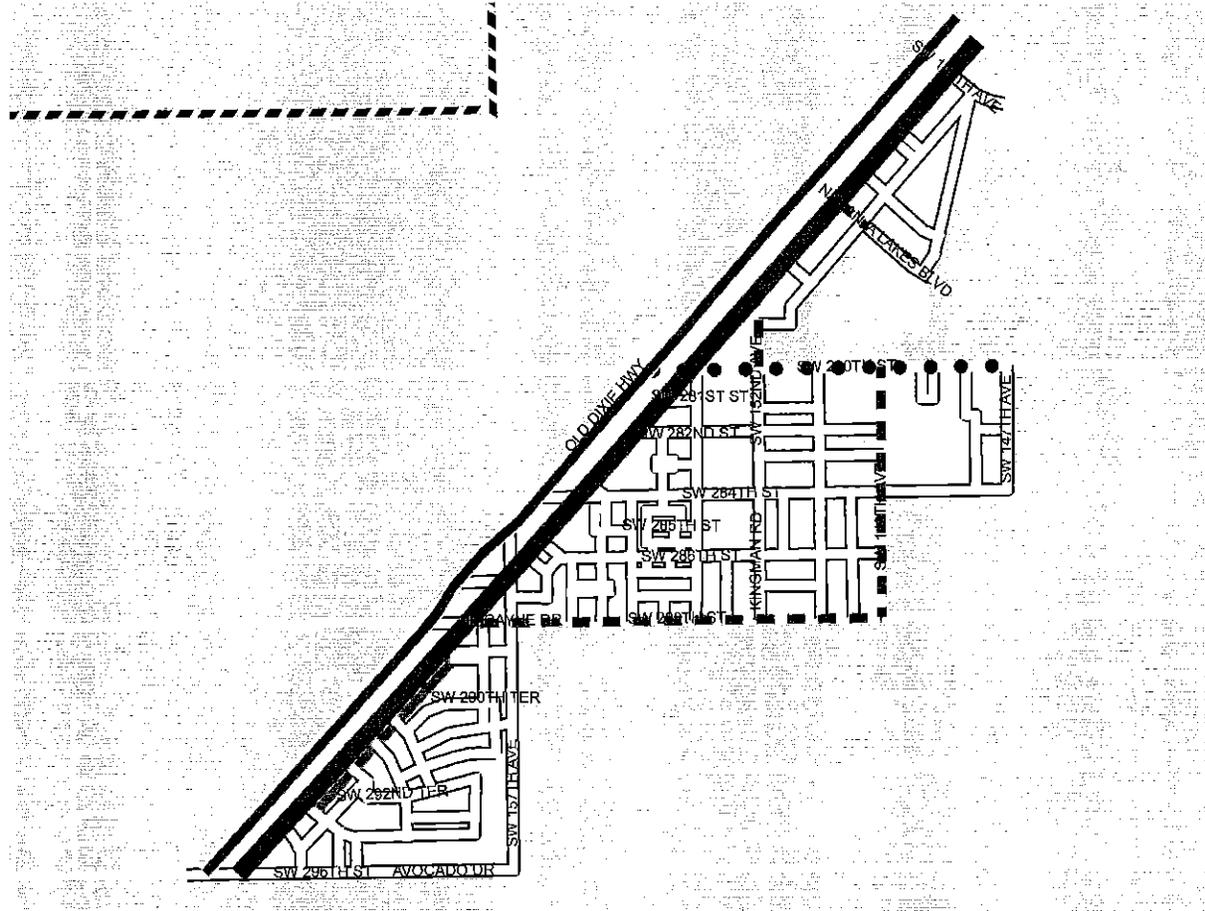


- Key
- Street Types
- ● Main Street: SW 280th St.
 - U.S. Highway 1
 - South Miami Dade Busway
 - Boulevard
 - Minor Street
 - Service Road Core/Center Sub-district (required)

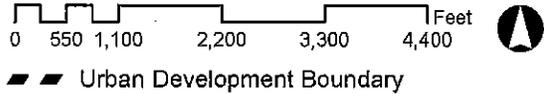
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- Street Types**
-  U.S. 1
 -  Busway
 -  Main Street
 -  Boulevard
 -  Minor
 -  U.S. 1 Frontage

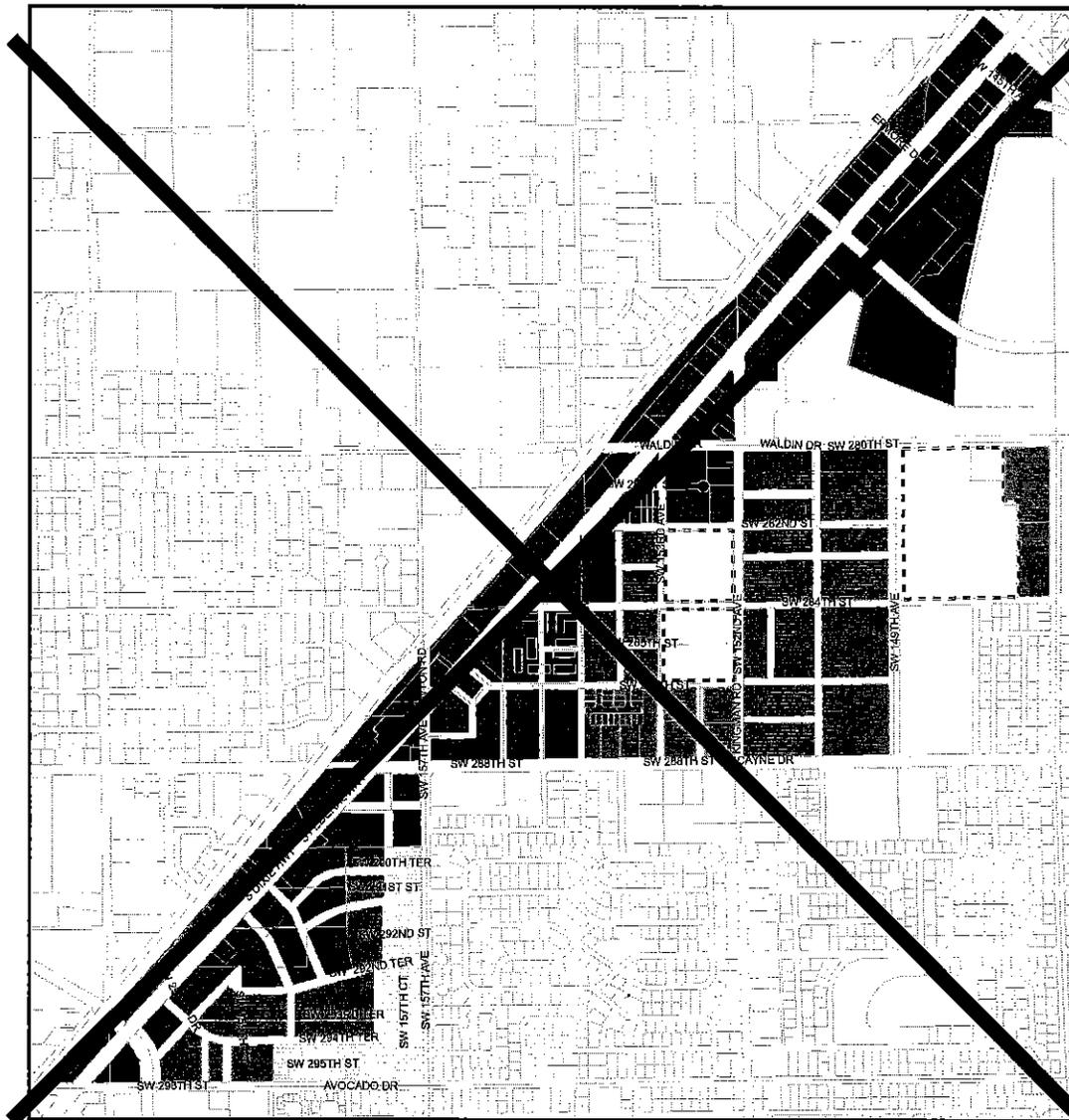


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C. Land Use Plan

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Leisure City Community Urban Center Regulating Plans



