

ORDINANCE NO. 274

AN ORDINANCE OF THE CITY COUNCIL OF THE CITY OF CANYON LAKE, CALIFORNIA, REPEALING ORDINANCE NO. 252 AND ADDING CHAPTER 3.48 (TRANSPORTATION UNIFORM MITIGATION FEE PROGRAM) TO TITLE 3 (REVENUE AND FINANCE) OF THE CANYON LAKE MUNICIPAL CODE RELATING TO THE WESTERN RIVERSIDE COUNTY TRANSPORTATION UNIFORM MITIGATION FEE PROGRAM AND ESTABLISHING ANNUAL CONSTRUCTION COST INDEX ADJUSTMENTS

WHEREAS, the City of Canyon Lake is a member agency of the Western Riverside Council of Governments (“WRCOG”), a joint powers agency comprised of the County of Riverside and 18 cities located in Western Riverside County; and

WHEREAS, acting in concert, the WRCOG member agencies developed a plan whereby the shortfall in funds needed to enlarge the capacity of the Regional System of Highways and Arterials in Western Riverside County (the “Regional System”) could be made up in part by a Transportation Uniform Mitigation Fee (“TUMF”) on future residential, commercial, and industrial development; and

WHEREAS, the TUMF Program is supported by nexus studies prepared pursuant to Government Code sections 66000 *et seq.* (the Mitigation Fee Act), which demonstrate a reasonable relationship between new development and the need for regional transportation improvements; and

WHEREAS, the City previously adopted ordinances participating in the TUMF Program and authorizing the collection of the TUMF on new development within the City; and

WHEREAS, the WRCOG Executive Committee periodically updates the TUMF Nexus Study and Administrative Plan to reflect updated land use assumptions, transportation improvements, and construction costs; and

WHEREAS, the most recent update, in September 2024, the WRCOG Executive Committee reviewed the 2024 Nexus Study and TUMF Program and recommended TUMF member agencies amend their applicable TUMF ordinances to reflect changes in the TUMF network and the cost of construction in order to update the TUMF Program; and

WHEREAS, on April 9, 2025, the City Council approved the Western Riverside County Transportation Uniform Mitigation Fee Program Ordinance of 2024 (“Ordinance No. 252”), which amended and superseded prior TUMF ordinances to update the City’s participation in the WRCOG TUMF Program consistent with the 2024 Nexus Study; and

WHEREAS, Ordinance No. 252 was adopted as an uncodified ordinance and the City Council now desires to repeal Ordinance No. 252 and codify the City’s participation in the TUMF Program into the Canyon Lake Municipal Code, including provisions for annual Construction Cost Index (“CCI”) adjustments; and

WHEREAS, the TUMF Administrative Plan calls for a CCI adjustment to be brought forth to the WRCOG Executive Committee on an annual basis; and

WHEREAS, on December 1, 2025, the WRCOG Executive Committee approved the implementation of an automatic CCI adjustment for all TUMF land uses tied to the September indices of the National Association of Realtors and Engineering News Record with a cap at 5% of any annual adjustments; and

WHEREAS, an automatic CCI adjustment ensures that fee levels keep pace with increases in cost of constructing transportation projects and avoids large increases at comprehensive TUMF Nexus Study updates; and

WHEREAS, this approach also allows for consistency and predictability for the TUMF Program, while ensuring that the fair share principles under AB 1600 are satisfied; and

WHEREAS, the City Council desires to provide for automatic inflationary adjustments to the TUMF to reflect changes in construction costs over time, without modifying the underlying fee nexus, land use assumptions, or fee methodology; and

WHEREAS, in codifying the City's participation in the TUMF Program into the Municipal Code, the City Council also finds it appropriate to clarify and update certain definitions related to residential land uses to ensure consistency with current development patterns, state housing law, and WRCOG TUMF land use classifications.

THE CITY COUNCIL OF THE CITY OF CANYON LAKE, CALIFORNIA, DOES ORDAIN AS FOLLOWS:

Section 1. **Incorporation.** The above recitals are all true and correct and are incorporated herein by this reference.

Section 2. **CEQA.** The adoption of this Ordinance is not subject to the California Environmental Quality Act because the activity will not result in a direct or reasonably foreseeable indirect physical change in the environment.

