



City of Yuma City Council Meeting Special Council Meeting Agenda

Monday, October 6, 2025

11:00 AM

Yuma City Hall Council Chambers
One City Plaza, Yuma

Notice is hereby given, pursuant to Resolution R2015-047 that one or more members of the Yuma City Council may participate in person or by telephonic, video or internet conferencing. Voting procedures will remain as required by the Yuma City Charter and other applicable laws.

Those wishing to speak on an agenda item must complete a Speaker Request Form prior to the start of the meeting. Speaker Request Forms can be found on the City's website, in the Clerk's Office, as well as in the Council Chambers.

Speaker Request Forms should be submitted to City Clerk staff prior to the start of each meeting. All speakers are provided 3 minutes, with no more than 5 speakers permitted per topic/issue.

City Council Worksessions and Regular City Council Meetings can be viewed through the following platforms:

- Cable – Meetings are broadcast live on Spectrum Cable Channel 73.
- Live Stream – Residents can watch meetings on their computer or mobile device at www.yumaaz.gov/telvue. Previous Council meetings are also available on-demand.
- Virtual – Residents can watch meetings via Teams on their computer or mobile device at www.yumaaz.gov/publicmeetings. Click on "Calendar" then select the City meeting and click "Join".

CALL TO ORDER

ROLL CALL

I. RESOLUTION OPPOSING THE TRANSFER OF COLORADO RIVER WATER**1. [R2025-095](#)**

Resolution Opposing the Permanent Transfer of Colorado River Water from Greenstone RP, d/b/a “GSC Farms, LLC”, to the Town of Queen Creek, Arizona, as presented, and offering reasonable alternatives. (City Administration/City Attorney)(Jay Simonton/Rodney Short)

Adopt a Resolution Opposing the Permanent Transfer of Colorado River Water from the Greenstone RP, d/b/a GSC Farms, LLC, to the Town of Queen Creek, Arizona. The proposed transfer seeks to permanently move 2,033.01 acre-feet per year (AFY) of 4th Priority Colorado River water off River to the Town of Queen Creek in Pinal and Maricopa Counties (Permanent Transfer). The Resolution urges the Secretary of the Interior and the Bureau of Reclamation to fully comply with all federal environmental laws and the preparation of an Environmental Impact Statement (EIS) in connection with the Permanent Transfer and in compiling the EIS, to consider the significant and harmful impacts, both socioeconomic and environmental, of a Permanent Transfer of water off the Colorado River, especially at a time when it is universally recognized the Colorado River is over-allocated and in crisis, and all users are being advised to conserve.

The Resolution urges the U.S. Bureau of Reclamation to consider a No Action Alternative pursuant to the National Environmental Policy Act (NEPA), or alternatively, limit any transfers of Colorado River water to non-shortage times when the Colorado River levels at Lake Powell and Lake Mead can meet the current commitments of water entitlement holders. The Resolution directs the City Administrator to provide comments on behalf of the City of Yuma and the Mayor and City Council. The Resolution also directs the Yuma City Clerk to provide a copy of the Resolution, as adopted, to the Mayor and Town Council of the Town of Queen Creek, Arizona, the City of Yuma's Federal and State Legislators, the Governor of Arizona, the Commissioner of the Bureau of Reclamation, the Director of the Arizona Department of Water Resources, the Statutory Agent of GSC Farm, LLC., and the Council on Environmental Quality within the Executive Office of the President.

Attachments:

[1. RES Resolution Opposing Greenstone Transfer](#)

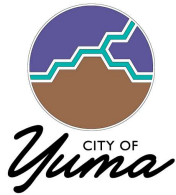
II. EXECUTIVE SESSION

An Executive Session may be called during the public meeting for the purpose of receiving legal advice for items on this agenda pursuant to A.R.S. Section 38-431.03 A (1, 3, 4 and/or 7) and the following items:

There are no additional Executive Session items scheduled at this time

ADJOURNMENT

In accordance with the Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act of 1973, the City of Yuma does not discriminate on the basis of disability in the admission of or access to, or treatment or employment in, its programs, activities, or services. For information regarding rights and provisions of the ADA or Section 504, or to request reasonable accommodations for participation in City programs, activities, or services contact: ADA/Section 504 Coordinator, City of Yuma Human Resources Department, One City Plaza, Yuma, AZ 85364-1436; (928) 373-5125 or TTY (928) 373-5149.



