


CITY OF MARYSVILLE AGENDA BILL

EXECUTIVE SUMMARY FOR ACTION

CITY COUNCIL MEETING DATE: June 8, 2020

AGENDA ITEM:	
An Ordinance to amend the City of Marysville MMC 22E.020 Floodplain Management regulations as well as Marysville Municipal Code chapters 22A.020 – Definitions	
PREPARED BY:	DIRECTOR APPROVAL:
Cheryl Dungan, Senior Planner	
DEPARTMENT:	
Community Development	
ATTACHMENT:	
Adopting Ordinance (including):	
<ul style="list-style-type: none"> • Exhibit A – Memo to CC dated May 11, 2020 • Exhibit B – DOE Required Changes • Exhibit C – Planning Commission Recommendation • Exhibit D – Adopting Ordinance 	
BUDGET CODE:	AMOUNT:
SUMMARY:	

The city is covered under the *National Floodplain Insurance Program* (NFIP), as a member the City is required to update and adopt revisions to the City’s Floodplain Management Ordinance periodically to ensure compliance with the NFIP. FEMA is in the process, which began in 2007, of updating the *Flood Insurance Rate Maps* (FIRM) and the *Flood Insurance Study for Snohomish County and Incorporated Areas* FIS. It is anticipated that the revised maps and study will be adopted by FEMA, on June 19, 2020. In order for the City of Marysville to continue to qualify for the NFIP, the city is required by both FEMA and DOE to adopt the proposed revisions no later than the June 19, 2020 date.

The proposed changes can be broken down into 3-categories:

- 1) Changes that were outlined in the *Washington State Model Floodplain Ordinance* in order for the City to remain in compliance with the *National Floodplain Insurance Program* (NFIP);
- 2) Other staff recommended changes to bring MMC Chapter 22E.020 *Floodplain Management* up to date with the city review process and to add and/or update language that was considered outdated or obsolete; and
- 3) DOE recommended changes (attachment 3)

The Marysville Planning Commission (PC) completed their review and recommends the City Council approve of the proposed revisions to MMC 22E.020 *Floodplain Management* and MMC 22A.020 *Definitions* to ensure the city remains compliant and continues to qualify for the NFIP.

RECOMMENDED ACTION:
Staff recommends Council adopt the Ordinance amending Marysville Municipal Code chapters 22A.020 – Definitions and 22E.020 – Floodplain Management.
RECOMMENDED MOTION:
I move to adopt the Ordinance presented to amend the Marysville Municipal Code Chapter 22A.020 – Definitions and Chapter 22E.020 –Floodplain Management.



COMMUNITY DEVELOPMENT DEPARTMENT
80 Columbia Avenue ♦ Marysville, WA 98270
(360) 363-8100 ♦ (360) 651-5099 FAX

MEMORANDUM

DATE: May 11, 2020
TO: City Council
FROM: Cheryl Dungan, Senior Planner
RE: Floodplain Protection Code Amendments

Introduction

The city is covered under the NFIP, as a member the City is required to update and adopt revisions to the City's Floodplain Management Ordinance periodically to ensure compliance with the NFIP. FEMA is in the process, which began in 2007, of updating the *Flood Insurance Rate Maps (FIRM)* and the *Flood Insurance Study for Snohomish County and Incorporated Areas FIS*. It is anticipated that the revised maps and study will be adopted by FEMA, no later than June 19, 2020. In order for the City of Marysville to continue to qualify for the NFIP, the city is required by both FEMA and DOE to adopt the proposed revisions.

To help you familiarize yourselves with the City's floodplain areas FIRM maps are attached for your information. The following zones are located in the city's floodplain: Zone A; AE; and X. Zone A contains areas within the 100-year floodplain where base flood elevations have not been determined (primarily Quilceda & Allen Creek). Zone AE are areas within the 100-year floodplain where base flood elevations have been determined (Ebey Slough and Qwuloolt). A designated floodway has also been determined for Ebey Slough and Qwuloolt, but not for Allen or Quilceda Creeks.

Purpose

The purpose of this memo is to provide information regarding the DOE and staff recommended changes to MMC 22E.020 *Floodplain Management*. The proposed changes can be broken down into 2-categories:

- 1) Changes that were outlined in the *Washington State Model Floodplain Ordinance* in order for the City to remain in compliance with the *National Floodplain Insurance Program (NFIP)*; and
- 2) Other staff recommended changes to bring MMC Chapter 22E.020 *Floodplain Management* up to date with the city review process and to add and/or update language that was considered outdated or obsolete.
- 3) Department of Ecology (DOE) recommended changes.