Section 3. **Repeal of Ordinance No. 252.** Ordinance No. 252, adopted April 9, 2025, relating to the City's participation in the Western Riverside County Transportation Uniform Mitigation Fee (TUMF) Program, is hereby repealed in its entirety. The provisions of Chapter 3.48 of the Canyon Lake Municipal Code, as adopted by this Ordinance, shall supersede and replace Ordinance No. 252.

Section 4. **Effect of Repeal of Ordinance No. 252.** The repeal of Ordinance No. 252 shall not affect any TUMF obligation, fee calculation, credit agreement, reimbursement agreement, appeal, enforcement action, administrative determination, pending application, approval, or vested right existing or accrued prior to the effective date of this Ordinance. All such matters shall remain valid and enforceable and shall continue to be administered in accordance with Chapter 3.48 of the Canyon Lake Municipal Code and the TUMF Program.

Section 5. Municipal Code Amendment. TITLE 3, REVENUE AND FINANCE, CHAPTER 3.48 TRANSPORTATION UNIFORM MITIGATION FEE PROGRAM is hereby added to read as follows:

CHAPTER 3.48 TRANSPORTATION UNIFORM MITIGATION FEE PROGRAM

- 3.48.010 Participation in Transportation Uniform Mitigation Fee Program.
- 3.48.020 Definitions.
- 3.48.030 Establishment of the Transportation Uniform Mitigation Fee.
- 3.48.040 Exemptions.
- 3.48.050 Annual Construction Cost Index Adjustment.
- 3.48.060 Reimbursements.
- 3.48.070 Procedures for Levy, Collection and Disposition of Fees.
- 3.48.080 TUMF Administrator.

- 3.48.010 Participation.

]The City participates in the Western Riverside County Transportation Uniform Mitigation Fee (“TUMF”) Program administered by the Western Riverside Council of Governments (“WRCOG”). The purpose of the TUMF is to fund transportation improvements to the Regional System of Highways and Arterials in Western Riverside County that are necessary to mitigate the cumulative traffic impacts of new development. The TUMF shall apply to all new development within the City, unless otherwise exempt pursuant to this Chapter or the TUMF Administrative Plan.

- 3.48.020 Definitions.

For the purpose of this Chapter, the following words, terms and phrases shall have the following meanings:

- a. *Class ‘A’ Office* means an office building that is typically characterized by high quality design, use of high end building materials, state of the art technology for voice and data, on-site support services/maintenance, and often includes full service ancillary uses such as, but not limited to a bank, restaurant/office coffee shop, health club, printing shop, and reserved parking. The minimum requirements of an office building classified as Class ‘A’ Office shall be as follows: (i) minimum of three stories (exception will be made for March JPA, where height requirements exist); (ii) minimum of 10,000 square feet per floor; (iii) steel frame construction; (iv) central, interior lobby; and (v) access to suites shall be from inside the building unless the building is located in a central business district with major foot traffic, in which case the first floor may be accessed from the street to provide entrances/ exits for commercial uses within the building.
- b. *Class ‘B’ Office* means an office building that is typically characterized by high quality design, use of high end building materials, state of the art technology for voice and data, on-site support services/maintenance, and often includes full service ancillary uses such as, but not limited to a bank, restaurant/office coffee shop, health club, printing shop, and reserved parking. The minimum requirements of an office building classified as Class ‘B’

Office shall be as follows: (i) minimum of two stories; (ii) minimum of 15,000 square feet per floor; (iii) steel frame, concrete or masonry shell construction; (iv) central, interior lobby; and (v) access to suites shall be from inside the building unless the building is located in a central business district with major foot traffic, in which case the first floor may be accessed from the street to provide entrances/exits for commercial uses within the building.

