



CITY COUNCIL
James Tucker – Mayor
Ida Obeso-Martinez – Mayor Pro-Tem
Stacy Mendoza – Councilmember
Katie Burnworth – Councilmember
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CITY CLERK
Kristina M. Shields

CITY MANAGER
Dennis H. Morita

CITY ATTORNEY
Katherine Turner

September 17, 2025

The Honorable Gavin Newsom
Governor, State of California
1021 O Street, Suite 9000
Sacramento, CA 95814

**RE: SB 346 (Durazo) Local agencies: transient occupancy taxes: short-term rental facilitator.
Request for Signature**

Dear Governor Newsom,

The City of Imperial respectfully requests your **signature** on SB 346, which would better equip cities to enforce local ordinances related short-term rentals, including the collection and remittance of transient occupancy taxes (TOT).

Short-term rentals are regulated exclusively at the local level via the adoption of an ordinance that often includes regulations on permitting, tax compliance, noise, parking, occupancy, as well as other responsibilities for hosts and short-term rental facilitators. In some instances, ordinances limit the number of short-term rentals allowed to operate lawfully, other ordinances ban short-term rentals entirely.

Short-term rentals can present numerous challenges to neighborhoods and adjacent property owners. They may create additional noise, traffic, parking, and public safety issues, decrease available housing stock, and in some cases turn residential neighborhoods into de-facto hotel rows, collectively creating additional demands on local public service providers.

Unfortunately, the enforcement of TOT ordinances and the collection and remittance of these taxes from short-term rentals can be inconsistent, even when voluntary collection agreements are in place with a short-term rental facilitator. Cities lack access to property addresses or other property-related information, even under these agreements, resulting in a difficult choice to either accept tax payments without any way to verify their accuracy and legality or to collect taxes directly from property owners—a costly and time-consuming process. Meanwhile, short-term rental facilitators have full knowledge of these properties' locations and resist disclosing this information. Cities can only compel short-term rental facilitators to disclose this critical

information through certain legal action, such as subpoenas. This is not how oversight of public dollars should work.

SB 346 would address the above issues by providing cities with the physical address of each short-term rental listed on the facilitator's website and full audit authority of TOT dollars. These changes would ensure the correct amount of TOT is being collected and remitted and would allow for more efficient enforcement against unlicensed units.

For these reasons, the City of Imperial requests your signature on SB 346.

Sincerely,



James Tucker
Mayor
City of Imperial

Cc: Governor Gavin Newsom
Catherine Hill, League of California Cities, Regional Public Affairs Manager
League of California Cities, (via email: cityletters@calcities.org)



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The Honorable Gavin Newsom
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1021 O Street, Suite 9000
Sacramento, CA 95814

RE: SB 707 (Durazo) Open Meetings: Meeting and Teleconference Requirements

Oppose Unless Amended

Dear Governor Newsom,

The City of Imperial must respectfully **oppose SB 707** unless it is amended. While our city strongly supports public transparency and accessibility, SB 707, as currently drafted, would impose costly and inequitable new mandates on cities like ours without providing the resources or flexibility needed for implementation.

SB 707 contains positive elements that recognize the need to modernize the Ralph M. Brown Act. However, its prescriptive requirements would create significant fiscal and operational challenges for our city, including:

- Providing two-way telephonic or audiovisual access for all meetings, halting proceedings during any service disruption.
- Translating agendas into all “applicable languages” spoken by 20% or more of residents with limited English proficiency.
- Designating a public space for community-submitted translations, even if inaccurate or misleading.
- Creating and maintaining multi-language webpages for agendas, instructions, and meeting procedures.
- Expanding outreach efforts and electronic systems for agenda access.

For the City of Imperial, the estimated cost of purchasing a new audiovisual system is \$50,000. These new requirements would not be reimbursed by the state, creating a financial burden that would directly impact our ability to provide essential services. The additional audiovisual and

staffing costs would strain our limited budget, and the lack of reimbursement under Proposition 42 (2014) exacerbates this challenge, forcing the city to bear the full financial responsibility.

The bill also applies unevenly across California. Cities of similar size would be treated differently depending solely on county population. Adding to the imbalance, the state itself is not required to comply with the very rules being imposed on cities.

Finally, the January 1, 2026, implementation date does not give local governments sufficient time to budget, procure, and train for compliance. A minimum extension to January 1, 2027, is essential to ensure cities can meet these requirements responsibly.

