#### Staff: Josh Kingsley, Legislative Counsel

William Hongach, Senior Legislative Policy Analyst

Jack Kern, Finance Analyst

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**THE COUNCIL**

**BRIEFING PAPER AND COMMITTEE REPORT OF THE GOVERNMENTAL AFFAIRS DIVISION**

Jeffrey Baker, Legislative Director

Rachel Cordero, Deputy Director, Governmental Affairs

**COMMITTEE ON FIRE AND EMERGENCY MANAGEMENT**

**Joseph C. Borelli, Chairman**

January 26, 2021

**OVERSIGHT:** New York City Emergency Planning

**Int. No. 849:** By Council Members Levine and Treyger

**Title:** A Local Law, in relation to creating an inter-agency natural disaster displacement assistance task force.

**Int. No. 1949:** By Council Members Cumbo, Borelli, Kallos, Moya, Ampry-Samuel, Brannan, Perkins, Ayala, Rose, Gibson and Louis

**Title:** A Local Law to amend the New York city charter, in relation to the inter-agency review of emergency plans and public reporting on such plans.

**Charter:** Amends sections 497 and 498

**Int. No. 1987:** By The Public Advocate (Mr. Williams) and Council Members Kallos and Chin

**Title:** A Local Law, in relation to the creation of a state of emergency response and recovery task force.

**Int. No. 2057:** By The Public Advocate (Mr. Williams) and Council Members Yeger, Kallos, Gibson, Chin, Ayala and Dromm

**Title:** A Local Law to amend the New York city charter, in relation to establishing an emergency student food plan.

**Admin. Code:** Adds section 30-104.1

**Int. No. 2088:** By Council Members Cabrera, Brannan, Yeger, Kallos, Louis and Chin

**Title:** A Local Law to amend the New York city charter, in relation in relation to requiring the commissioner of emergency management to report on the city's preparedness and response to citywide public health emergencies.

**Admin. Code:** Add sections 30-117

1. **INTRODUCTION**

On January 26, 2021, the Committee on Fire and Emergency Management, Chaired by Joseph C. Borelli, will hold an oversight hearing on New York City Emergency Planning. The Committee will also hear testimony on legislation, Introductions 849, 1949, 1987, 2057, and 2088, which all relate to local emergency planning and response. Those expected to testify include representatives of New York City Emergency Management (“NYCEM”), unions, non-profit organizations, and other interested parties.

1. **BACKGROUND**

*New York City Emergency Management*

NYCEM is a charter agency tasked with coordinating the City's multi-agency response to all emergency conditions and potential incidents that affect public health and safety, such as severe weather threats from natural hazards and disasters, power and other public service outages, hazardous substance discharges, building collapses, aviation disasters, and acts of terrorism.[[1]](#footnote-1) In addition to coordinating multi-agency emergency responses, NYCEM is responsible for ensuring emergency preparedness through developing emergency plans, educating the public, hosting disaster response training and exercises, collecting and disseminating critical information during emergencies, and collaborating emergency responses with other local, state, federal, nonprofit and private sector entities.

*Citywide Incident Management System*

New York City’s implementation of the U.S. Department of Homeland Security's National Incident Management System (“NIMS”) is done through the Citywide Incident Management System (“CIMS”), which guides the City’s response to emergencies, hazardous incidents, and planned events. [[2]](#footnote-2) Formalized by Mayoral Executive Order 63, dated April 11, 2005,[[3]](#footnote-3) CIMS establishes emergency protocols including defining the organizational command structure for multi-agency emergency response, and the designation of roles, responsibilities and authority of government, nonprofit and private sector entities performing and supporting emergency response.[[4]](#footnote-4)

According to NYCEM, key components of the CIMS protocol:

* Defines how citywide emergencies or multiple large-scale incidents will be managed.
* Defines agency roles and responsibilities at emergency incidents.
* Establishes the NIMS Incident Command System (ICS) standard as NYC's incident management system.
* Defines the ICS organizational structure.
* Establishes means of integrating regional, state, and federal agencies into a NYC response.
* Describes the operational implementation of CIMS.
* Defines how incident operations, including life safety, investigation, site management and recovery/restoration, are prioritized, and when they can be concurrently implemented.
* Establishes a process for after-action review and critique of emergency responses and implementing lessons learned.
* Defines ICS implementation and training requirements for NYC agencies participating in citywide response. [[5]](#footnote-5)

The Incident Command System (“ICS”), adopted within CIMS protocol, is a standardized hierarchical command structure that facilitates cooperative responses by multiple agencies, both within and outside of government, to organize and coordinate emergency response activities. Pursuant to ICS organizational structure, a “Command Element,” is “responsible for overall incident management and has the authority to make strategic and tactical decisions regarding the mitigation of the incident, define the Incident Objectives and determine what resources are required for the incident.”[[6]](#footnote-6) Depending on the nature of the incident, the Command Elements can be either assigned to a single agency or consist of unified command of multiple agencies.