- c. *Development Project or Project* means any project undertaken for the purposes of development, including the issuance of a permit for construction.
- d. *Gross Acreage* means the total property area as shown on a land division of a map of record or described through a recorded legal description of the property. This area shall be bound by road rights of way and property lines.
- e. *Habitable Structure* means any structure or part thereof where persons reside, congregate or work and which is legally occupied in whole or part in accordance with applicable building codes, and state and local laws.
- f. *Industrial Project* means any development project that proposes any industrial or manufacturing use allowed in the following zoning classifications: I-P, M-S-C, M-M, M-H, M-R, M-R-A, A-1, A-P, A-2, A-D, W-E, or SP with one of the aforementioned zones used as the base zone.
- g. *Low Income Residential Housing* means Residential Affordable Units: (A) for rental housing, the units shall be made available, rented and restricted to “lower income households” (as defined in Health and Safety Code Section 50079.5) at an “affordable rent” (as defined in Health and Safety Code Section 50053). Affordable units that are rental housing shall be made available, rented, and restricted to lower income households at an affordable rent for a period of at least fifty-five (55) years after the issuance of a certificate of occupancy for new residential development. and (B) for for-sale housing, the units shall be sold to “persons or families of low or moderate income” (as defined in Health and Safety Code Section 50093) at a purchase price that will not cause the purchaser’s monthly housing cost to exceed “affordable housing cost (as defined in Health and Safety Code Section 50052.5) Affordable units that are for- sale housing units shall be restricted to ownership by persons and families of low or moderate income for at least forty-five (45) years after the issuance of a certificate of occupancy for the new residential development.
- h. *Multi-Family Residential Unit* means a residential dwelling unit that is physically attached to one or more other dwelling units by a shared wall, floor, ceiling, roof, or structural foundation, regardless of the lot or parcel configuration, ownership structure, or type of subdivision (including condominium subdivisions). Multi-family residential units include, but are not limited to, duplexes, townhomes, apartments, and condominiums with attached units. As outlined in the Chapter, accessory dwelling units (ADUs) and junior accessory dwelling units (JADUs), as defined by state law, are exempt from TUMF and shall not be counted in determining residential land use classification.
- i. *Non-Residential Unit* means retail commercial, service commercial and industrial development, which is designed primarily for non-dwelling use, but shall include hotels and motels.
- j. *Recognized Financing District* means a Financing District as defined in the TUMF Administrative Plan as may be amended from time to time.

- k. *Residential Dwelling Unit* means a building or portion thereof used by one (1) family and containing but one (1) kitchen, which is designed primarily for residential occupancy including single-family and multi-family dwellings. “Residential Dwelling Unit” shall not include hotels or motels.
- l. *Retail Commercial Project* means any development project that proposes any retail commercial activity use not defined as a service commercial project allowed in the following zoning classifications: R-1, R-R, R-R-O, R- 1-A, R-A, R-2, R-2-A, R-3, R-3-A, R-T, R-T-R, R-4, R-5, R-6, C-1/C-P, C-T, C-P-S, C-R, C-O, R-V-C, C-V, W-2, R-D, N-A, W-2-M, W-1, or SP with one of the aforementioned zones used as the base zone, which can include any eating/dining facility residing on the retail commercial development premises.
- m. *Service Commercial Project* means any development project that is predominately dedicated to business activities associated with professional or administrative services, and typically consists of corporate offices, financial institutions, legal, and medical offices eating/dining facilities, and other uses related to personal or professional services.
- n. *Single Family Residential Unit* means a residential dwelling unit that is physically detached from any other dwelling unit, sharing no common wall, floor, ceiling, roof, or structural foundation with another dwelling unit, regardless of the lot or parcel configuration, ownership structure, or type of subdivision (including condominium subdivisions). As outlined in the Chapter, accessory dwelling units (ADUs) and junior accessory dwelling units (JADUs), as defined by state law, are exempt from TUMF and shall not be counted in determining residential land use classification.
- o. *TUMF Participating Jurisdiction* means a jurisdiction in Western Riverside County which has adopted and implemented an ordinance authorizing participation in the TUMF Program and complies with all regulations established in the TUMF Administrative Plan, as adopted and amended from time to time by the WRCOG.
- p. *Disabled Veteran* means any veteran who is retired or is in process of medical retirement from military service who is or was severely injured in a theatre of combat operations and has or received a letter of eligibility for the Veterans Administration Specially Adapted Housing (SAH) Grant Program.
- q. *Government/public buildings, public schools, and public facilities* means any owned and operated facilities by a government entity in accordance with Section 3.48.040 of this Chapter. A new development that is subject to a long-term lease with a government agency for government/public buildings, public schools, and public facilities shall apply only if all of the following conditions are met:
 - i. The new development being constructed is subject to a long-term lease with a government agency.
 - ii. The project shall have a deed restriction placed on the property that limits the use of the government/public facility for the term of the lease, including all extension options, for a period of not less than 20 years. Any change in the use of the facility by the government shall trigger the payment of the TUMF in effect at the time the change is made.
 - iii. No less than ninety percent of the total square footage of the building is leased to the government agency during the term of deed restriction the long term and any extensions thereof.
 - iv. The new development is constructed at prevailing wage rates.