Revisions

A summary of the DOE changes is attached, the summary was specifically developed by DOE to inform the City of Marysville of the revisions necessary for the city to continue to qualify for the NFIP (attachment A).

Other changes include updating language that prohibits new residential construction and/or substantial improvements in the 100-year floodplain; the proposed language change is consistent with the requirement that 100% of the 100-year floodplain be deducted from the gross acreage when net density calculations are calculated for a residential development. The other recommended staff change is to require all variances from the floodplain regulations be heard by the City's Hearing Examiner instead of the City Council. This change is consistent with many other land use actions that are currently heard by the Hearing Examiner.

Recommendation

Staff recommends that City Council approve the Planning Commission's recommendation to approve the proposed changes to Chapter 22E.020 *Floodplain Management*, 22A.020 and incorporate DOE's recommended changes into the code revisions.

From: Radabaugh, David (ECY) <DRAD461@ECY.WA.GOV>
Sent: Monday, April 20, 2020 2:25 PM
To: Cheryl Dungan <CDungan@marysvillewa.gov>
Subject: [External!] RE: PC packet - Floodplain Management

External Email Warning! Use caution before clicking links or opening attachments.

Cheryl,

Thank you for the chance to review the draft ordinance. All and all, I really liked the ordinance. However, I do have a handful of comments:

1. The city should add or update the following definitions:

Elevation Certificate: An administrative tool of the National Flood Insurance Program (NFIP) that can be used to provide elevation information, to determine the proper insurance premium rate, and to support a request for a Letter of Map Amendment (LOMA) or Letter of Map Revision based on fill (LOMR-F).

Reasonably Safe from Flooding: Development that is designed and built to be safe from flooding based on consideration of current flood elevation studies, historical data, high water marks and other reliable data known to the community. In unnumbered A zones where flood elevation information is not available and cannot be obtained by practicable means, reasonably safe from flooding means that the lowest floor is at least two feet above the Highest Adjacent Grade.

2. MMC 22E.020.080 should also include:
 - a. Where development is proposed in a floodway, an engineering analysis indicating no rise of the Base Flood Elevation; and
 - b. Any other such information that may be reasonably required by the Floodplain Administrator in order to review the application.
3. MMC 22E.020.130 should be updated to read:

Subdivision Proposals and Development

All subdivisions, as well as new development shall:

- 1) Be consistent with the need to minimize flood damage;
 - 2) Have public utilities and facilities, such as sewer, gas, electrical, and water systems located and constructed to minimize or eliminate flood damage;
 - 3) Have adequate drainage provided to reduce exposure to flood damage.
 - 4) Where subdivision proposals and other proposed developments contain greater than 50 lots or 5 acres (whichever is the lesser) base flood elevation data shall be included as part of the application.
4. The standard for residential development is very good. However, the residential development standards should be included in the case of a variance approval.

5. What standards apply to the placement of a manufactured home? Is the intent of the code to treat manufactured homes as residential structures? If placement of manufactured homes is allowed in the Special Flood Hazard Area, then at a minimum,
 - 1) All manufactured homes to be placed or substantially improved on sites shall be elevated on a permanent foundation such that the lowest floor of the manufactured home is elevated one foot or more above the base flood elevation and be securely anchored to an adequately anchored foundation system to resist flotation, collapse and lateral movement*.

This applies to manufactured homes:

 - a) Outside of a manufactured home park or subdivision,
 - b) In a new manufactured home park or subdivision,
 - a) In an expansion to an existing manufactured home park or subdivision, or
 - d) In an existing manufactured home park or subdivision on a site which a manufactured home has incurred "substantial damage" as the result of a flood; and
 - 2) Manufactured homes to be placed or substantially improved on sites in an existing manufactured home park or subdivision that are not subject to the above manufactured home provisions be elevated so that either:
 - a) The lowest floor of the manufactured home is elevated one foot or more*
 - b) The manufactured home chassis is supported by reinforced piers or other foundation elements of at least equivalent strength that are no less than 36 inches in height above grade and be securely anchored to an adequately anchored foundation system to resist flotation, collapse, and lateral movement.
6. The ordinance should include:

AE and A1-30 Zones with Base Flood Elevations but No Floodways

In areas with BFEs (when a regulatory floodway has not been designated), no new construction, substantial improvements, or other development (including fill) shall be permitted within zones A1-30 and AE on the community's FIRM, unless it is demonstrated that the cumulative effect of the proposed development, when combined with all other existing and anticipated development, will not increase the water surface elevation of the base flood more than one foot at any point within the community.