CIMS further identifies the “core competencies,” of the various city agencies, which are “functional areas of expertise that relate specifically to tactical operations,” [[7]](#footnote-7) with each agency authorized to “direct operations related to their Core Competencies at incidents.”[[8]](#footnote-8) For example, the Fire Department (“FDNY”) has core competencies of fire suppression, pre-hospital care, search and rescue, structural evacuations, hazmat decontamination, and arson investigation. Whereas, the core competencies for Department of Health and Mental Hygiene (“DOHMH”) include disease surveillance and epidemiology, mass vaccinations, and public health orders.[[9]](#footnote-9)

Depending the nature of the incident or emergency, CIMS protocol designates “Primary Agencies,” based on relevant core competencies, to lead emergency response and serve as the incident Command Element. For example, the Police Department (“NYPD”), NYCEM, FDNY, and the Departments of Sanitation and Transportation are Primary Agencies in responding to natural disasters and weather emergencies; whereas during public health emergencies such responses are led by DOHMH, NYPD and FDNY.[[10]](#footnote-10)

Finally, CIMS outlines NYCEM’s roles and responsibilities within the inter-agency structure of CIMS. These roles generally involve coordinating on-scene emergency response activities, activating the City’s Emergency Operation Center to ensure centralized information sharing and decision-making, and leading after-action assessments of agency operations following an incident.[[11]](#footnote-11)

*Community Emergency Response Teams*

NYCEM, in collaboration with the FDNY and NYPD, manages a system of Community Emergency Response Teams (“CERT”), which consist of dedicated volunteers who assist with local emergency preparedness and provide on-the-ground assistance to City agencies in emergency response.[[12]](#footnote-12) NYC CERT members undergo an intensive 10-week training program to learn about emergencies and disasters and the basic response skills needed to assist during a disaster.[[13]](#footnote-13) Additionally, NYC CERT members support their communities by assisting with emergency education and response.[[14]](#footnote-14) During non-emergency situations, NYC CERTs educate their communities about emergency preparedness by building community disaster networks and working with the Ready New York program, which provides City residents with multi-lingual guides that inform residents about basic emergency response preparedness.[[15]](#footnote-15)

1. **New York City Emergency Plans**

*NYCEM Coordinated Plans*

While CIMS serves as the foundational protocol governing multi-agency collaboration in emergency response, NYCEM also maintains plans to guide the City’s responses to specific emergency circumstances and related operations. Notably, pursuant to Local Law, NYCEM is responsible for developing emergency plans related to the City’s preparedness for coastal storms, severe weather conditions and natural disasters.[[16]](#footnote-16) These plans include specific operational protocols related to multi-agency response to such emergencies, including: (i) snow preparedness and response; (ii) food and water access; (iii) sheltering; (iv) recovery for communities and small businesses, including non-profits; (v) traffic management; (vi) fuel management; (vii) shelters for individuals with special needs; and (viii) outreach and recovery for homebound and vulnerable individuals.[[17]](#footnote-17)

Pursuant to Local Law, NYCEM is also required to conduct after-action assessments of coastal storm, severe weather and natural disaster related plans. After activation of any such plan, NYCEM is required to “assess [such] plan … [and] consider the reports and recommendations issued by any task force or commission following such activation.”[[18]](#footnote-18) Additionally, NYCEM is required to assess all such plans at least once every two years, regardless of whether such plan was activated during that timeframe.[[19]](#footnote-19) Further, NYCEM is required to report to the City Council on any subsequent changes and to provide updated versions of such plans after an assessment is completed.[[20]](#footnote-20) According to NYCEM, emergency plans should be viewed as “living documents” to be regularly updated based on lessons learned from prior emergencies or in order to reflect changing circumstances; for example, the City’s Heat Emergency Plan was updated earlier this year as the City adapted procedures to make necessary public health accommodations arising from COVID-19.