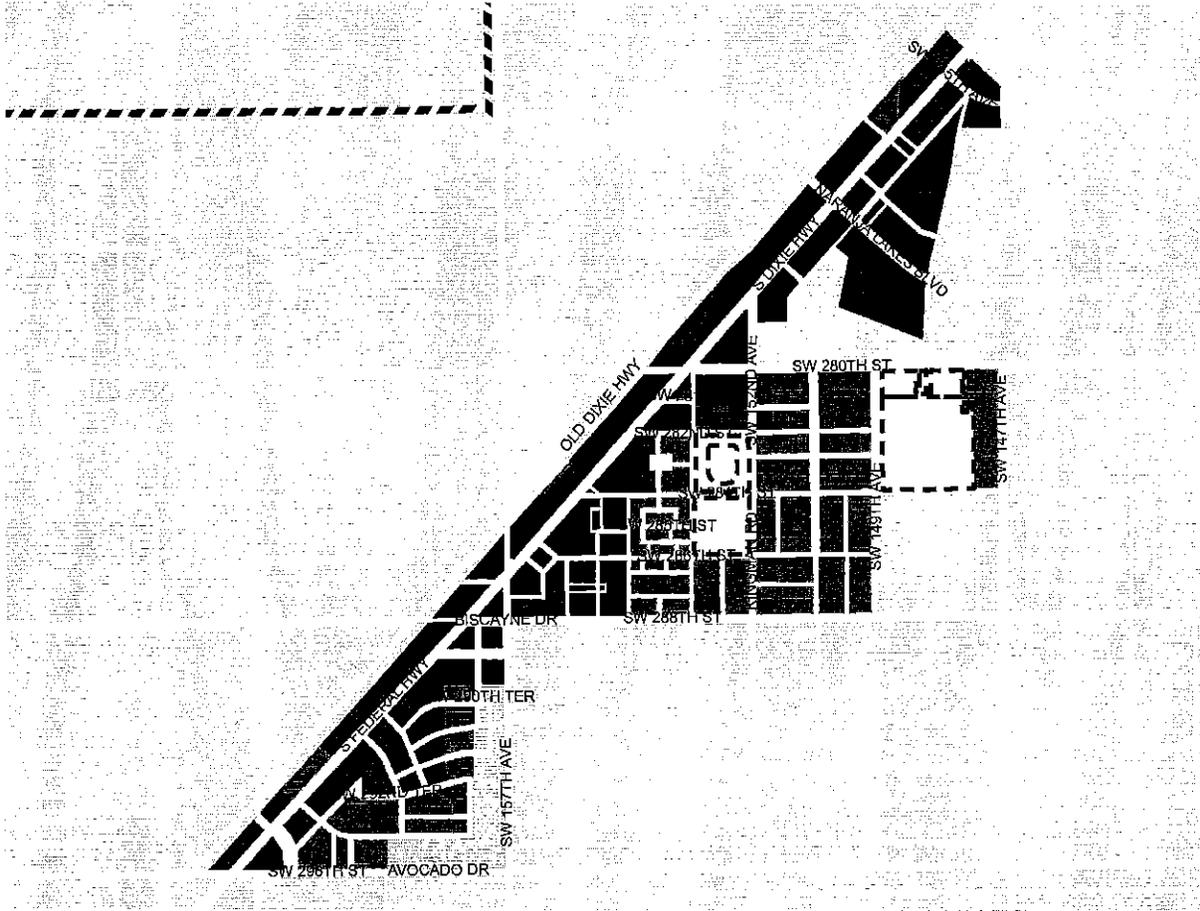
Key

Land Uses

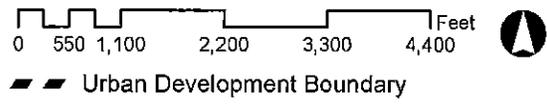
-  MM: Mixed-use Main Street: First and second floors: businesses, professional offices, civic, education, and government offices. Second floor and above: residential.
-  MC: Mixed-use Corridor: Residential, businesses, professional offices, civic, education, and government offices.
-  MO: Mixed-use Optional: First floor (optional) - businesses, professional offices, civic, education, and government offices. All floors: residential.
-  RM: Residential Modified: Courtyard, sideyard, duplex, rowhouse, urban villa, and apartment dwellings.
-  R: Residential: Single family detached, courtyard, sideyard, and duplex dwellings.
-  ID: Industrial District: In all floors and all Sub-Districts: IU-1 uses; live/work units subject to permitted density.
-  I: Institutional: Civic, education, and government offices.

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- Land Use**
-  MM Mixed-Use Main Street
 -  MC Mixed-Use Corridor
 -  MCI Mixed-Use Corridor/Industrial
 -  MO Mixed-Use Optional
 -  RM Residential Modified
 -  R Residential
 -  I Institutional



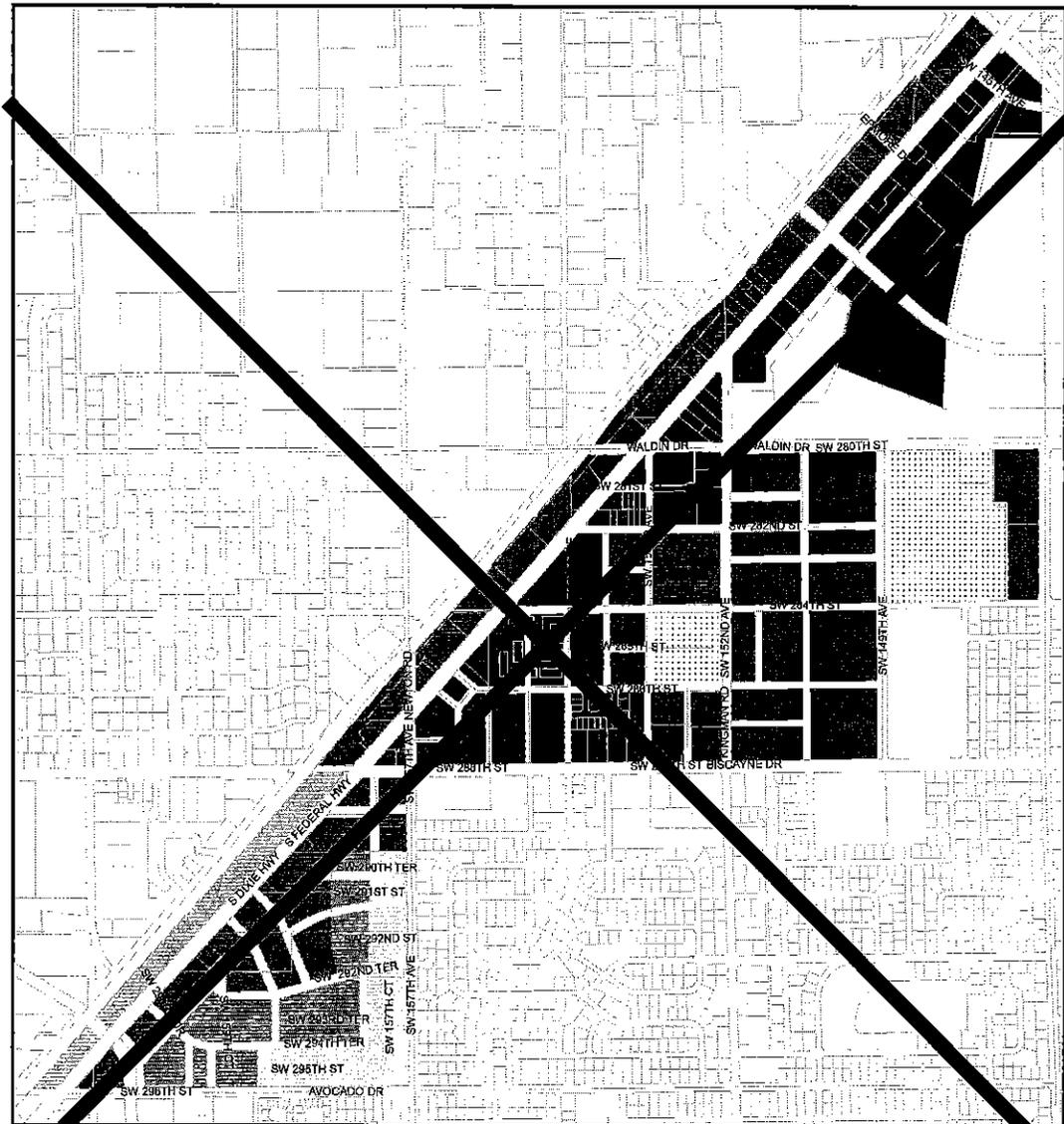
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D. Density Plan

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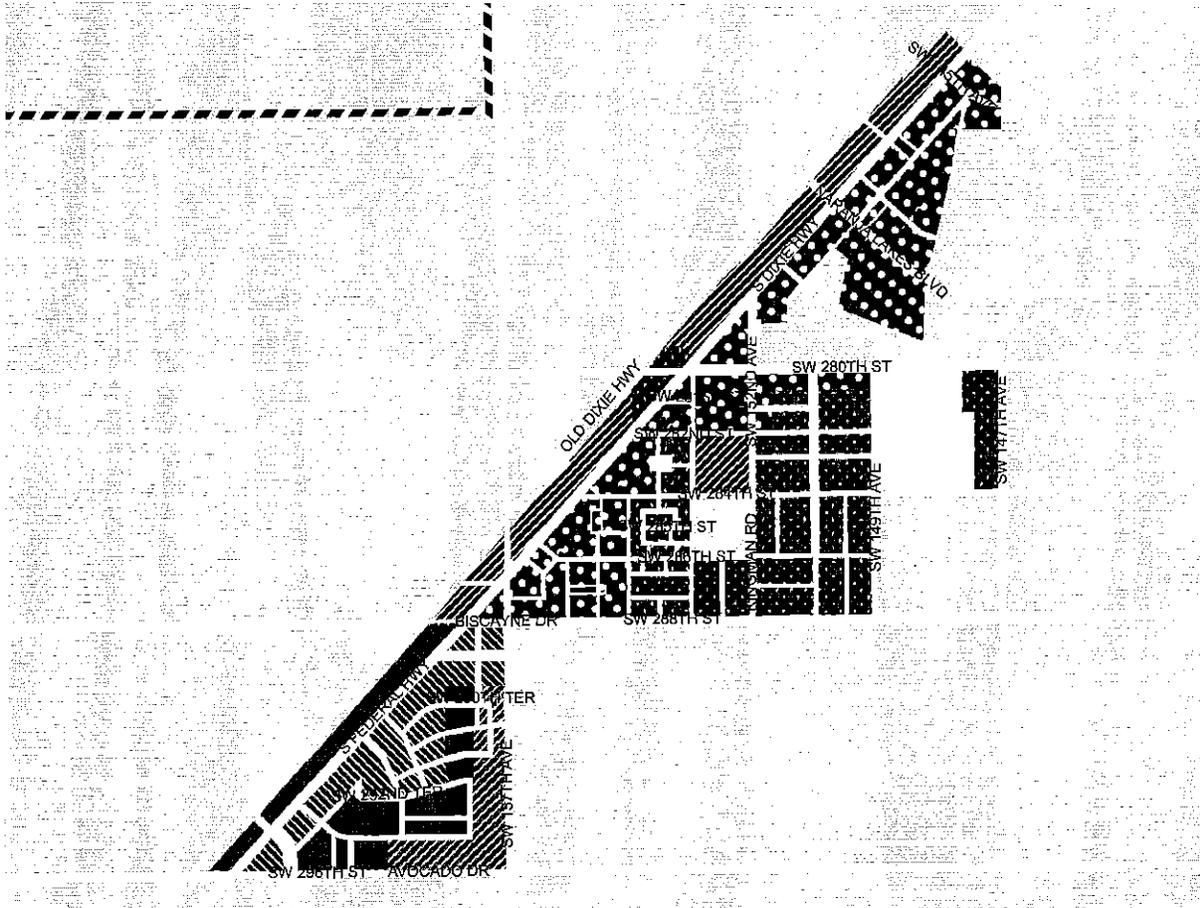
Leisure City Community Urban Center Regulating Plans