The City of Imperial remains committed to transparency and engaging the public in meaningful ways. We respectfully urge you to amend SB 707 to remove the most burdensome mandates, ensure equitable treatment of cities, and provide sufficient time and resources for compliance.

For these reasons, the City of Imperial respectfully **opposes SB 707** unless it is amended to address our concerns.

Sincerely,



James Tucker
Mayor
City of Imperial

Cc: Governor Gavin Newsom
Catherine Hill, League of California Cities, Regional Public Affairs Manager
League of California Cities, (via email: cityletters@calcities.org)



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Sacramento, CA 95814

**RE: SB 454 (McNerney): State Water Resources Control Board: PFAS mitigation program.
Request for Signature**

Dear Governor Newsom,

The City of Imperial respectfully requests your signature on SB 454 (McNerney), which would establish a statewide PFAS Mitigation Fund (fund) to help local public agencies, including cities, leverage funding to pay for PFAS remediation and treatment in drinking water and wastewater.

Public water agencies are responsible for delivering safe, clean, and affordable drinking water throughout California. To fulfill that responsibility, public water agencies must comply with federal and state drinking water standards, including PFAS drinking water standards. Drinking water standards can have significant financial impacts on water affordability, which are passed on to ratepayers. This bill would create a much-needed funding tool intended to leverage a variety of funding sources, including future state, federal, and private funding, designated for PFAS remediation and treatment that the State Water Resources Control Board would administer to public water agencies. The fund would help fill a gap for much-needed infrastructure funding associated with treating for PFAS.

SB 454 includes provisions to ensure that the establishment of the fund does not up any additional cost pressures on the state. First, the bill includes that the State Water Resources Control Board costs, should be covered from any deposits into the fund, up to 5 percent of the total monies. Additionally, SB 454, which would become operative only upon an appropriation by the Legislature, aligns with budget trailer bill, SB 105 (Committee on Budget). SB 105 would allocate \$180 million in safe drinking water funding and specifically allows a portion of this funding to be directed to PFAS remediation projects, which could serve as the initial monies into the fund proposed under SB 454.

Like many small and rural communities across California, the City of Imperial operates its own public water and wastewater systems and is fully responsible for meeting all state and federal drinking water quality standards. As PFAS regulations evolve and become more stringent, the cost of compliance will significantly increase, particularly for small systems with limited ratepayer bases and limited funding access. Without dedicated funding assistance, ratepayers would bear the rise in water costs. Additionally, the city may be forced to delay critical infrastructure upgrades. SB 454 is essential for Imperial because it would create a funding pathway to plan, design, and implement PFAS treatment systems without solely relying on ratepayer dollars.

To ensure the availability of safe and affordable drinking water supplies for communities from these forever chemicals, the City of Imperial respectfully requests your signature on SB 454.

Sincerely,

James Tucker
Mayor
City of Imperial



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Catherine Hill, League of California Cities, Regional Public Affairs Manager
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AB 339 (Ortega): Local Public Employee Organizations: Notice Requirements.
(As amended 7/15/25)
OPPOSE

Dear Governor Newsom,

The City of Imperial must respectfully **oppose AB 339**, would require the governing body of a local public agency to provide written notice to the employee organization no less than 60 days prior to issuing any request for proposals, request for quotes, or renewing or extending an existing contract to perform services that are within the scope of work of the job classifications represented by the recognized employee organization, and to engage in potentially extensive and lengthy negotiations regarding each of those actions upon request.

AB 339 would be impractical in its execution, is unworkable for ensuring provision of public services, and undermines local labor negotiations. In addition, AB 339 imposes significant costs to local agencies, including new noticing requirements, extended labor negotiations, and likely delays in services and projects.

AB 339 applies to **any** contract that is within the scope of work of any job classification represented by a recognized employee organization; for local agencies with represented workforces, this essentially means nearly every contract would be subject to notice and possible meet and confer. This provision is considerably broader than the existing requirement for bargaining under the Meyers-Milias Brown Act (MMBA). Under existing law, where contracting out is legally permissible, local agencies are still required to “meet and confer in good faith” with any affected bargaining unit prior to making any decision **that is within the scope of representation**. However, there are several common-sense exceptions to this requirement – including where there is a longstanding past practice of contracting for particular services, or where contracting out is contemplated in the applicable MOU. AB 339 subverts these well-settled principles to the detriment of local public services.