Finally, in addition to maintaining detailed plans for responding to coastal storms and severe weather emergencies, NYCEM has plans and protocols for managing the logistical response to other emergency circumstance, such as: power disruptions, debris management, mutual aid protocols, donation management, and commodity distribution.

*Agency Specific Plans*:

The above-discussed plans represent a universe of inter-agency emergency plans generally coordinated and managed by NYCEM; however, there are also agency-specific plans to direct the City response to different specific emergency circumstances. For example, the Department of Sanitation (“DSNY”) maintains a snow plowing plan, and DOHMH is responsible for pandemic planning. According to NYCEM, these plans are “hosted” within each agency with that specific subject matter expertise and updated “organically.”

1. **ISSUES AND CONCERNS**

For the oversight portion of the hearing, the Committee is interested in examining the process by which NYCEM, and other City agencies, develop plans for responding to large-scale emergencies.   Specifically, the Committee plans to examine how NYCEM communicates and coordinates with other City agencies, including during the pre-planning stages and the actions taken during impending disasters.  Additionally, the Committee would like to examine: (i) NYCEM’s on-the-ground coordination of City agencies, particularly FDNY, NYPD, and DOHMH; (ii) the City’s communication with the public prior to, during and after emergencies/disasters; (iii) how the City coordinates evacuations; and (iv) how the City prepares for the increase in emergency service needs, as well agency staffing surges, during disasters. Lastly, the Committee is interested in the Administration’s testimony and comments on the proposed legislation being considered.

1. **LEGISLATIVE ANALYSIS**

**Int. No. 849**

This bill would create an inter-agency task force to examine the City’s efforts to provide assistance and services to individuals relocating to New York City after being displaced by natural disaster events elsewhere. The task force would be required to evaluate current practices, and to make recommendations on potential changes to relevant laws or policies, and prepare a report of its findings and recommendations to the Mayor and the Speaker of the City Council.

**Int. No. 1949**

This bill would require New York City Emergency Management to ensure the periodic review of all plans guiding the City’s response to, and ensuring the continuity of agency operations, during emergency circumstances. Representatives from all relevant city agencies would be required to participate in this review. Additionally, the bill would require that summaries detailing the provisions of such plans be posted online, and procedures would be developed to provide the public with an opportunity to comment on the substance of such plans.

**Int. No. 1987**

This bill would establish a task force responsible for reviewing emergency plans of each City agency and issuing annual reports on recommended changes to such plans addressing potential deficits as identified by the task force. The task force would be composed of nine members, including the Commissioner of Emergency Management, as well as individuals appointed by the Mayor, the Speaker of the Council and the Public Advocate. The task force would be required to meet quarterly and conduct at least one public hearing per year.

**Int. No. 2057**

This bill would require New York City Emergency Management, in consultation with the Mayor’s Office of Food Policy and the Department of Education (“DOE”), to develop a plan to provide students with breakfast, lunch and dinner in the event that City schools are ordered closed, or when any form of remote learning is being used by the DOE. The DOE already provides free breakfast, lunch and afterschool meals to all NYC public school students during the school year, and this bill would ensure food security for vulnerable students in the event school buildings are closed due to an emergency or public health crisis.

**Int. No. 2088**

This bill would require New York City Emergency Management to submit an annual report to the Council describing the City’s preparation for, and response to, to public health emergencies.  The required report would include: a description of any City actions taken in preparation for, during, and immediately after such incident; a list of all city agencies, offices, or private entities that were involved in the City’s emergency response; a description of the City’s current public healthcare workforce and ways to improve medical surge capacity; and guidelines for notifying and communicating with the public and City officials during a local public health emergency.