City of Yuma

City Council Report

File #: R2025-095

Agenda Date: 10/6/2025

Agenda #: 1.

DEPARTMENT: City Administration	STRATEGIC OUTCOMES	ACTION
DIVISION: Administration	<input type="checkbox"/> Safe & Prosperous <input type="checkbox"/> Active & Appealing <input checked="" type="checkbox"/> Respected & Responsible <input type="checkbox"/> Connected & Engaged <input type="checkbox"/> Unique & Creative	<input type="checkbox"/> Motion <input checked="" type="checkbox"/> Resolution <input type="checkbox"/> Ordinance - Introduction <input type="checkbox"/> Ordinance - Adoption <input type="checkbox"/> Public Hearing

TITLE:

Resolution Opposing the Permanent Transfer of Colorado River Water from Greenstone RP, d/b/a "GSC Farms, LLC", to the Town of Queen Creek, Arizona, as presented, and offering reasonable alternatives. (City Administration/City Attorney)(Jay Simonton/ Rodney Short)

SUMMARY RECOMMENDATION:

Adopt a Resolution Opposing the Permanent Transfer of Colorado River Water from the Greenstone RP, d/b/a GSC Farms, LLC, to the Town of Queen Creek, Arizona. The proposed transfer seeks to permanently move 2,033.01 acre-feet per year (AFY) of 4th Priority Colorado River water off River to the Town of Queen Creek in Pinal and Maricopa Counties (Permanent Transfer). The Resolution urges the Secretary of the Interior and the Bureau of Reclamation to fully comply with all federal environmental laws and the preparation of an Environmental Impact Statement (EIS) in connection with the Permanent Transfer and in compiling the EIS, to consider the significant and harmful impacts, both socioeconomic and environmental, of a Permanent Transfer of water off the Colorado River, especially at a time when it is universally recognized the Colorado River is over-allocated and in crisis, and all users are being advised to conserve.

The Resolution urges the U.S. Bureau of Reclamation to consider a No Action Alternative pursuant to the National Environmental Policy Act (NEPA), or alternatively, limit any transfers of Colorado River water to non-shortage times when the Colorado River levels at Lake Powell and Lake Mead can meet the current commitments of water entitlement holders. The Resolution directs the City Administrator to provide comments on behalf of the City of Yuma and the Mayor and City Council. The Resolution also directs the Yuma City Clerk to provide a copy of the Resolution, as adopted, to the Mayor and Town Council of the Town of Queen Creek, Arizona, the City of Yuma's Federal and State Legislators, the Governor of Arizona, the Commissioner of the Bureau of Reclamation, the Director of the Arizona Department of Water Resources, the Statutory Agent of GSC Farm, LLC., and the Council on Environmental Quality within the Executive Office of the President.

STRATEGIC OUTCOME:

Approving this resolution opposing the off-River transfer furthers the City Council's strategic outcome of Respected and Responsible as the deleterious impacts of the off-River transfer affect not only the human environment of rural River communities like Yuma but also compound the impact by further jeopardizing production of hydroelectric power.

REPORT:

On September 15, 2025, the U.S. Department of Interior, Bureau of Reclamation (Reclamation) published a Notice of Intent To Prepare an Environmental Impact Statement (EIS) for the GSC Farms, LLC (Greenstone) - Queen Creek Water Transfer Project. The Federal Register Notice of Intent can be found at this website: <https://www.govinfo.gov/content/pkg/FR-2025-09-15/pdf/2025-17743.pdf>. This Notice of Intent continues an application to the Arizona Department of Water Resources (ADWR) filed by Greenstone in 2019. Under the proposed water transfer, Greenstone would sell a water supply to the Town of Queen Creek to be used in the Town's water service area in Pinal and Maricopa Counties. It should be noted that this would be the first ever transfer of Colorado River from an on-River entitlement holder to metropolitan central Arizona that was not allocated through the Central Arizona Conservation District, known as the Central Arizona Project (CAP).

That 2019 request was denied by ADWR. However on reconsideration, and despite overwhelming opposition from Colorado River Communities to the Permanent Transfer and the substantial evidence in the record of the devastating and deleterious impacts of the Permanent Transfer, the ADWR initially recommended to Reclamation that they approve the transfer of 1,078.01 AFY of Greenstone's 2,083.1 AFY 4th Priority Colorado River entitlement, and that Greenstone retain 1,005 AFY of 4th Priority Colorado River entitlement for future use on the 500 acres of land owned by Greenstone in La Paz County. Later, ADWR increased the recommendation to 2,033.01 AFY, leaving an insignificant amount of water for use on the 500 acres in La Paz County.

