

March 27, 2024

The Honorable Blaine A. Griffin  
President, Cleveland City Council  
601 Lakeside Avenue  
Cleveland, Ohio 44113

Subject: Legislation to be Passed Under Suspension on April 1, 2024

Dear Council President Griffin:

We are requesting passage under suspension at the April 1, 2024 Cleveland City Council meeting of legislation that makes technical changes to the Residents First package, which was passed under your leadership on February 5, 2024.

These technical changes are largely out of an abundance of caution and to eliminate any potential ambiguity. These include amending Section 3103.09 to make consistent how the City provides notice within the section; Section 3104.06 to clarify the City's existing ability to recover costs under ORC 715.261; Section 3106.01 to align City definitions with ORC 4703.20; Section 3106.05 to confirm that "formal complaints" were intended to include Notices of Violation; and Section 3106.06 to clarify the application of the lead-safe ordinance.

These technical changes also address issues in the drafting, which include: removing duplicative references to Sections 365.02 and 365.04 in Section 367.99; correcting incorrect timing for City reviews in Section 3106.05; and including in Section 3104.02 a number of violations eligible for civil tickets that had been expected and discussed (such as lead violations).

Charter Section 35 requires that each ordinance amending a codified ordinance contain the entire section to be revised. This has caused the exceptional length of this document. While only five words are being added to Section 3103.09, the whole section must be included here, and that alone is 11 pages long.

Passage of this legislation will greatly facilitate the prompt implementation of the Residents First program. If you should have any questions or concerns, please contact me at your earliest convenience at 216-664-2651 or [smartin3@clevelandohio.gov](mailto:smartin3@clevelandohio.gov). Thank you.

Sincerely,

  
Sally Martin O'Toole, Director  
Department of Building & Housing