Int. No. 849

By Council Members Levine and Treyger

A Local Law in relation to creating an inter-agency natural disaster displacement assistance task force

..Body

Be it enacted by the Council as follows:

Section 1. Natural disaster displacement assistance task force. a. There is hereby established an inter-agency natural disaster displacement assistance task force that shall review and recommend changes to the laws, rules, regulations, and policies related to providing emergency, short-term support to individuals that have relocated to the city of New York after being displaced from their homes by coastal storms, severe weather, or natural disaster events.

b. The natural disaster displacement assistance task force shall, at minimum, perform the following actions and propose changes to the laws, rules, regulations, and policies where appropriate:

1. identify the immediate resettlement needs of individuals relocating to the city on account of natural disaster displacement, including but not limited to, shelter, healthcare, food, clothing, and basic toiletries;

2. identify the legal and social services needs of such individuals, including but not limited to, disaster relief claim assistance, case management, mental health support, long-term healthcare access, housing assistance, workforce development, and youth and adult education programs;

3. identify and evaluate how the city identifies displaced individuals, assesses their legal and social services needs and screens for local, state, or federal benefit eligibility;

4. identify and evaluate public and private programs available to assist individuals filing disaster relief claims or applying for local, state, or federal benefits;

5. identify and evaluate how the city conducts outreach regarding city services available to displaced individuals, including an assessment of how the city reaches individuals with limited-English language proficiency;

6. identify, evaluate, and encourage coordination among appropriate city, state, and federal agencies and other relevant organizations with regard to supporting individuals displaced by natural disaster;

7. identify and evaluate the city’s capacity to quickly scale services in response to surges in displaced individuals in need of immediate assistance upon relocating to the city;

8. identify and evaluate the state and federal financing sources available to the city to meet the services needs of individuals displaced by natural disaster events; and

9. propose changes to laws, rules, regulations, and policies, as appropriate.

c. Such task force shall be led by the commissioner of the office of emergency management, or by the head of such other office or agency as the mayor may designate, and shall include at a minimum:

1. the commissioners of the following agencies or offices or such commissioners’ designees:

(a) the administration for children’s services;

(b) department of social services;

(c) department of homeless services;

(d) department of health and mental hygiene;

(e) department for the aging; and

(f) mayor’s office for people with disabilities;

2. the chancellor of the city school district, or their designee;

3. the coordinator of the office of civil justice, or their designee; and

4. representatives of other such agencies or offices as the mayor may designate.

d. Such task force shall meet regularly in furtherance of its functions and at any other time at the request of the commissioner or other designated task force leader.

e. No later than September 1, 2018, the task force shall submit to the mayor and the speaker of the council a report concerning the task force’s activities, its findings and recommendations pursuant to subdivision b of this section.

f. Such task force shall dissolve upon submission of the report required pursuant to subdivision e of this section.

§ 2. This local law takes effect immediately.

Int. No. 1949

By Council Members Cumbo, Borelli, Kallos, Moya, Ampry-Samuel, Brannan, Perkins, Ayala, Rose, Gibson and Louis

..Title

A Local Law to amend the New York city charter, in relation to the inter-agency review of emergency plans and public reporting on such plans

..Body

Be it enacted by the Council as follows:

Section 1. Subdivision j of section 497 of the New York city charter, as added by vote of the electors on November 6, 2001, is amended to read as follows:

j. coordinate with all city agencies to ensure that all such agencies develop, [and] implement and periodically review emergency response plans in connection with planning major city events and other emergency circumstances;

§ 2. Section 498 of the New York city charter, as added by vote of the electors on November 6, 2001, is amended to read as follows:

Section 498. Agency cooperation and review of emergency plans. a. The department shall be the lead agency in the coordination and facilitation of resources in incidents involving public safety and health, including incidents which may involve acts of terrorism. All agencies shall provide the department promptly with all information relevant to the performance of the emergency management functions and shall collect and make available any information requested by the department for use in emergency planning. All agencies further shall promptly provide the department with all appropriate material, equipment and resources needed for emergency management functions, including personnel.

b. No later than two years after the effective date of the local law that created this subdivision, and every two years thereafter, the department shall convene a working group from all relevant agencies to review all plans established by the department or any city agency for the purpose of guiding the city’s response to, and ensuring the continuity of agency operations during, emergency circumstances.

c. Following each review conducted pursuant to subdivision b of this section, the department shall publish on its website a full list of all emergency plans reviewed and the relevant city agencies involved in the review of each such plan. The department or relevant city agency shall publish a summary of each such plan, including information on agency roles and responsibilities, on its respective website.

d. The department shall establish procedures through which members of the public can submit public comments on emergency planning and maintain a public record of such comments.

§ 2. This local law takes effect immediately.

Int. No. 1987

By The Public Advocate (Mr. Williams) and Council Members Kallos and Chin

..Title

A Local Law in relation to the creation of a state of emergency response and recovery task force

..Body

Be it enacted by the Council as follows:

Section 1. Definitions. For purposes of this local law, the following terms have the following meanings:

Emergency plan. The term “emergency plan” means a plan made by a city agency to respond to a declared state of emergency.