Despite strong public comments urging Reclamation to engage in a full EIS, Reclamation determined that a less-intensive Environmental Assessment (EA) was all that was necessary to evaluate the Permanent Transfer. Reclamation opined that the Permanent Transfer "does not constitute a major federal action significantly affecting the quality of the human environment, and, therefore, an [EIS] is not required." The Reclamation's opinion was devoid of any real analysis on why Reclamation elected not to follow the full EIS as set forth in NEPA.

The 2,033.01 acre-feet of water in Greenstone's Permanent Transfer proposal is part of the Fourth Priority Colorado River Water that has been reserved by Arizona through the Arizona Water Commission in the 1970's as part of a 164,652 acre-feet (9.89% of Arizona's Fourth Priority Colorado River entitlement) set-aside for the use of on-river, Arizona Colorado River Communities and entitlements. More recently, the State of Arizona, through ADWR, reaffirmed its commitment to the set-aside water (including the water in Greenstone's Permanent Transfer proposal) for the benefit of Arizona's Colorado River communities when ADWR stated, "it is the Department's unequivocal position that this water is to be reserved for future M&I use along the River. It is not to be considered as supplies available for any other purpose." (M&I refers to municipal and industrial use). The ADWR position letter further states, "[t]he increased quantity being recommended [for allocation] is part of the 164,652 recognized in the CAP Master Repayment Contract as being available for contracting along the River." (See the February 28, 1990 ADWR Letter to the Bureau of Reclamation, page 2 of 5 and page 4 of 5 respectively).

The EA process moved quickly. In August 2021, Reclamation initiated scoping and public comment for its EA on the Permanent Transfer. Reclamation published its final EA in July 2022. Despite a multitude of public comments showing the detrimental impacts of this Permanent Transfer and the precedential decision to allow future Colorado River transfers, Reclamation's EA determined that the impacts were not significant and published an official Finding of No Significant Impact (FONSI) in August 2022, which would permit the Permanent Transfer to begin in 2023.

In December 2022, the Yuma City Council authorized joining Mohave County, La Paz County and later, Yuma County, in a lawsuit against Reclamation. See City Council Motion 2022-228 (December 21, 2022). The lawsuit sought a preliminary injunction against the Permanent Transfer and remand the matter back to

Reclamation to conduct a full EIS on the Permanent Transfer as mandated by NEPA. Litigation ensued and the Counties and the City were denied the preliminary injunction in April 2023. The private transaction for the Permanent Transfer between Greenstone and Queen Creek closed on May 8, 2023, for a purported \$20,000,000 and Colorado River water under the Permanent Transfer began to divert at the Wilmer Plant in Lake Havasu and flow through the CAP canal system to Queen Creek in June 2023.

The litigation continued and in February 2024, the on-River communities of Mohave County, La Paz County, Yuma County, and the City of Yuma prevailed on Summary Judgment with the Federal Court finding that there were questions of significant impact that needed to be addressed through a full EIS. The matter was remanded back to Reclamation to address the shortcomings, presumably through a full EIS to satisfy the requirements of NEPA. In the interim, the Federal Court left in place the FONSI and the four water contracts between Greenstone and Queen Creek and the CAP.

This brings the calendar to September 15, 2025, when Reclamation publishes the Notice of Intent to prepare a full EIS for the Permanent Transfer. Reclamation has a target date for completion of the EIS and issuance of a Record of Decision (ROD) in April 2027.

Should Greenstone's Permanent Transfer be approved, the 4th Priority Colorado River Water entitlement transfer will establish a new and ominous precedent for the diversion of the reserved water away from Arizona's Colorado River Communities, a significant loss to future generations of farmers and the River Communities.