Please let me know if there are questions.

David Radabaugh, AICP, CFM
State NFIP Coordinator
Department of Ecology
Northwest Regional Office
3190 - 160th Avenue SE
Bellevue, WA 98008-5452
Office: (425) 649-4260
Cell: (425) 417-3777
david.radabaugh@ecy.wa.gov



COMMUNITY DEVELOPMENT DEPARTMENT
80 Columbia Avenue ♦ Marysville, WA 98270
(360) 363-8100 ♦ (360) 651-5099 FAX

PC Recommendation - Floodplain Management Amendments

The Planning Commission of the City of Marysville, having held a public hearing on March 10, 2020 in review of amendments relating to MMC Chapter 22E.020 *Floodplain Management* and MMC Chapter 22A.020 *Definitions*, related to changes as outlined in the *Washington State Model Floodplain Ordinance* in order for the City to remain in compliance with the *National Floodplain Insurance Program (NFIP)*; and other staff recommended changes to bring MMC Chapter 22E.020 *Floodplain Management* up to date with the city review process, and having considered the exhibits and testimony presented, does hereby enter the following findings, conclusions and recommendation for consideration by Marysville City Council:

FINDINGS:

1. The Planning Commission held a public work session to review amendments relating to MMC Chapter 22E.020 *Floodplain Management* and MMC Chapter 22A.020 *Definitions* on February 11, 2020.
2. A *SEPA Threshold Determination of Non-significance* was issued for the proposed amendments on February 13, 2020 under the *State Environmental Policy Act, WAC 197-11-340(2)*.
3. Community Development Staff submitted the DRAFT amendments relating to MMC Chapter MMC Chapter 22E.020 *Floodplain Management* and MMC Chapter 22A.020 *Definitions* to the State of Washington Department of Commerce for expedited review pursuant to RCW 36.70A.106(3)(b).
4. The Community Development Department received a letter from the State of Washington Department of Commerce acknowledging receipt of the DRAFT amendments and granted expedited review on February 24, 2020 and processed with the material ID #2020-S-1187. No comments were received from State Agencies.
5. The Planning Commission held a duly-advertised public hearing on March 10, 2020.
6. No public comments were received on the DRAFT amendments to MMC Chapter 22E.020 *Floodplain Management* and MMC Chapter 22A.020 *Definitions*.

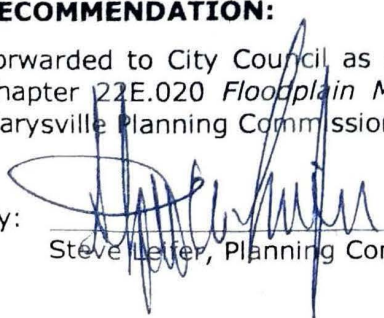
CONCLUSION:

At the public hearing, the Planning Commission recommended adoption of the amendments relating to MMC Chapter MMC Chapter 22E.020 *Floodplain Management*, attached hereto as **Exhibit A**, and MMC Chapter 22A.020 *Definitions*, attached hereto as **Exhibit B**, as reflected in the Planning Commission Minutes, dated March 10, 2020, attached hereto as **Exhibit C**.

RECOMMENDATION:

Forwarded to City Council, as a Recommendation of Approval of the amendments to MMC Chapter 22E.020 *Floodplain Management* and MMC Chapter 22A.020 *Definitions*, by the Marysville Planning Commission this 10th day of March, 2020.

By:


Steve Helder, Planning Commission Chair

CITY OF MARYSVILLE
Marysville, Washington

ORDINANCE NO. _____

AN ORDINANCE OF THE CITY OF MARYSVILLE, WASHINGTON, REPEALING MARYSVILLE MUNICIPAL CODE CHAPTER 22E.020 FLOODPLAIN MANAGEMENT AMENDING MARYSVILLE MUNICIPAL CODE TITLE 22 UNIFIED DEVELOPMENT CODE, ADOPTING A NEW FLOODPLAIN MANAGEMENT CHAPTER 22E.020 AND AMENDING DEFINITIONS IN MARYSVILLE MUNICIPAL CODE SECTIONS 22A.020.020, 22A.020.030, 22A.020.060, 22A.020.070, 22A.020.090, 22A.020.130, 22A.020.140, 22A.020.190, AND 22A.020.200.