State of emergency. The term “state of emergency” means a declaration of a local state of emergency by the mayor or a declaration of a state disaster emergency by the governor, provided that the city of New York, or some portion thereof, is also declared an affected area.

§ 2. Task force established. There is hereby established a task force to be known as the state of emergency response and recovery task force.

§ 3. Duties. The task force shall review every city agency’s emergency plan and shall make recommendations for legislation and policy to address any concerns identified.

§ 4. Membership. a. The task force shall be composed of the following members:

1. The commissioner of emergency management or such commissioner’s designee, who shall serve as co-chair of the task force;

2. Three members appointed by the public advocate, one of whom shall serve as co-chair of the task force;

3. Three members appointed by the mayor; and

4. Two members appointed by the speaker of the council.

b. All appointments required by this section shall be made no later than 60 days after the effective date of this local law.

c. Each member of the task force shall serve at the pleasure of the officer who appointed the member. In the event of a vacancy on the task force, a successor shall be selected in the same manner as the original appointment. All members of the task force shall serve without compensation.

§ 5. Meetings. a. The co-chairs shall convene the first meeting of the task force no later than 30 days after the last member has been appointed.

b. The task force may invite relevant experts and stakeholders to attend its meetings and to otherwise provide testimony and information relevant to its duties.

c. The task force shall meet no less than once each quarter to carry out the duties described in section three and may hold additional meetings as deemed necessary by the co-chairs. The task force shall hold at least one public hearing each year.

§ 6. Report. a. No later than 1 year after the effective date of this local law, and annually thereafter, the task force shall submit a report to the mayor, the speaker of the council and the public advocate, setting forth its recommendations for legislation and policy relating to each agency’s emergency plan. The report shall include a summary of information the task force considered in formulating its recommendations.

b. The commissioner of emergency management shall publish the task force’s report electronically on the emergency management department’s website no later than 30 days after its submission to the mayor, the speaker of the council and the public advocate.

§ 7. Agency support. Each agency affected by this local law shall provide appropriate staff and resources to support the work of such agency related to the task force.

§ 8. Effective date. This local law takes effect immediately.

Int. No. 2057

By The Public Advocate (Mr. Williams) and Council Members Yeger, Kallos, Gibson, Chin, Ayala and Dromm

..Title

A Local Law to amend the administrative code of the city of New York, in relation to establishing an emergency student food plan..Body

Be it enacted by the Council as follows:

Section 1. The administrative code of the city of New York is amended by adding a new section 30-104.1 to read as follows:

§ 30-104.1 Emergency student food plan. a. Definitions. For purposes of this section, the following terms have the following meanings: Chancellor. The term “chancellor” means the chancellor of the city school district of the city of New York.

School. The term “school” means any elementary, middle or high school within the jurisdiction of the New York city department of education and in any educational facility owned or leased by the city of New York, holding some combination thereof, including, but not limited to, district 75 schools.

Student. The term “student” means any pupil under the age of 21 as of September first of the academic period being reported, who does not have a high school diploma and who is enrolled in a school as school is defined in this subdivision.

b. In consultation with the office of food policy and the department of education and any other city agency the commissioner deems appropriate, the commissioner shall develop or update, no later than December 31, 2020, a student food plan to be used when schools are ordered closed pursuant to an order by the governor, mayor or the chancellor, or when any form of remote learning is used by the department of education. Such plan shall include, but not be limited to the following features, provided that nothing herein shall be construed to interfere with the ability of agencies responding to an emergency to implement plans, modify plans, or take steps not described in any written plan, in a manner appropriate to circumstances particular to that emergency:

1. A description of how the city will provide students with access to breakfast, lunch and dinner, including but not limited to how and to what extent the city will disseminate information to the public about the availability of food; manage requests for support from emergency, not-for-profit entities that provide food and water; arrange for or coordinate disaster feeding for students; and coordinate food donations, food business and emergency food providers that may want to provide for feeding students;

2. A description of how the city personnel responsible for implementing such plan will be identified, including how a clear hierarchy and points of contact of such personnel will be established;

3. If used, criteria for how food distribution points are identified and how such distribution points will be publicized to ensure that the public is aware of the locations of such distribution points; and

4. A mechanism to provide that, to the extent practicable, all public communications, written or otherwise, are available in the most commonly spoken languages of affected communities; and

5. Any other contingencies the director deems appropriate.

c. The plan required pursuant to subdivision b of this section shall be publicly posted on the department of education website. Any modifications to the plan shall be posted within 30 days.