- v. A copy of the lease is provided to the applicable jurisdiction and to WRCOG.
- vi. Based on the facts and circumstances WRCOG determines that the intent of the lease is to provide for long-term government use, and not to evade payment of TUMF.
- r. *Non-profit Organization* means an organization operated exclusively for exempt purposes set forth in section 501(c)(3) of the Internal Revenue Code, and none of its earnings may inure to any private shareholder or individual. In addition, it may not be an action organization, i.e., it may not attempt to influence legislation as a substantial part of its activities, and it may not participate in any campaign activity for or against political candidates. For the purposes of the TUMF Program, the non-profit may be a 501(c)(3) charitable organization as defined by the Internal Revenue Service.
- s. *Long-Term Lease* as used in the TUMF Program, a “long-term lease” shall mean a lease with a term of no less than twenty years.
- t. *Mixed-Use Development* as used in the TUMF Program, means Developments with the following criteria: (1) three or more significant revenue-producing uses, and (2) significant physical and functional integration of project components.
- u. *Guest Dwellings and Detached Second Units* according to the State of California legal definition as following: (1) Complies with the State of California Department of Housing and Community Development *Accessory Dwelling Unit Handbook* and (2) Are ministerially approved by each jurisdiction’s local codes.
- v. *TUMF Administrative Plan* means that the TUMF Administration Plan adopted by the WRCOG Executive Committee on May 5, 2003, as amended, setting forth detailed administration procedures and requirements for the TUMF program.

3.48.030 Establishment of the Transportation Uniform Mitigation Fee.

- a. Adoption of TUMF Schedule. The City Council shall adopt an applicable TUMF schedule by resolution, which may be amended from time to time.
- b. Fee Calculation. The fees shall be calculated by WRCOG according to the calculation methodology fee set forth in the WRCOG TUMF Fee Calculation Handbook adopted July 14, 2003, as amended from time to time. In addition to the data in the Fee Calculation Handbook, WRCOG Staff may consider the following items when establishing the appropriate fee calculation methodology:
 - i. Underlying zoning of the site
 - ii. Land-use classifications in the latest Nexus Study
 - iii. Project specific traffic studies
 - iv. Latest Standardized reference manuals such as the Institute of Traffic Engineers Trip Generation Manual
 - v. Previous TUMF calculations for similar uses
 - vi. WRCOG staff shall approve final draft credit/reimbursement agreement prior to execution
 - vii. WRCOG shall have final determination regarding the appropriate methodology to calculate the fee based on the information provided by the local agency. In case of a conflict between the applicant, WRCOG, and/or the local agency regarding the fee calculation methodology, the

dispute resolution process in the TUMF Administrative Plan will apply.

- c. Fee Adjustment. The fee schedule may be periodically reviewed and adjusted by the WRCOG Executive Committee, and the City Council may amend the applicable fee schedule by resolution. The fees may be increased or decreased to reflect changes in actual or estimated costs of the Regional System, including, but not limited to, debt service, lease payments, and construction costs. Adjustments to the fee schedule may also reflect changes in the transportation facilities required to be constructed, changes in estimated revenues, and the availability or lack of other funding sources for Regional System improvements. The WRCOG shall periodically review the TUMF Program, but no less than every four (4) years, in accordance with the TUMF Administrative Plan.
- d. Credit. Regional System improvements may be credited toward the TUMF in accordance with the TUMF Administrative Plan and the following:

Regional Tier

- i. Arterial Credits: If a developer constructs arterial improvements identified on the Regional System, the developer shall receive credit for all costs associated with the arterial component based on approved Nexus Study for the Regional System effective at the time the credit agreement is entered into. WRCOG staff must pre-approve any credit agreements that deviate from the standard WRCOG approved format.
- ii. Other Credits: In special circumstances, when a developer constructs off-site improvements such as an interchange, bridge, or railroad grade separation, credits shall be determined by WRCOG and the City in consultation with the developer. All such credits must have prior written approval from WRCOG.
- iii. The amount of the development fee credit shall not exceed the maximum amount determined by the Nexus Study for the Regional System at the time the credit agreement is entered into or actual costs, whichever is less.