WHEREAS, the State Growth Management Act, Chapter 36.70A RCW mandates that cities periodically review and amend development regulations, including zoning ordinances and official controls; and

WHEREAS, RCW 36.70A.106 requires the processing of amendments to the City's development regulations in the same manner as the original adoption of the City's comprehensive plan and development regulations; and

WHEREAS, the State Growth Management Act requires notice and broad public participation when adopting or amending the City's comprehensive plan and development regulations; and

WHEREAS, the City, in reviewing and amending its development regulations has complied with the notice, public participation, and processing requirements established by the Growth Management Act, as more fully described below; and

WHEREAS, the City Council of the City of Marysville finds that from time to time it is necessary and appropriate to review and revise provisions of the City's municipal code and development code (MMC Title 22); and

WHEREAS, during a public meeting on February 11, 2020, the Planning Commission discussed changes to Marysville Municipal Code Chapter 22E.020 floodplain management amending Marysville Municipal Code Title 22 Unified Development Code, adopting a new Floodplain Management Chapter 22E.020 and amending definitions in Marysville Municipal Code Sections 22A.020.020, 22A.020.030, 22A.020.060, 22A.020.070, 22A.020.090, 22A.020.130, 22A.020.140, 22.020.190, and 22A.020.200; and

WHEREAS, the City of Marysville submitted the proposed development regulation revisions to the Washington State Department of Commerce as required by RCW 36.70A.106. The proposed development regulation revisions were received by the Washington State Department of Commerce on February 10, 2020, and processed with the Material the material ID #2020-S-1187. No comments were received from State agencies; and

WHEREAS, a *SEPA Threshold Determination* was issued for the proposed amendments on February 13, 2020 under the *State Environmental Policy Act* under WAC 197-11-340(20) and there were no appeals;

WHEREAS, after providing notice to the public as required by law, the Marysville Planning Commission held a Public Hearing on March 10, 2020 regarding the proposed amendments to MMC Sections 22C.010.060, 22C.020.060, and 22C.240.030; and

WHEREAS, on March 10, 2020 the Planning Commission made a *Recommendation* to the City Council recommending the adoption of the proposed amendments to repeal Marysville Municipal Code Chapter 22E.020 floodplain management repeal of Marysville Municipal Code Title 22 Unified Development Code, adopting a new Floodplain Management Chapter 22E.020 and amending definitions in Marysville Municipal Code Sections 22A.020.020, 22A.020.030, 22A.020.060, 22A.020.070, 22A.020.090, 22A.020.130, 22A.020.140, 22.020.190, and 22A.020.200; and

WHEREAS, the City received written confirmation from the Department of Ecology (the "Department") that the City's proposed changes to the Floodplain Management Code is consistent with required changes as outlined in the *Washington State Model Floodplain Ordinance* and to qualify for the *National Insurance Flood Program* subject to the Department's Finding and Conclusions and the Department's Required Changes, which Required Changes are attached hereto as **Exhibit B**; and

WHEREAS, at a public meeting on June 8, 2020 the Marysville City Council reviewed and considered the Planning Commission's Recommendation and the proposed amendments to Marysville Municipal Code Chapter 22E.020 floodplain management, repealing and adopting a new Floodplain Management Chapter 22E.020 and amending definitions in Marysville Municipal Code Sections 22A.020.020, 22A.020.030, 22A.020.060, 22A.020.070, 22A.020.090, 22A.020.130, 22A.020.140, 22.020.190, and 22A.020.200.

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF MARYSVILLE, WASHINGTON. DO ORDAIN AS FOLLOWS:

Section 1. Chapter 22E.020 MMC, Floodplain Management, is hereby repealed, in its entirety.

Section 1. Chapter 22E.020 MMC, Floodplain Management, is hereby repealed, in its entirety.

Section 2. A new MMC Title 22E.010, Unified Development Code (UDC), is hereby adopted to read as set out in **Exhibit A**, attached hereto and incorporated herein by this reference, subject to the Department's required changes, which are attached in **Exhibit B**.

Section 3. 22A.020.020 "A" definitions.