§ 2. This local law takes effect immediately.

Int. No. 2088

By Council Members Cabrera, Brannan, Yeger, Kallos, Louis and Chin

..Title

A Local Law to amend the administrative code of the city of New York, in relation to requiring the commissioner of emergency management to report on the city’s preparedness and response to citywide public health emergencies

..Body

Be it enacted by the Council as follows:

Section 1. Chapter 1 of title 30 of the administrative code of the city of New York is amended by adding a new section 30-117 to read as follows:

§ 30-117 Annual public health emergency preparedness and response report a. No later than 60 days after the effective date of the local law that added this section, and on or before every December 1 thereafter, the commissioner shall submit to the council and make available on the city’s website a report describing the city’s preparation for, and response to, any state disaster emergency or local state of emergency declared in relation to an infectious disease that affects the city which occurred during the preceding twelve month period. Such report shall describe any actions taken in preparation for, during and immediately after such incident by the department, city agencies and private entities that were involved in the city’s public health emergency preparedness and response efforts.

b. Such report shall include, but need not be limited to, the following:

1. A list of any local public health warnings or declarations issued by the city or state during the reporting period and actions taken pursuant to each such warning or declaration;

2. A description of the city’s current public healthcare workforce and its capabilities to improve workforce surge capacity;

3. A list of all city and state agencies or offices and private entities that were involved in the city’s public health preparedness and response efforts, including a description of each such agency, office or entity;

4. An assessment of actions taken by each such agency, office or entity for each declared public health emergency during the reporting period, including an assessment of interagency coordination;

5. Guidelines for notifying and communicating with the public and city officials during a local public health emergency; and

6. Recommendations for improving the city’s public health emergency preparedness and response efforts including, but not limited to, revisions to emergency preparedness plans and other relevant protocols of city agencies or offices.

§ 2. This local law takes effect immediately.

1. See generally New York City Charter §497 [↑](#footnote-ref-1)
2. Citywide Incident Management System, available at: <https://www1.nyc.gov/site/em/about/citywide-incident-management-system.page>. [↑](#footnote-ref-2)
3. Mayoral Executive Order 63, dated April 11, 2005; available at: <https://www1.nyc.gov/assets/records/pdf/executive_orders/2005EO061.pdf>. [↑](#footnote-ref-3)
4. Citywide Incident Management System, available at: <https://www1.nyc.gov/site/em/about/citywide-incident-management-system.page>. [↑](#footnote-ref-4)
5. Citywide Incident Management System, available at: <https://www1.nyc.gov/site/em/about/citywide-incident-management-system.page>. [↑](#footnote-ref-5)
6. NYCEM CIMS Table; available at: <https://www1.nyc.gov/assets/em/downloads/pdf/Appendix_cims_charts.pdf>. [↑](#footnote-ref-6)
7. NYCEM CIMS Table; available at: <https://www1.nyc.gov/assets/em/downloads/pdf/Appendix_cims_charts.pdf>. [↑](#footnote-ref-7)
8. Id. [↑](#footnote-ref-8)
9. Id. [↑](#footnote-ref-9)
10. Id. [↑](#footnote-ref-10)
11. Id. [↑](#footnote-ref-11)
12. NYC CERT at <http://www1.nyc.gov/site/em/community_business/nyc-cert.page> [↑](#footnote-ref-12)
13. Id. [↑](#footnote-ref-13)
14. Id. [↑](#footnote-ref-14)
15. Ready NY, NYCEM; available at: <https://www1.nyc.gov/site/em/ready/ready-new-york.page>. [↑](#footnote-ref-15)
16. Admin. Code §30-102. [↑](#footnote-ref-16)
17. See Admin. Code §§30-103, 30-104, 30-105, 30-106, 30-107, 30-108, 30-109, 30-110 and 30-111. [↑](#footnote-ref-17)
18. Admin. Code 30-112. [↑](#footnote-ref-18)
19. Id. [↑](#footnote-ref-19)
20. Id. [↑](#footnote-ref-20)