Local Tier

- i. The local jurisdictions shall compare facilities in local fee programs against the Regional System and eliminate any overlap in its local fee program except where there is a Recognized Financing District has been established.
- ii. If there is a Recognized Financing District established, the local agency may credit that portion of the facility identified in both programs against the TUMF in accordance with the TUMF Administrative Plan.

3.48.040 Exemptions.

The following types of new development shall be exempt from the provisions of this Chapter and in TUMF Administrative Plan:

- (1) Low-income residential housing is described in Section 3.48.020 Definitions, and in the TUMF Administrative Plan.
- (2) Government/public buildings, public schools, and public facilities as described in Section 3.48.020 Definitions and in the TUMF Administrative Plan, and airports that are public use airports and are appropriately permitted by Caltrans or another state agency.

- (3) Development Projects which are the subject of a Public Facilities Development Agreement entered into pursuant to Government Code section 65864 *et seq.*, prior to the effective date of the ordinance imposing the TUMF, where the imposition of new fees are expressly prohibited, provided that if the term of such a Development Agreement is extended by amendment or by any other manner after the effective date of TUMF ordinance, the TUMF shall be imposed.
- (4) The rehabilitation and/or reconstruction of any habitable structure in use on or after January 1, 2000, provided that the same or fewer traffic trips are generated as a result thereof.
- (5) Guest Dwellings and Detached Second Units as described in Section 3.48.020 Definitions, and in the Administrative Plan.
- (6) Kennels and Catteries established in connection with an existing single family residential unit.
- (7) Any sanctuary, or other activity under the same roof of a church or other house of worship that is not revenue generating and is eligible for a property tax exemption (excluding concert venues, coffee/snack shops, bookstores, for-profit pre-school day-cares, etc., which would be assessed TUMF.)
- (8) Any nonprofit corporation or nonprofit organization offering and conducting full-time day school at the elementary, middle school or high school level for students between the ages of five and eighteen years.
- (9) New single-family homes, constructed by non-profit organizations, specially adapted and designed for maximum freedom of movement and independent living for qualified Disabled Veterans.
- (10) Other uses may be exempt as determined by the WRCOG Executive Committee as further defined in the TUMF Administrative Plan.

3.48.050 Annual Construction Cost Index Adjustment.

Beginning July 1, 2026, and annually thereafter, the TUMF shall be automatically adjusted to reflect changes in construction costs.

- a. The annual adjustment shall be calculated by WRCOG based on a blended Construction Cost Index derived from: (1) the National Association of Realtors – Median Sales Price of Existing Single-Family Homes, and (2) the Engineering News-Record (ENR) Construction Cost Index, using the September values of each index from the prior calendar year.
- b. The percentage adjustment applied to the TUMF shall equal the annual percentage change in the blended index; provided, however, that in no event shall the annual adjustment exceed five percent (5%), whether positive or negative.
- c. The calculated adjustment shall be implemented on July 1 of the year following index calculation.
- d. If either referenced index is discontinued or materially altered, WRCOG shall apply a comparable, industry-recognized index that most closely reflects regional transportation construction costs.

3.48.060 Reimbursements.

Should the developer construct Regional System improvements in excess of the TUMF fee obligation, the developer may be reimbursed based on actual costs or the approved Nexus Study effective at the time the agreement was entered into, whichever is less. Reimbursements shall be enacted through an agreement between the developer and the City, contingent on funds being available and approved by WRCOG. In all cases, however, reimbursements under such special agreements must coincide with construction of the transportation improvements as scheduled in the five-year Zone Transportation Improvement Program's adopted annually by WRCOG.