- Density**
- Min 12 units/acre net, Max 98 units/acre net or Max SUR (*) (**)
 - Max 90 units/acre net (**)
 - Max 41 units/acre net (**)
 - Min 12 units/acre net, Max 41 units/acre net (**)
 - Min 12 units/acre net, Max 36 units/acre net (**)
 - Max 36 units/acre net
 - Max 25 units/acre net
 - Min 6 units/acre net, Max 18 units/acre net
 - None
 - Min 12 Max 52
 - Max 60

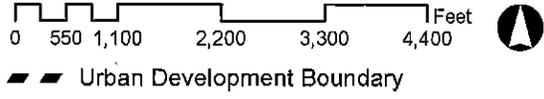
* SUR: Severable Use Right when and to the extent permitted by section 33B-41 to 33B-47 of this code.
 ** 12.5% Workforce housing required as provided in Section 33-284.83 of this code.

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Density-Net

| | |
|--|----------------------------------|
| | Min. 12- Max. 98 units/acre net |
| | Max. 90 Units/acre net |
| | Max. 41 Units/acre net |
| | Min. 12- Max. 41 Units/acre net |
| | Max. 36 Units/acre net |
| | Min. 12 - Max. 36 Units/acre net |
| | Max. 25 units/acre net |
| | Min. 6- Max. 18 Units/acre net |
| | None |



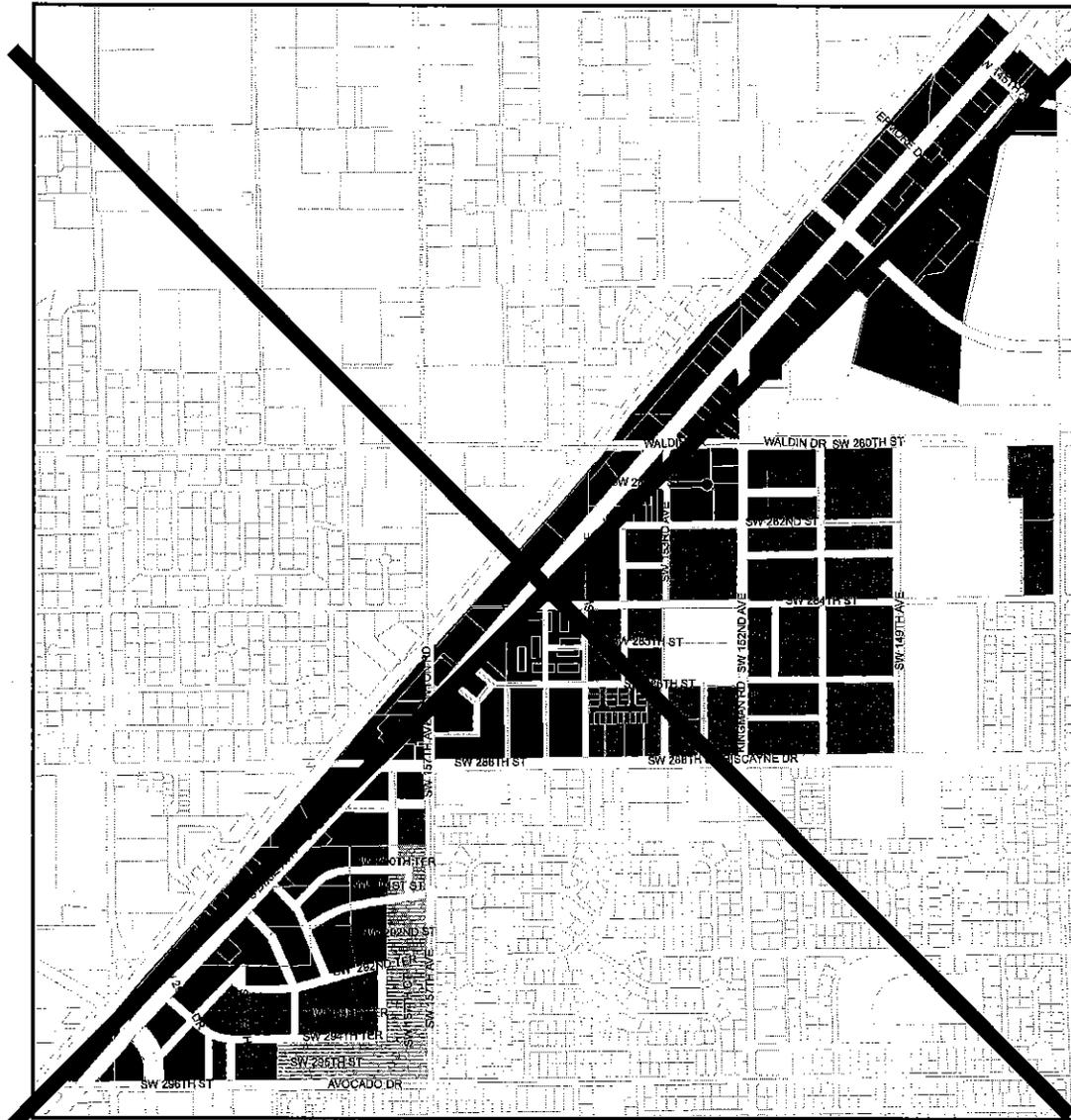
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E. Building Heights Plan

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Leisure City Community Urban Center Regulating Plans

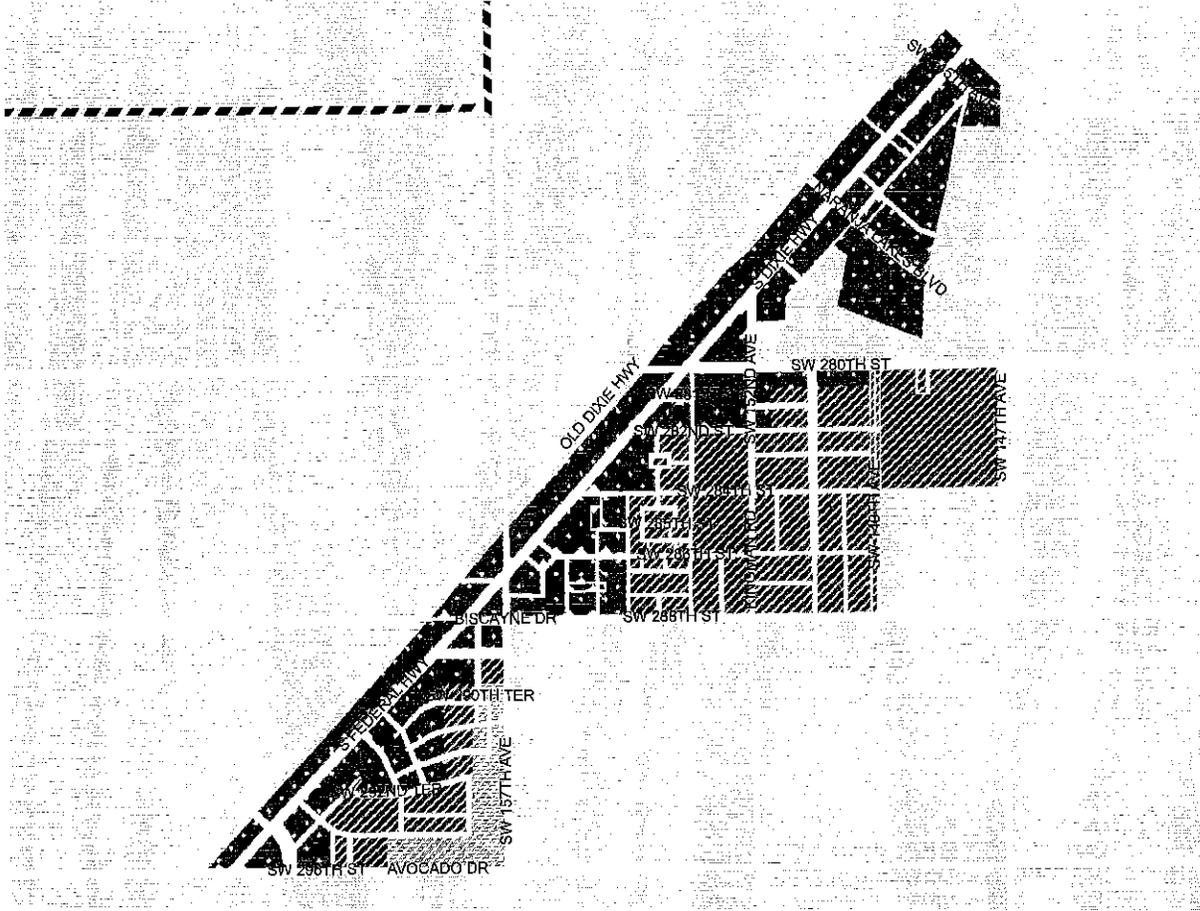


- Key
- Building Heights**
-  Min 3 - Max 6 Floors
 -  Min 2 - Max 4 Floors
 -  Min 1 - Max 2 Floors