The City of Yuma and many of the Colorado River water users depend on the Colorado River Water entitlements and carefully plan, conserve, and prioritize use of water. The Yuma City Council, the City of Yuma, and other Colorado River water users have consistently opposed efforts to transfer Colorado River water away from On-River users for use in other parts of the State. Attempts to transfer water away from Arizona's Colorado River Communities seriously threaten the future economic well-being of the affected River Communities and deprive them of future growth opportunities in favor of remote interests in other parts of the State. Even worse, allowing such transfers creates a frightening new economic reality for water users in the Arizona desert: access to water will go to the highest bidder. Sound water policy should benefit all Arizona residents, not just the highest bidder. Lastly, the proposed transfer will result in less water being available for return flows to the Colorado River, which given the region is in a 21-year drought, is not the water policy Arizona should be pursuing.

Reclamation brings this Notice of Intent as several key agreements governing the Colorado River's management, including the 2007 Interim Guidelines and the 2019 Drought Contingency Plans, are set to expire at the end of 2026. Currently, the seven states with Colorado River water rights are in negotiations for the Federal Post 2026 Operational Guidelines that necessitate a comprehensive review and development of new operational guidelines to ensure the River's sustainability for future generations. The seven states have yet to come to a consensus and negotiation attempts have been unproductive. The Colorado River is overallocated and the levels at Lake Powell and Lake Mead have fallen to crisis elevations not only for a stable water supply, but for the ability to generate hydroelectric power, creating another calamity.

Agricultural to urban transfers might appear to be a viable solution to a community's water needs, but in reality, these transfers worsen water shortages, deepen the Colorado River's structural deficit, and permanently weaken economies. Arizona's future requires policies that conserve water where it is, protect the communities that depend on it, and recognize the true limits of the Colorado River System. Arizona needs new water sources and sustainable strategies, not the dismantling of the agricultural base that keeps both rural communities and our food supply alive.

As a result, the Resolution under consideration is intended to signal the City of Yuma's continued opposition to the Greenstone Permanent Transfer as presented. Reclamation is urged to consider a No Action Alternative

given impacts of this Permanent Transfer under the current conditions. Alternatively, Reclamation must implement a sound policy and precedent that limits this Permanent Transfer, and any similar proposed transfers of Colorado River water, to times when the Colorado River levels at Lake Powell and Lake Mead rise to a safe elevation to mitigate the environmental impacts and the hydroelectric concerns.

FISCAL REQUIREMENTS:

CITY FUNDS:	\$ 0.00	BUDGETED:	\$ 0.00
STATE FUNDS:	\$ 0.00	AVAILABLE TO TRANSFER:	\$ 0.00
FEDERAL FUNDS:	\$ 0.00	IN CONTINGENCY:	\$ 0.00
OTHER SOURCES:	\$ 0.00	FUNDING ACCOUNT/FUND #/CIP:	
TOTAL	\$ 0.00	-	

FISCAL IMPACT STATEMENT:

NONE

ADDITIONAL INFORMATION:

SUPPORTING DOCUMENTS NOT ATTACHED TO THE CITY COUNCIL ACTION FORM THAT ARE ON FILE IN THE OFFICE OF THE CITY CLERK:

NONE

IF CITY COUNCIL ACTION INCLUDES A CONTRACT, LEASE OR AGREEMENT, WHO WILL BE RESPONSIBLE FOR ROUTING THE DOCUMENT FOR SIGNATURE AFTER CITY COUNCIL APPROVAL?

- ☐ Department
- ☒ City Clerk's Office
- ☐ Document to be recorded
- ☐ Document to be codified

Acting City Administrator: John D. Simonton	Date: 10/03/2025
Reviewed by City Attorney: Richard W. Files	Date: 10/03/2025

RESOLUTION NO. R2025-095

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF YUMA, ARIZONA, OPPOSING THE PERMANENT TRANSFER OF COLORADO RIVER WATER FROM GREENSTONE RP, DBA, "GSC FARMS, LLC" TO THE TOWN OF QUEEN CREEK, ARIZONA

WHEREAS, the City Council of the City of Yuma met in Regular Session on the 20th day of November 2019 and unanimously approved Resolution R2019-051 Opposing the Transfer of Colorado River Water from La Paz County to the Town of Queen Creek (Permanent Transfer); and,

WHEREAS, on September 4, 2020, despite overwhelming opposition from Colorado River Communities to the Permanent Transfer and substantial evidence in the record of the devastating and deleterious impacts of the Permanent Transfer, the Arizona Department of Water Resources (ADWR) recommended that the United States Bureau of Reclamation (Reclamation) approve the transfer of 1,078.01 acre-feet per year (AFY) of Greenstone RP's, d/b/a "GSC Farms, LLC" (Greenstone) 2,083.01 AFY fourth priority Colorado River entitlement, and that Greenstone retain 1,005 AFY of fourth priority Colorado River entitlement for future use on the 500 acre parcel of land owned by Greenstone in La Paz County; and,