Alteration of Watercourse (floodplain management)" means any action that will change the location of the channel occupied by water within the banks of any portion of a riverine waterbody.

"Area of shallow flooding (floodplain management)" means a designated AO or AH zone on the flood insurance rate map (FIRM) with a one percent or greater annual chance of flooding. The base flood depths range from one to three feet; a clearly defined channel does not exist; the path of flooding is unpredictable and indeterminate; and velocity flow may be evident. AO is characterized as sheet flow and AH indicates ponding.

"Area of special flood hazard (floodplain management)" means the land in the floodplain within a community subject to a one percent or greater chance of flooding in any given year. It is shown on the Flood Insurance Rate Map (FIRM) as zone A, AO, AH, A1-30, AE, A99, AR (V, VO, V1-30, VE). "Special flood hazard area" is synonymous in meaning with the phrase "area of special flood hazard".

Section 4. 22A.020.030 "B" definitions.

"Base Flood Elevation or BFE (floodplain management)" means the elevation to which floodwater is anticipated to rise during the base flood.

Section 5. 22A.020.060 "E" definitions.

Elevation Certificate means an administrative tool of the National Flood Insurance Program (NFIP) that can be used to provide elevation information, to determine the proper insurance premium rate, and to support a request for a Letter of Map Amendment (LOMA) or Letter of Map Revision based on fill (LOMR-F).

Section 6. 22A.020.070 "F" definitions.

"Flood or Flooding (floodplain management)" means:

(1) A general and temporary condition of partial or complete inundation of normally dry land areas from:

(a) The overflow of inland or tidal waters.

(b) The unusual and rapid accumulation or runoff of surface waters from any source.

(c) Mudslides (i.e., mudflows) which are proximately caused by flooding as defined in paragraph (1)(b) of this definition and are akin to a river of liquid and flowing mud on the surfaces of normally dry land areas, as when earth is carried by a current of water and deposited along the path of the current.

(2) The collapse or subsidence of land along the shore of a lake or other body of water as a result of erosion or undermining caused by waves or currents of water exceeding anticipated cyclical levels or suddenly caused by an unusually high water level in a natural body of water, accompanied by a severe storm, or by an unanticipated force of nature, such as flash flood or an abnormal tidal surge, or by some similarly unusual and unforeseeable event which results in flooding as defined in paragraph (1)(a) of this definition.

"Flood Elevation Study (floodplain management)" means an examination, evaluation and determination of flood hazards and, if appropriate, corresponding water surface elevations, or an examination, evaluation and determination of mudslide (i.e., mudflow) and/or flood-related erosion hazards. Also known as a Flood Insurance Study (FIS).

"Flood Insurance Rate Map or FIRM (floodplain management)" means the official map of a community, on which the Federal Insurance Administrator has delineated both the special hazard areas and the risk premium zones applicable to the community. A FIRM that has been made available digitally is called a Digital Flood Insurance Rate Map (DFIRM).

"Floodplain or Flood Prone Area (floodplain management)" means any land area susceptible to being inundated by water from any source. See "Flood or flooding."

"Floodplain Administrator (floodplain management)" means the community official designated by title to administer and enforce the floodplain management regulations.

"Flood Proofing (floodplain management)" means any combination of structural and nonstructural additions, changes, or adjustments to structures which reduce or eliminate risk of flood damage to real estate or improved real property, water and sanitary facilities, structures, and their contents. Flood proofed structures are those that

have the structural integrity and design to be impervious to floodwater below the Base Flood Elevation.

“Floodway (floodplain management)” means the channel of a river or other watercourse and the adjacent land areas that must be reserved in order to discharge the base flood without cumulatively increasing the water surface elevation more than one foot. Also referred to as “Regulatory Floodway.”

“Functionally Dependent Use (floodplain management)” means a use which cannot perform its intended purpose unless it is located or carried out in close proximity to water. The term includes only docking facilities, port facilities that are necessary for the loading and unloading of cargo or passengers, and ship building and ship repair facilities, and does not include long term storage or related manufacturing facilities.

Section 7. 22A.020.090 “H” definitions.

“Highest Adjacent Grade (floodplain management)” means the highest natural elevation of the ground surface prior to construction next to the proposed walls of a structure.