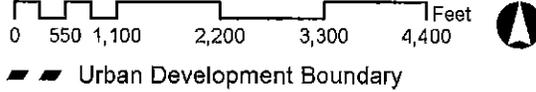
Note: Where a proposed development abuts a single family detached dwelling, the height of the proposed development along the abutting property line, for a minimum depth of 50 feet shall be no greater than the minimum height allowed in the area to be developed. (See Sec. 33-284.99, 19 A of this Code)

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- Building Height**
-  Min. 3 - Max. 6 Stories
 -  Min. 2 - Max. 6 Stories
 -  Min. 2 - Max. 4 Stories
 -  2 Stories Max.

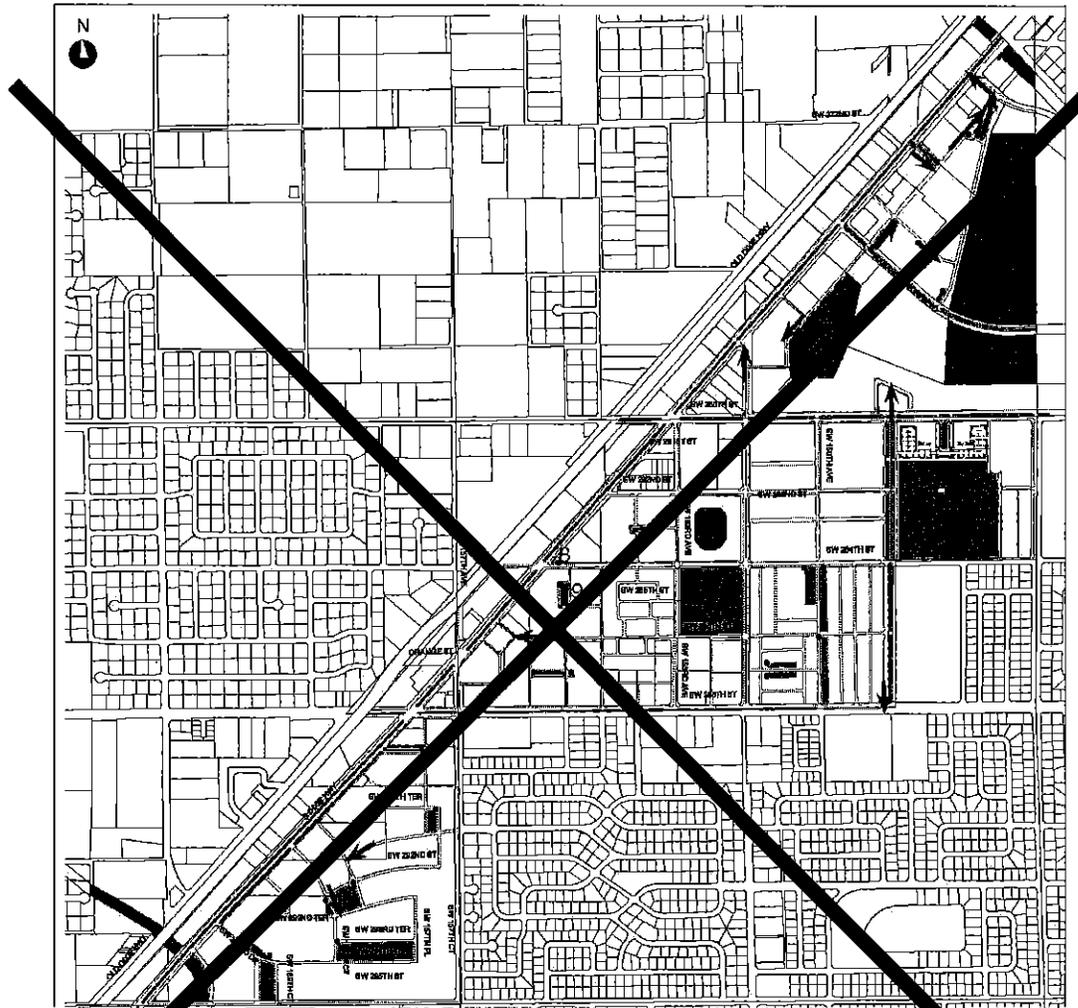


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F. Designated Open Space Plan

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LEISURE CITY COMMUNITY URBAN CENTER REGULATING PLANS



Designated Open Space

KEY

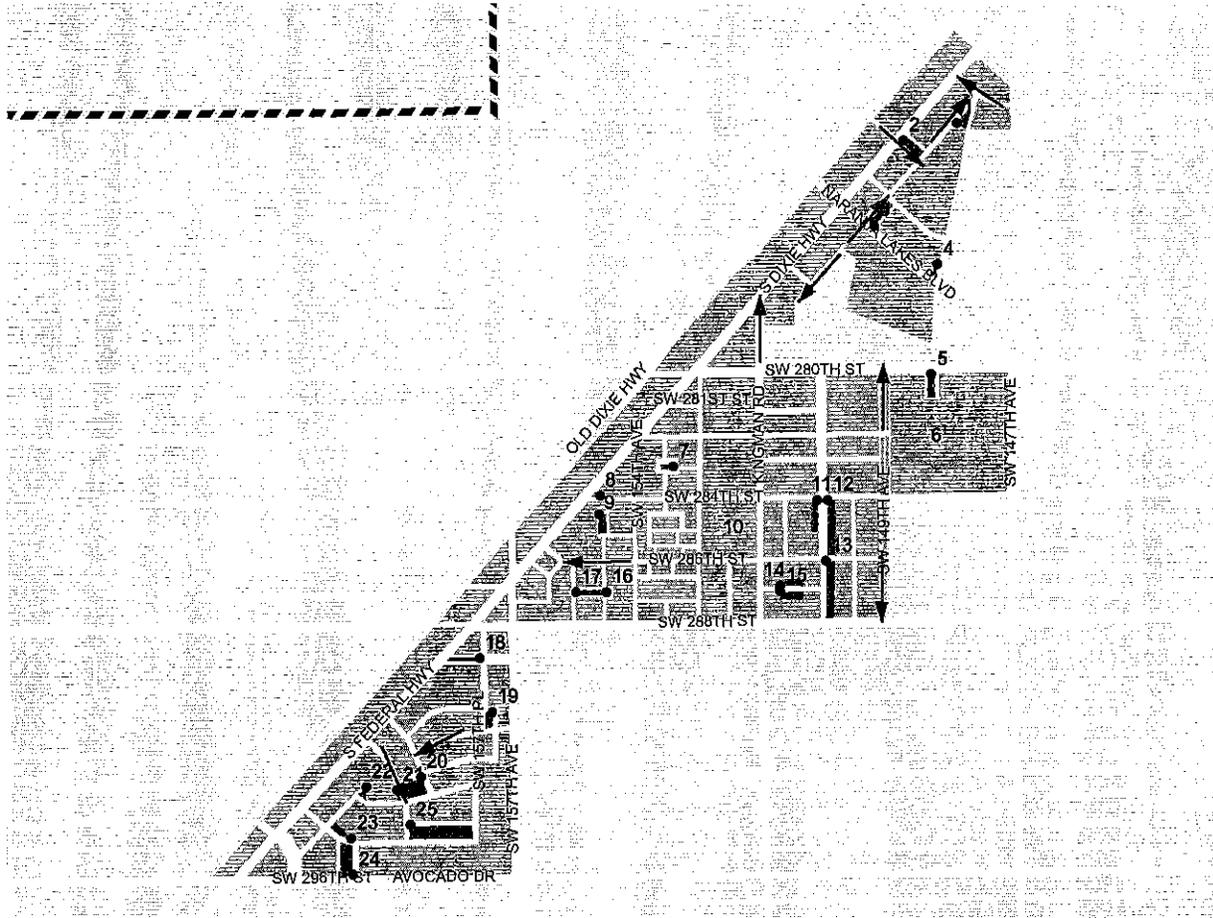
-  Existing Parks
-  Designated Open Space: G: Green;
S: Square; P: Plaza
-  Existing Water Bodies
-  Street Vista
-  Anchor Point

| No | Type | Area (sf) | No | Type | Area (sf) | No | Type | Area (sf) |
|-----|------|-----------|-----|------|-----------|-----|------|-----------|
| 1. | P | 11,000 | 12. | G | 95,500 | 23. | G | 10,500 |
| 2. | S | 7,000 | 13. | G | 98,000 | 24. | G | 42,500 |
| 3. | S | 9,000 | 14. | G | 12,000 | 25. | G | 103,000 |
| 4. | S | 3,000 | 15. | G | 13,500 | | | |
| 5. | G | 12,500 | 16. | G | 1,000 | | | |
| 6. | G | 772,500 | 17. | G | 7,000 | | | |
| 7. | S | 4,000 | 18. | G | 7,000 | | | |
| 8. | S | 1,500 | 19. | G | 16,000 | | | |
| 9. | G | 15,000 | 20. | G | 45,500 | | | |
| 10. | G | Existing | 21. | G | 4,000 | | | |
| 11. | G | 19,000 | 22. | G | 5,500 | | | |

The open space shall provide the general footage shown in this Designated Open Space Plan.