The lack of definition of emergency or exigent circumstances in AB 339 undermines existing emergency contracting authority; further, this provision only applies to the initial notice requirement – not the meet and confer provisions – making the provision nearly meaningless in an emergency circumstance. As first responders, local agencies rely on existing statutes that allow for considerable flexibility to ensure the safety and well-being of our communities. The city experiences emergencies that require immediate action, such as severe flooding situations. This requires rapid decision-making and implementation. Delays in contracting, coordination, or response time can escalate the risk and impact the community more severely.

AB 339 also undermines the existing provisions of the MMBA that ensure that negotiating parties can reach a final agreement on an MOU. Under the section of the measure that authorizes reopening negotiations indefinitely, there is no benefit to employers to finalize negotiations and close on an agreement, and, as a result, no labor peace.

AB 339 deters local agencies from working in partnership with local community organizations, who are at the front lines of providing critical local services. The City of Imperial has long relied on strong partnerships with local community organizations and non-profits to deliver essential services that meet the unique needs of our population. These organizations are often at the front lines of emergency response, public health initiatives, and community development projects. They bring specialized expertise, deep community ties, and the flexibility necessary to respond to the diverse needs of Imperial's residents. AB 339 could introduce new administrative burdens and delays for Imperial.

AB 339 represents a sweeping change to the fundamental work of local governments and will not improve services, reduce costs, or protect employees. For these reasons, the City of Imperial respectfully **opposes AB 339**.

Sincerely,



James Tucker
Mayor
City of Imperial

**Cc: Governor Gavin Newsom
Catherine Hill, League of California Cities, Regional Public Affairs Manager
League of California Cities, (via email: cityletters@calcities.org)**



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**RE: AB 650 (Papan) Planning and Zoning: Housing Element: Regional Housing Needs Allocation.
Request for Signature**

Dear Governor Newsom,

The City of Imperial respectfully requests your **Signature** on **AB 650 (Papan)**, which would allow local governments to begin updating their housing element six months early, provide greater certainty, and reduce ambiguity in the housing element review process.

Since 1969, California's local governments have planned and selected sites for housing at all income levels through the housing element portion of a local government's general plan. Every five to eight years, local governments are required to adopt a blueprint outlining where developers can or cannot build residential developments within their respective communities and obtain certification from the Department of Housing and Community Development (HCD). Local governments plan for their fair share of housing development as determined through the Regional Housing Needs Allocation (RHNA) process. As part of this complex process, local governments submit in their housing elements a variety of essential data, actions, and programs to promote fair, equitable, and affordable housing in their community. Currently, local jurisdictions are planning and zoning for nearly 2.5 million additional homes statewide.

During the 6th RHNA cycle, local governments experienced various challenges in obtaining certification from HCD. Some of the challenges include a short timeline for completing these complex documents and responding to HCD's feedback, a lack of clarity regarding what the state expects from local governments when reviewing additional housing element drafts, and the introduction of new requirements late in the housing element review process.

AB 650 would address these issues by allowing local governments to begin updating their housing element six months early. The bill would also require HCD to provide specific text and

analysis that must be included in the housing element to remedy deficiencies, ensuring that local governments are not penalized when HCD identifies additional deficiencies not previously identified in prior review letters.

AB 650 would also provide greater clarity and certainty to the housing element process, helping to ensure that all jurisdictions adopt a certified housing element on time. Additionally, the measure will help local governments facilitate the creation of more housing by providing resources that enable cities to obtain state approval for their housing plans, thereby creating more certainty for developers hoping to build in California.

The City of Imperial has a small planning team and limited staffing resources. As a result; the city struggled to meet short turnaround times for HCD comments and draft revisions, particularly when guidance shifted or new expectations were introduced mid-process.

Additionally, Imperial is actively working to meet significant RHNA allocations despite being a smaller, rural city with infrastructure constraints and limited developable land. The compressed timeline made it difficult to complete site analyses and rezoning work; conduct public engagement in a meaningful way; and coordinate with developers and regional partners to identify realistic housing opportunities.

AB 650 would directly benefit the City of Imperial by allowing an earlier start to the next housing element cycle, giving our staff more time to develop a thoughtful, compliant, and community-supported housing plan. Ensuring HCD provides clearer, more actionable feedback, which would reduce the number of back-and-forth revisions, saving staff time and taxpayer resources. Help us avoid unnecessary delays in certification that could lead to penalties or missed housing funding opportunities tied to HCD compliance.

For these reasons, the City of Imperial respectfully requests your **Signature** on AB 650 (Papan).

Sincerely,



James Tucker
Mayor
City of Imperial

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Catherine Hill, League of California Cities, Regional Public Affairs Manager
League of California Cities, (via email: cityletters@calcities.org)**