WHEREAS, ADWR later increased the Permanent Transfer recommendation to 2,033.01 AFY, leaving an insignificant amount of water for use on the 500-acre parcel; and,

WHEREAS, this recommendation by ADWR reverses a long held policy reflected in a letter dated February 28, 1990, from then-ADWR Director Plummer to the Secretary of the Interior regarding Colorado River allocations in Arizona (1990 Letter), as well as an internal Reclamation memo in 1988 regarding a contract with the Central Arizona Water Conservation District (1988 Memo) affirming that 164,652 AFY of fourth priority water of which Greenstone's entitlement is a part, is reserved for use on the mainstem of the Colorado River (communities and users located adjacent to the Colorado River) for agricultural, municipal and industrial uses; and,

WHEREAS, ADWR's reversal of the long-held policy established by the 1990 Letter and 1988 Memo undermines decades of water resource planning by Colorado River Communities and creates a dangerous precedent that could irrevocably disrupt the necessary and needed critical water supply Colorado River communities so heavily rely upon to serve their communities; and,

WHEREAS, the City Council of the City of Yuma met in Regular Session on 7th day of October 2020 and unanimously approved Resolution R2020-046, again Opposing the Permanent Transfer and urging Reclamation to fully comply with all federal environmental laws and the preparation of an Environmental Impact Statement (EIS) in connection with the Permanent Transfer; and,

WHEREAS, despite strong public comments urging Reclamation to engage in a full EIS, Reclamation determined that a less-intensive Environmental Assessment (EA) was all that was necessary to evaluate the Permanent Transfer; and,

WHEREAS, Reclamation opined that the Permanent Transfer “does not constitute a major federal action significantly affecting the quality of the human environment, and, therefore, an [EIS] is not required” without any further analysis on why Reclamation elected not to follow the full EIS as set forth in the federal National Environmental Policy Act (NEPA); and,

WHEREAS, despite a multitude of public comments showing the detrimental impacts of this Permanent Transfer and the precedential decision to allow future Colorado River transfers, Reclamation’s EA determined that the impacts were not significant and published an official Finding of No Significant Impact (FONSI) in August 2022, which would permit the Permanent Transfer to begin in 2023; and,

WHEREAS, the City Council of the City of Yuma met in Regular Session on the 22th day of December, 2022, and unanimously moved to approve Motion MC2022-228 Authorizing Legal Action versus United States Department of Interior, Bureau of Reclamation, seeking a preliminary injunction against the Permanent Transfer and remand back to Reclamation to conduct a full EIS on the Permanent Transfer as mandated by NEPA; and,

WHEREAS, after lengthy litigation in a matter styled as County of Mohave, County of La Paz, County of Yuma, and City of Yuma versus U.S. Bureau of Reclamation, et al., in the U.S. District Court for the District of Arizona, Case No. CV-22-08246-PCT-MTL, the Plaintiffs of the On-River Counties and City of Yuma prevailed on Summary Judgment with the Federal Court finding there were substantial questions that Permanent Transfer may have a significant effect on the environment and under NEPA, Reclamation must conduct an EIS; and,

WHEREAS, on September 15, 2025, Reclamation published a “Notice of Intent To Prepare an Environmental Impact Statement for the GSC Farm-Queen Creek Water Transfer Project” with comments due on or before close of business on October 15, 2025; and,

WHEREAS, water is one of Yuma’s most precious natural resources that is in jeopardy of being depleted if not managed adequately; and,

WHEREAS, water is necessary, essential and finite for the continued growth and economic survival of On-River communities; and,

WHEREAS, should Greenstone’s Permanent Transfer be approved, the 4th Priority Colorado River Water entitlement transfer will establish a new and ominous precedent for the diversion of the reserved water away from Arizona’s Colorado River Communities, a significant loss to future generations of farmers and the River Communities; and,

WHEREAS, this Permanent Transfer and future transfers of water entitlements from the main stem of the Colorado River to other basins could have adverse impacts on the environment including negative impacts on endangered species habitat in the five national wildlife refuges in the lower Colorado River Valley; and,

WHEREAS, this Permanent Transfer and future transfers of water entitlements from the main stem of the Colorado River to other basins could have adverse impacts on the human environment including the generation of hydroelectric power utilized by the region including City of Yuma through the Western Area Power Administration (WAPA), resulting in increased electricity charges for users in the region.