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Open Space Anchor Point
 Street Vista
Designated Open Spaces
 Greens, Squares, Plazas
 Existing Open Space-Miami-Dade County Park

Urban Development Boundary

Feet
 0 550 1,100 2,200 3,300 4,400

| Number | Type | Area | Number | Type | Area | Number | Type | Area |
|--------|------|----------|--------|------|----------|--------|------|---------|
| 1 | P | 11,000 | 10 | N/A | Existing | 19 | G | 16,000 |
| 2 | S | 7,000 | 11 | G | 19,000 | 20 | G | 45,500 |
| 3 | S | 9,000 | 12 | G | 35,500 | 21 | G | 4,000 |
| 4 | S | 3,000 | 13 | G | 38,000 | 22 | G | 5,500 |
| 5 | G | Existing | 14 | G | 12,000 | 23 | G | 12,500 |
| 6 | N/A | Existing | 15 | G | 13,500 | 24 | G | 42,500 |
| 7 | S | 4,000 | 16 | G | 1,000 | 25 | G | 103,000 |
| 8 | S | 1,500 | 17 | G | 7,000 | | | |
| 9 | G | 15,000 | 18 | G | 7,000 | | | |

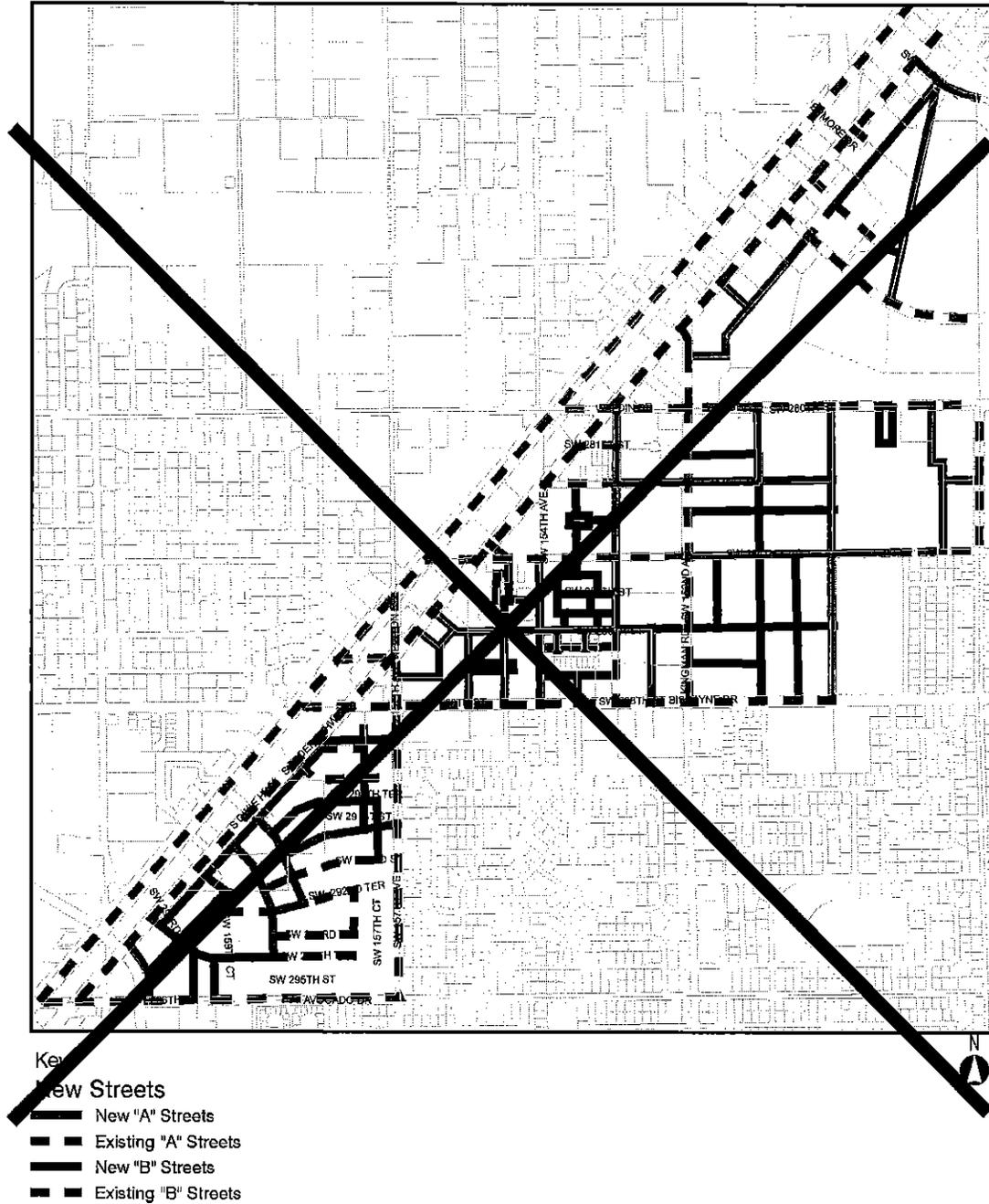
G: Green, S: Square, P: Plaza N/A: Not applicable

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G. New Street Dedications Plan

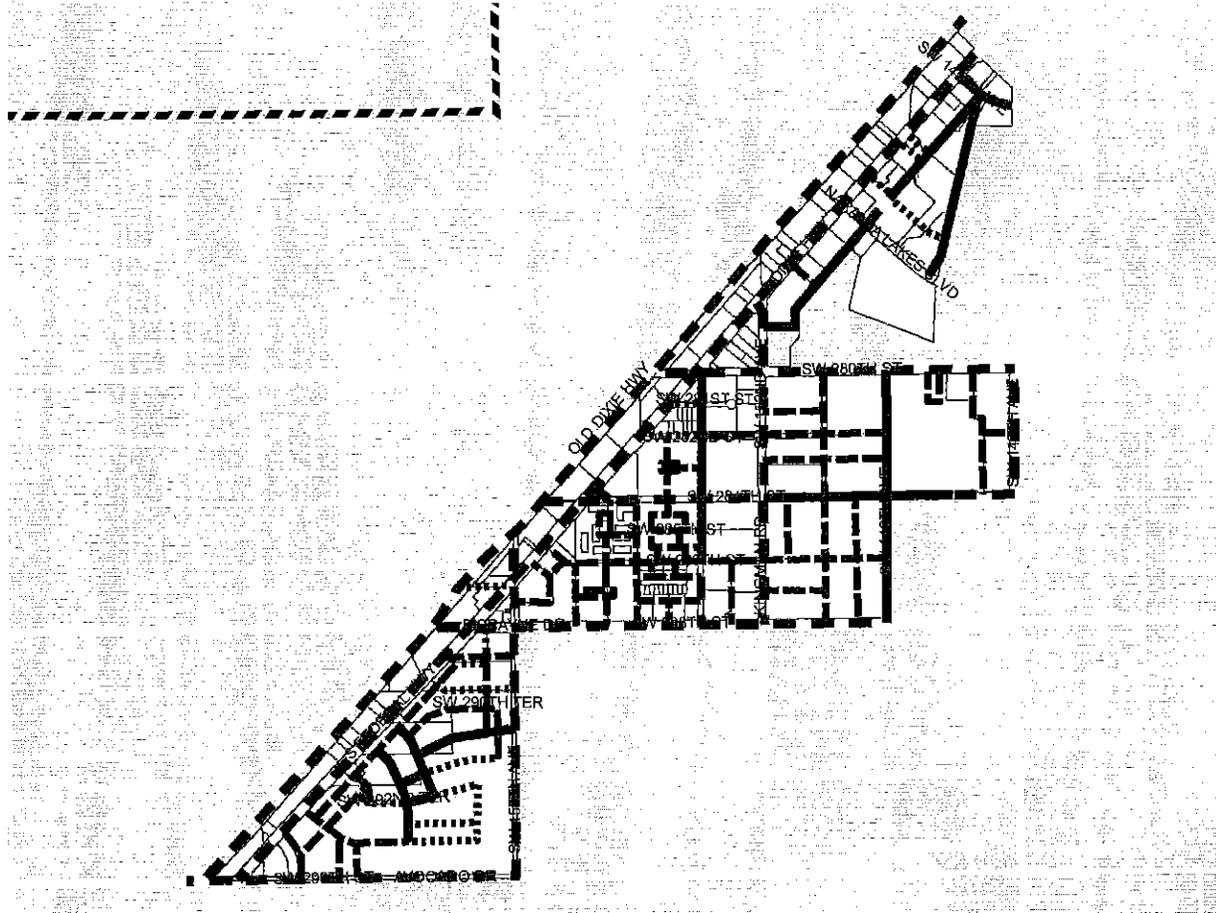
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Leisure City Community Urban Center Regulating Plans