3.48.070 Procedures for Levy, Collection and Disposition of Fees.

- a. Authority. The City Manager, or his/her designee, is hereby authorized to provide WRCOG with development project specifics for the calculation of TUMF in a manner consistent with the TUMF Administrative Plan.
- b. Payment and Collection. Payment of the fees shall be as follows:
 - i. All fees collected hereunder shall be collected by WRCOG for deposit, investment, accounting and expenditure in accordance with the provisions of this Chapter, TUMF Administrative Plan, and the Mitigation Fee Act.
 - ii. The fees shall be paid at the time a certificate of occupancy is issued for the Development Project or upon final inspection, whichever comes first (the "Payment Date"). However, this section should not be construed to prevent payment of the fees prior to issuance of an occupancy permit or final inspection. Fees may be paid at the issuance of a building permit, and the fee payment shall be calculated based on the fee in effect at that time, provided the developer tenders the full amount of his/her TUMF obligation. If the developer makes only a partial payment prior to the Payment Date, the amount of the fee due shall be based on the TUMF fee schedule in place on the Payment Date. The fees shall be calculated according to the fee schedule set forth in the Ordinance and the calculation methodology set forth in the Fee Calculation Handbook adopted July 14, 2003, as amended from time to time.
 - iii. The fees required to be paid shall be the fee amounts in effect at the time of payment is due. The City shall not enter into a development agreement which freezes future adjustments of the TUMF.
 - iv. If all or part of any development project is sold prior to payment of the fee, the property shall continue to be subject to the requirement for payment of the fee. The obligation to pay the fee shall run with the land and be binding on all the successors in interest to the property.
 - v. Fees shall not be waived.
- c. Issuance of Certificate of Occupancy. The City shall not issue a certificate of occupancy for any Development Project until WRCOG has provided written evidence that it has collected the fee.
- d. Appeals. Appeals shall be filed with WRCOG in accordance with the provisions of the TUMF Administrative Plan. Appealable issues shall be the application of the fee, application of credits, application of reimbursement, application of the legal action stay and application of exemption.

- e. Reports to WRCOG. The City Manager, or his/her designee, shall prepare and deliver to the Executive Director of WRCOG, periodic reports as will be established under Section 3.48.080 of this Chapter.

3.48.080 TUMF Administrator.

- a. WRCOG is hereby appointed as the Administrator of the TUMF Program. WRCOG is hereby authorized to collect all fees generated from the TUMF within the City, and to invest, account for and expend such fees in accordance with the provisions of this Chapter and the Mitigation Fee Act. The detailed administrative procedures concerning the implementation of this Chapter shall be contained in the TUMF Administrative Plan. Furthermore, the TUMF Administrator shall use the Fee Calculation Handbook adopted July 14, 2003, as amended from time to time, for the purpose of calculating a developer's TUMF obligation. In addition to detailing the methodology for calculating all TUMF obligations of different categories of new development, the purpose of the Fee Calculation Handbook is to clarify for the TUMF Administrator, where necessary, the definition and calculation methodology for uses not clearly defined in the respective TUMF ordinances.
- b. WRCOG shall expend only that amount of the funds generated by the TUMF for staff support, audit, administrative expenses, and contract services that are necessary and reasonable to carry out its responsibilities and in no case shall the funds expended for salaries and benefits exceed two percent (2%) of the revenue raised by the TUMF Program. The TUMF Administrative Plan further outlines the fiscal responsibilities and limitations of the Administrator.

Section 6. **Clerical Errors.** The City Council directs the City Clerk to correct any clerical errors found in this Ordinance, including, but not limited to, typographical errors, irregular numbering, and incorrect section references.

Section 7. **Severability.** Should any section, subsection, clause, or provision of this Ordinance for any reason be held to be invalid or unconstitutional, such invalidity or unconstitutionality shall not affect the validity or constitutionality of the remaining portions of this Ordinance; it being hereby expressly declared that this Ordinance, and each section, subsection, sentence, clause, and phrase hereof would have been prepared, proposed, approved, and ratified irrespective of the fact that any one or more sections, subsections, sentences, clauses, or phrases be declared invalid, unenforceable, or unconstitutional.

Section 8. **Effective Date.** This Ordinance shall take effect and be in force thirty (30) days from passage and adoption.

Section 9. Publication. The City Clerk shall cause the Ordinance or a summary thereof to be published in accordance with state law.

PASSED, APPROVED, AND ADOPTED this 13th day of May 2026, by the following vote:

AYES:

NOES:

ABSENT:

ABSTAIN:

Jeremy Smith, Mayor

ATTEST & CERTIFIED:

I, Sheryl Garcia, City Clerk of the City of Canyon Lake, hereby attest to the Mayor's signature above and certify that the City Council duly adopted this Ordinance as recorded in the vote tally stated herein.

Sheryl L. Garcia, MMC, CPM
City Clerk

APPROVED AS TO FORM:

Steven Graham Pacifico, City Attorney