“Historic Structure (floodplain management)” means any structure that is: Listed individually in the National Register of Historic Places (a listing maintained by the Department of Interior) or preliminarily determined by the Secretary of the Interior as meeting the requirements for individual listing on the National Register;

(1) Certified or preliminarily determined by the Secretary of the Interior as contributing to the historical significance of a registered historic district or a district preliminarily determined by the Secretary to qualify as a registered historic district;

(2) Individually listed on a state inventory of historic places in states with historic preservation programs which have been approved by the Secretary of Interior; or

(3) Individually listed on a local inventory of historic places in communities with historic preservation programs that have been certified either:

(a) By an approved state program as determined by the Secretary of the Interior,

or

(b) Directly by the Secretary of the Interior in states without approved programs.

Section 8. 22A.020.130 “L” definitions.

“Lowest floor (floodplain management)” means the lowest floor of the lowest enclosed area (including basement). An unfinished or flood-resistant enclosure, used solely for parking of vehicles, building access, or storage in an area other than a basement area, is not considered a building’s lowest floor, provided that such enclosure is not built so as to render the structure in violation of the applicable non-elevation design requirements of this code (i.e. provided there are adequate flood ventilation openings).

Section 9. 22A.020.140 “M” definitions.

“Mean Sea Level (floodplain management)” means for purposes of the National Flood Insurance Program, the vertical datum to which Base Flood Elevations shown on a community's Flood Insurance Rate Map are referenced.

Section 10. 22A.020.190 "R" definitions.

"Reasonably safe from flooding" means development that is designed and built to be safe from flooding based on consideration of current flood elevation studies, historical data, high water marks and other reliable data known to the community. In unnumbered A zones where flood elevation information is not available and cannot be obtained by practicable means, reasonably safe from flooding means that the lowest floor is as least two feet above the Highest Adjacent Grade.

- a. Where development is proposed in a floodway, an engineering analysis indicating no rise of the Base Flood Elevation; and
- b. Any other such information that may be reasonably required by the Floodplain Administrator in order to review the application.

Section 11. 22A.020.200 "S" definitions.

"Structure (floodplain management)" means a walled and roofed building, including a gas or liquid storage tank, that is principally above ground, as well as a manufactured home.

"Substantial improvement (floodplain management)" means any reconstruction, rehabilitation, addition, or other improvement of a structure, the cost of which equals or exceeds 50 percent of the market value of the structure before the "start of construction" of the improvement. This term includes structures which have incurred "substantial damage," regardless of the actual repair work performed. The term does not, however, include either:

- (1) Any project for improvement of a structure to correct previously identified existing violations of state or local health, sanitary, or safety code specifications that have been identified by the local code enforcement official and that are the minimum necessary to assure safe living conditions; or
- "historic structure," provided that the alteration will not preclude the structure's continued designation as a "historic structure." (2)

Section 12. 22A.020.230 "V" definitions.

"Variance (floodplain management)" means a grant of relief by a community from the terms of a floodplain management regulation.

Section 13. MMC 22A.010.160 is hereby amended to add the following reference to this adopted ordinance in order to track amendments to the City's Unified Development Code:

"22A.010.160 Amendments.

The following amendments have been made to the UDC subsequent to its adoption:

<u>Ordinance</u>	<u>Title (description)</u>	<u>Effective Date</u>
_____	Floodplain Management and Definition Amendments	_____, 2020"

Section 10. Severability. If any section, subsection, sentence, clause, phrase or word of this ordinance should be held to be invalid or unconstitutional by a court of

competent jurisdiction, such invalidity or unconstitutionality thereof shall not affect the validity or constitutionality of any other section, subsection, sentence, clause, phrase or word of this ordinance.

Section 11. Corrections. Upon approval by the city attorney, the city clerk or the code reviser are authorized to make necessary corrections to this ordinance, including scrivener's errors or clerical mistakes; references to other local, state, or federal laws, rules, or regulations; or numbering or referencing of ordinances or their sections and subsections

Section 12. Effective Date. Pursuant to RCW 90.58.090(7), this ordinance shall be effective fourteen (14) days from the date of the Department of Ecology's Written Notice of Final Action to the City.

PASSED by the City Council and APPROVED by the Mayor this _____ day of June, 2020.

CITY OF MARYSVILLE

By: _____
JON NEHRING, MAYOR

Attest:

By: _____
TINA BROCK, DEPUTY CITY CLERK

Approved as to form:

By: _____
JON WALKER, CITY ATTORNEY

Date of Publication: _____

Effective Date: _____