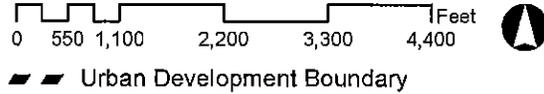
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A/B Streets

-  A Existing
-  A New
-  B Existing
-  B New

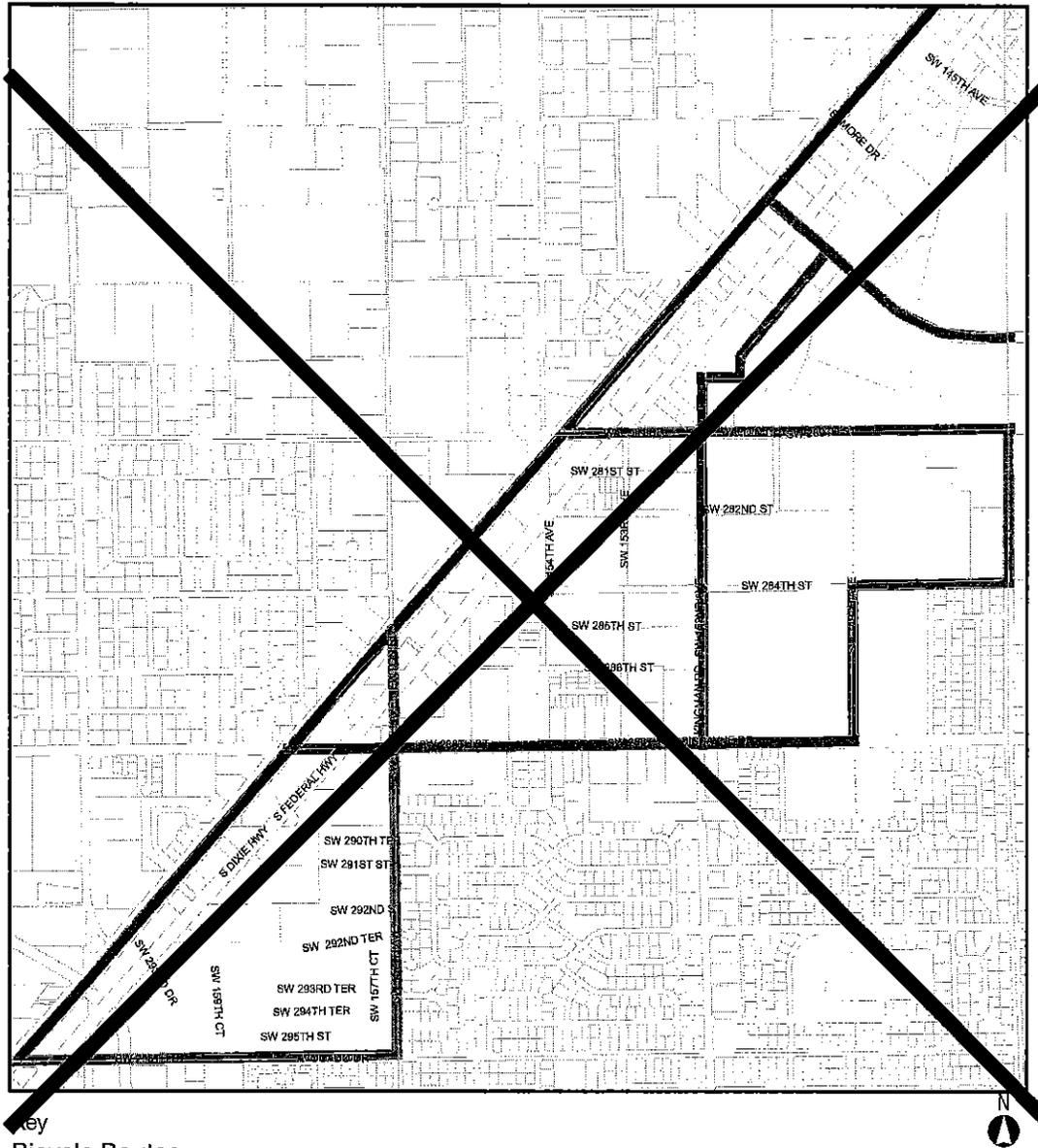


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H. Bike Route Plan

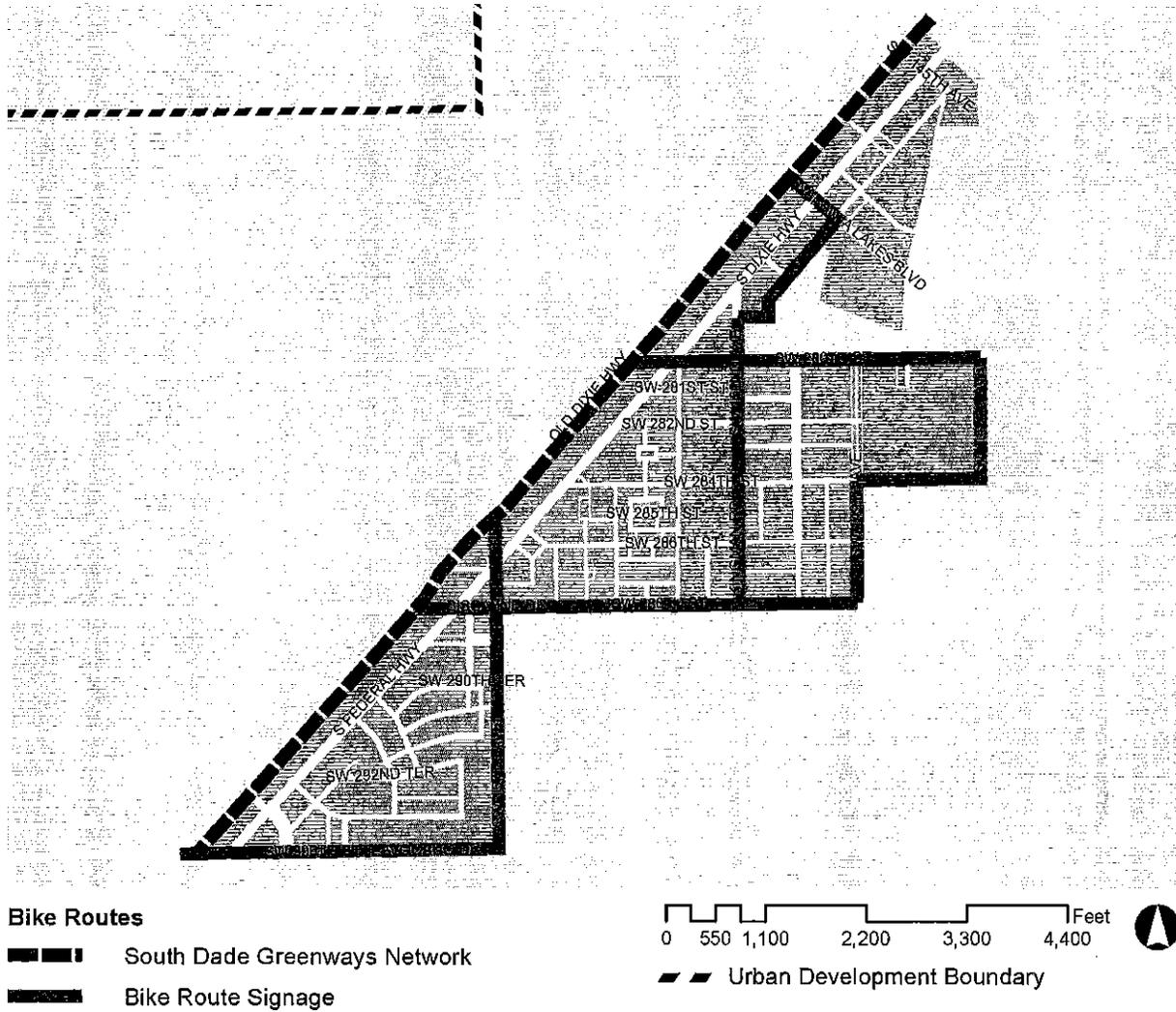
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Leisure City Community Urban Center Regulating Plans



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Section 3. Section 33-284.99.36 of the Code of Miami-Dade County, Florida, is hereby amended to read as follows:

Sec. 33-284.99.36. Building placement and street type development parameters.

- A. All new development and redevelopment within the LCUC District shall comply with the Building Placement and Design Parameters as provided in ~~[[Section 33-284.85]]~~ >>Article XXXIII(K)<< of this code.
- B. All new development and redevelopment within the LCUC District shall comply with the ~~[[Street Type Parameters]]~~ >>Streets, Service Roads and Utilities standards in Article XXXIII(K) and<< as provided herein:.