NOW THEREFORE, BE IT RESOLVED by the City Council of the City of Yuma as follows:

SECTION 1: The City Council of the City of Yuma opposes any transfer of Colorado River water from the mainstem of the Colorado River to central Arizona without significant safeguards and considers such transfers as an unwelcome attack on the water rights and continued economic growth and viability of rural Arizona.

SECTION 2: The City Council of the City of Yuma asserts that approval by the Secretary of the Interior of this Permanent Transfer request is a major federal action which requires the Bureau of Reclamation to fully comply with public processes of the National Environmental Policy Act of 1969 (NEPA) and the Endangered Species Act of 1973, and such action requires the preparation of a full Environmental Impact Statement (EIS).

SECTION 3: The proposed recommended Permanent Transfer of Colorado River main stem water to central Arizona does not meet the criteria for a categorical exclusion from analysis or the criteria for the preparation of only an Environmental Assessment (EA) under NEPA.

SECTION 4: The City Council of the City of Yuma urges Reclamation to consider how this Permanent Transfer will affect the endangered species on the lower Colorado River.

SECTION 5: The City Council of the City of Yuma urges Reclamation to consider how this Permanent Transfer will affect the human environment in the Yuma area, including, but not limited to, water quality and the ability for the City of Yuma to treat Colorado River water to drinking water standards; the diminished water supply and quality to the Yuma area for economic opportunities; and the Permanent Transfer's effect on hydroelectric power generation at Parker Dam and the increased costs to the Yuma area.

SECTION 6: The City Council of the City of Yuma urges Reclamation to consider the precedent that this first-ever Permanent Transfer will set and cumulative effects of any transfer, like this Permanent Transfer, that are used to facilitate growth, when the Colorado River is at historic shortages and the Seven Colorado River Basin States are negotiating with one-another and Reclamation on the Post 2026 Operations of Colorado River facilities and management of the Colorado River.

SECTION 7: The City Council of the City of Yuma further urges the Secretary of the Interior to delay consideration of the Transfer until such time as the Arizona Reconsultation Committee has had an opportunity to formulate guidance and policies relating to future Colorado River water transfers that take into account water levels in Lake Mead and Lake Powell, the needs of all Colorado River water users, and not just the needs of Arizona's major metropolitan areas.

SECTION 8: In this particular case, the City of Yuma opposes the Permanent Transfer, as presented, or any transfer of fourth priority water from rural On-River entitlements during a time when the Colorado River is facing alarmingly low hydrology and low flows and when Lake Mead and Lake Powell are at or near historic lows, and requests the Secretary of the Interior deny approval of this Permanent Transfer, as presented, in its entirety.

SECTION 9: The City Council of the City of Yuma urges Reclamation to consider a No Action Alternative on the Permanent Transfer, as presented.

SECTION 10: The City Council of the City of Yuma urges Reclamation to provide “a reasonable range of alternatives to the proposed agency action” as provided by 42 United States Code section 4332 and urges Reclamation to consider prohibiting the Permanent Transfer, and any future similar transfer, while the Colorado River is experiencing shortages and levels of Lake Mead fall below 1,145 feet elevation line, the historic average baseline of Lake Mead and the elevation at which Normal or Intentionally Created Surplus Conditions operate according to the Bureau of Reclamation.

SECTION 11: That the City Administrator of the City of Yuma is directed to prepare an official comment for the Federal Record in this matter and the City Clerk of the City of Yuma is directed to send a copy of this Resolution to the Secretary of the Interior, the Commissioner of the Bureau of Reclamation, the Governor of Arizona, Yuma’s Federal and State legislators, the Mayor and Council of the Town of Queen Creek, Arizona, the Director of the Arizona Department of Water Resources, and the Statutory Agent of GSC Farm LLC, a Delaware limited liability company

Adopted this _____ day of _____, 2025.

APPROVED:

Douglas J. Nicholls
Mayor

ATTESTED:

Lynda L. Bushong
City Clerk

APPROVED AS TO FORM:

Richard W. Files
City Attorney