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| Street type | Minimum Required Configuration |
|---------------------------|--|
| U. S. 1 | As provided herein |
| Main Street/SW 280 Street | As provided in Section 33-284.85 (Boulevard) |
| Boulevard | As provided in Section 33-284.85 |
| Minor Street | As provided in Section 33-284.85 |
| Service Road | As provided in Section 33-284.85 |

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| Street type | Minimum Required Configuration | |
|---------------------|---------------------------------------|--------------------|
| | Core/Center | Edge |
| U.S. 1 | As provided in this section | N/A |
| Main Street | As provided in this section | N/A |
| Boulevard | Street type 1 | N/A |
| Minor Street | Street type 4 | Street type 4 or 5 |
| U.S. 1 Frontage | As provided in this section | N/A |
| N/A: not applicable | | |

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- C. ~~[[Unless otherwise provided by the Building Placement and Design Parameters in Section 33-284.85 of this Code, the following front and side-street setbacks shall be required~~

~~for mixed use development within the LCUC District]]~~
 >>The following setbacks shall be required where a Building Placement Standard in Article XXXIII(K) of this code refers to a Frontage Table<<:

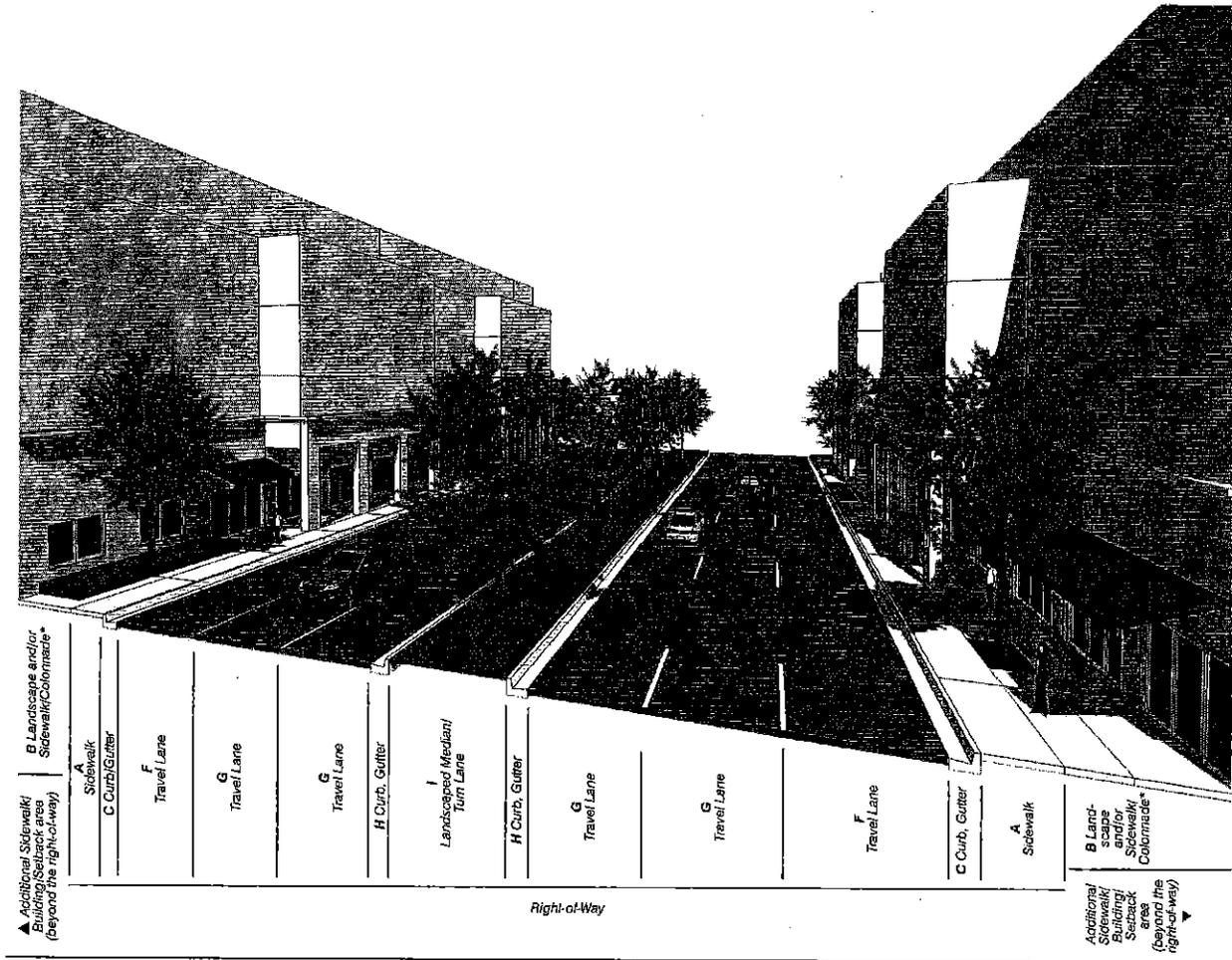
| Street Type | Required Setback | | |
|---|--|--|---------------------------|
| | Core | Center | Edge |
| U.S. 1 | 0'* [[or 10']] | [[10' or 15']] >>10'***<< | N/A |
| Main Street | 0'* | [[10'***]] >>10'***<< | N/A |
| Boulevard | [[0' or 10']] >>0'* or 6'***<< | [[0' or 10']] >>0'* or 6'***<< | [[**]] >>N/A<< |
| Minor Street | [[0' or 10']] >>6'***<< | [[10' or 15']] >>6'***<< | [[**]] >>N/A<< |
| [[Service Road]] | [[**]] | [[**]] | [[**]] |
| [[Pedestrian Passage]] | [[**]] | [[**]] | [[**]] |
| >>Busway Frontage<< | >>0'*<< | >>0'* or 6'***<< | >>N/A<< |
| Notes: N/A = not applicable * colonnades required ** [[as provided in Section 33-284.85 of this code]] >>Setback adjoining ground-story residential uses shall be landscaped and/or hard surfaced<< [[*** if a colonnade is provided, the front setback shall be 0']] | | | |

[[

| FRONTAGE ROAD ALONG EAST SIDE OF U.S.1 NORTH OF SW 293 ST. | |
|---|---|
| STREET SECTION | <p>As provided in the street types plan in section 33-284.35 of this code</p> |
| LANDSCAPE/ OPEN SPACE | <p>Parking lot buffers and street trees shall meet all requirements of Chapter 18-A of this Code and this Article, except street trees shall have a minimum diameter breast height of 4". Street trees shall be planted in an 8' continuous landscape strip. Permanent irrigation shall be required.</p> |
| PARKING | <p>N/A</p> |
| OTHER ELEMENTS | <p>The front setback along US1 shall be hard surfaced, and weather protection elements shall be provided in the building facade when the build-to line is 10' from the property line. When the build-to line is 15' from the property line, the remaining 5' shall be landscaped. Perimeter walls, fences, hedges, entrances and pedestrian pass throughs shall be provided as specified in the General Requirements.</p> |

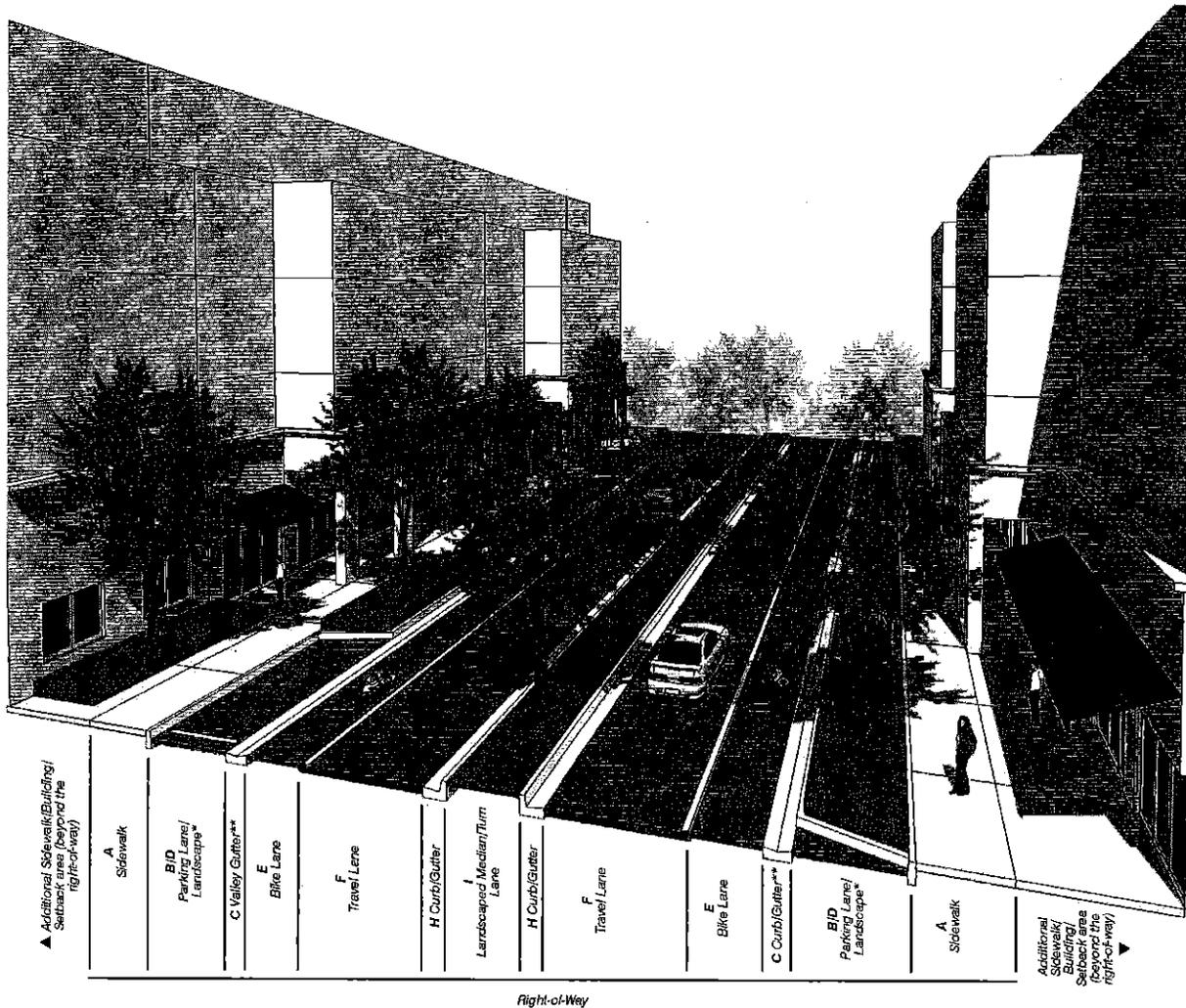
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>>D. Street Types Development Parameters.
U.S. 1



* Refer to column B in Street Types Table for required landscape elements.

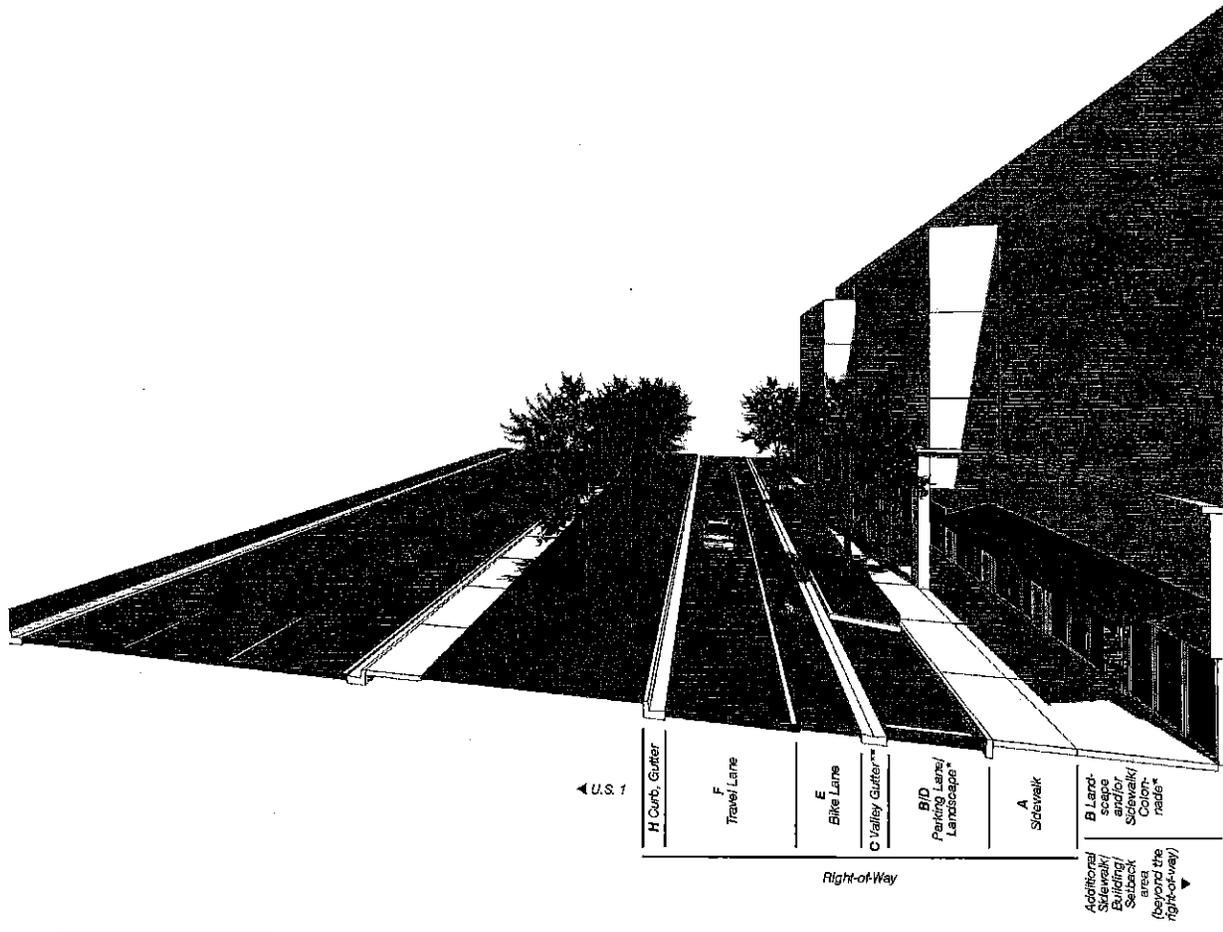
Main Street



* Refer to column B in Street Types Table for required landscape elements.

** Curb and gutter between the sidewalk and parking/travel lanes may be utilized in place of the valley gutter illustrated.

U.S 1 Frontage



* Refer to column B in Street Types Table for required landscape elements.

** Curb and gutter between the sidewalk and parking/travel lanes may be utilized in place of the valley gutter illustrated.

| Street Type | Required Elements | | | | | | | |
|---|---|---|--|--|--|---|--|---|
| | <u>A.</u> <u>Sidewalk</u> <u>(Min.) [a]</u> | <u>B.</u> <u>Land-</u> <u>scape [b,</u> <u>c, d]</u> | <u>C.</u> <u>Curb/</u> <u>Gutter [e]</u> | <u>D.</u> <u>Parking</u> <u>Lane</u> | <u>E.</u> <u>Bike</u> <u>Lane [g]</u> | <u>F, G.</u> <u>Travel</u> <u>Lanes [h]</u> | <u>H.</u> <u>Curb/</u> <u>Gutter [e]</u> | <u>I.</u> <u>Median/T</u> <u>urn Lane</u> |
| <u>U.S. 1</u> <u>Core/Center</u> | 5' | Tree grates; tree planters | 2' | N/A | N/A | 11' | 2' | 6' (Median) 10' (Turn Lane) |
| <u>Main Street</u> <u>Core/Center</u> | 6' | Tree grates; tree planters | 2' | 7' | Required where indicated on Bike Route Plan | 11' | 2' | 6' (Median) 10' (Turn Lane) |
| <u>U.S. 1</u> <u>Frontage</u> <u>Core/Center</u> | 5' | Tree grates; tree planters | 2' | 7' | Required where indicated on Bike Route Plan | 11' | N/A | N/A |
| N/A: Not Applicable [#] Footnote (as provided below) | | | | | | | | |

Footnotes:

- a. Landscape area is exclusive of the minimum sidewalk width.
- b. Street trees shall have a minimum caliper of six (6) inches at time of planting.
- c. Permanent irrigation is required.
- d. Tree grates shall have a minimum area of twenty-four (24) square feet; tree planters shall have a minimum area of thirty-two (32) square feet; continuous landscape strips shall have a minimum width of six (6) feet in the Center Sub-district, eight (8) feet in the Edge Sub-district.
- e. In all Sub-districts, curbs and gutters shall be provided at all intersections and roadway edges of arterials, boulevards and Main Street; in Core and Center Sub-districts, curbs and gutters shall be provided at all intersections and roadway edges of minor streets.

- g. Bike lanes shall be four (4) feet in width when adjacent to curb or swale; five (5) feet in width when adjacent to a parking lane.
- h. The minimum required width of one-lane/one-way travel lanes shall be determined by the Department of Public Works and Waste Management and Fire Rescue Department on a case-by-case basis during the Administrative Site Plan Review process (ASPR).<<

Section 4. Section 33-284.99.38 of the Code of Miami-Dade County, Florida, is hereby amended to read as follows:

Sec. 33-284.99.38. Non-conforming structures, uses, and occupancies.

~~[[Nothing contained in this article shall be deemed or construed to prohibit a continuation of a legal nonconforming structure, use, or occupancy in the LCUC District that either: (1) was existing as of the date of the district boundary change on the property to LCUC District; or (2) on or before said date, had received final site plan approval through a public hearing pursuant to this chapter or through administrative site plan review or had a valid building permit. However, any structure, use, or occupancy in the LCUC District that is discontinued for a period of at least six months, or is superseded by a lawful structure, use, or occupancy permitted under this chapter, or that incurs damage to the roof or structure to an extent of 50 percent or more of its market value, shall be subject to section 33-35(c) of this code. However, a lawfully existing single-family home use that is discontinued for a period of at least six months or that incurs damage to the roof or structure to an extent of 50 percent or more of its market value, shall not be subject to section 33-35(c) of this code.]]~~

>>Non-conforming Structures, Uses, and Occupancies shall be governed by the provisions of Section 33-284.89.2 of this chapter.<<

Section 5. If any section, subsection, sentence, clause or provision of this ordinance is held invalid, the remainder of this ordinance shall not be affected by such invalidity.

Section 6. It is the intention of the Board of County Commissioners, and it is hereby ordained that the provisions of this ordinance, including any sunset provision, shall become and be made a part of the Code of Miami-Dade County, Florida. The sections of this ordinance may be renumbered or relettered to accomplish such intention, and the word "ordinance" may be changed to "section," "article," or other appropriate word.

Section 7. This ordinance shall become effective ten (10) days after the date of enactment unless vetoed by the Mayor, and if vetoed, shall become effective only upon an override by this Board.

PASSED AND ADOPTED:

Approved by County Attorney as
to form and legal sufficiency:



Prepared by:



Dennis A. Kerbel