



CITY OF NORMAN, OK STAFF REPORT

MEETING DATE: 05/14/2026

REQUESTER: 208Apache, LLC

PRESENTER: Anais Starr, Planner II

ITEM TITLE: CONSIDERATION OF APPROVAL, ACCEPTANCE, REJECTION, AMENDMENT, AND/OR POSTPONEMENT OF ORDINANCE O-2526-59: AN ORDINANCE OF THE COUNCIL OF THE CITY OF NORMAN, OKLAHOMA, AMENDING SECTION 36-201 OF CHAPTER 36 OF THE CODE OF THE CITY OF NORMAN SO AS TO REMOVE LOTS TWENTY-FIVE (25) AND TWENTY-SIX (26), IN BLOCK SIX (6), D.L. LARSH'S FIRST ADDITION, TO THE CITY OF NORMAN, CLEVELAND COUNTY, OKLAHOMA, ACCORDING TO THE RECORDED PLAT THEREOF FROM CCFBC, CENTER CITY FORM BASED CODE DISTRICT, URBAN RESIDENTIAL FRONTAGE, AND PLACE SAME IN A CCPUD, CENTER CITY PLANNED UNIT DEVELOPMENT; AND PROVIDING FOR THE SEVERABILITY THEREOF. (214 W APACHE; WARD 4)

APPLICANT/REPRESENTATIVE	208Apache, LLC/Rieger Sadler Joyce, LLC
LOCATION	214 W Apache Street
WARD	4
CORE AREA	Yes
EXISTING ZONING	Center City Form-Based Code District, Urban Residential Frontage
EXISTING LAND USE DESIGNATIONS	Urban High
CHARACTER AREA	Core Neighborhood
PROPOSED ZONING	CCPUD, Center City Planned Unit Development
PROPOSED LAND USE	No Change
REQUESTED ACTION	Rezoning to a Center City Planned Unit Development

SUMMARY:

The applicant, 208Apache LLC, requests a Center City Planned Unit Development (CCPUD) for the lot located at 214 W Apache Street to allow the development of a residential duplex, as outlined in Appendix B of the Center City Form-Based Code (CCFBC).

The proposal for this site is to construct a 2,517 square foot, three-story duplex as illustrated in Exhibit B, Site Development Plan. The CCPUD proposes a duplex-style structure with two residential units with six bedrooms per unit. The proposed duplex will set five feet from the side property lines. The applicant proposes eight angled parking spaces located off the alleyway, behind the required Parking Setback Line. At grade Open Space will be provided as indicated in Exhibit B, Site Development Plan. The Parking Setback Line will remain as shown on the CCFBC Regulating Plan.

EXISTING CONDITIONS:

SIZE OF SITE: 0.16 Acres

SURROUNDING PROPERTIES

	Subject Property	North	East	South	West
Zoning (BFS)	CCFBC (Urban Residential)	CCFBC (Urban Residential)	CCFBC (Urban Residential)	CCFBC (Urban Residential)	CCFBC (Urban Residential)
Land Use	Urban High	Urban High	Urban High	Urban High	Urban High
Current Use	Undeveloped lot	Single-Family Detached and CCFBC Multi-family	CCFBC Duplex	CCFBC Multi-family	Single-Family Detached

ZONING DESIGNATION

CCFBC, Center City Form-Based Code

The goal of Norman Center City Vision Project and Plan was to reset the conversation and provide guidance for future development and redevelopment in Center City. The CCFBC is intended to implement the purpose and goals of that Plan by providing strong implementation tools for the Center City area.

The CCFBC shall be applied to new, infill development, and redevelopment within the district both in order to achieve the vision set forth for the Center City and to provide a mechanism for implementing the following specific goals, using both public and private sector investments:

- Capitalize on public investment in existing infrastructure.
- Stabilize and strengthen mixed-use commercial centers and residential neighborhoods.
- Create a pedestrian-oriented and multi-modal district.
- Promote, create, and expand housing options.
- Ensure transit-supportive and transit-serviceable development.
- Ensure a complementary relationship with surrounding neighborhoods;

The creation of transit- and pedestrian-oriented development and redevelopment is dependent on three factors: density, diversity of uses, and design. This Code places greatest emphasis on design, or physical form, because of its importance in defining neighborhood and district character. All places evolve—density and uses can be expected to change over time as the area continues to grow and mature.

LAND USE DESIGNATION

Urban High (UH)

Highly compact, walkable pattern of urban development prioritizing alternative means of transportation. Low to no building space and separation of uses. This area is intended to create opportunities for economic activities attracting a city-wide audience, and place residents closer to services and jobs.

High-intensity areas strive for more residential than non-residential uses with frequent master-planned mixed-use development nodes. Non-residential uses may be more common in UH than in UM or UL due to higher concentrations of population. Gross densities in any single development should be greater than 12 units per acre.

CHARACTER AREA DESIGNATIONS

Core Neighborhood Areas

The Core Neighborhood is a focal point of the city, the traditional central business district, with a concentration of activities such as general retail, service commercial, professional office, mixed-density housing, mixed-use spaces, and appropriate public and open space easily accessible by pedestrians. This area frames the University of Oklahoma campus.

The Core Neighborhood encompasses all historic districts and some existing neighborhood planning areas. One notable aspect of this area is the reinvestment that has been occurring over the past decade.

The Core Neighborhood is defined by smaller, traditionally platted lots and older homes. Most streets within this Character Area are designed on a grid pattern, radiating from the BNSF rail line, and are highly connected to one another. Alleys are prominent and, although often used by local traffic, are in disrepair and in need of maintenance. Towards the commercial centers of this Character Area, taller buildings are more common, with the overarching height of residential structures being three stories or less.

NEAREST PUBLIC PARK

Centennial Park is located approximately a quarter of a mile northwest of the development site. Legacy Trail Park is located approximately a third of a mile east of the development site. Each of these parks can be accessed using available sidewalks and crosswalks along the streets.

PROCEDURAL REQUIREMENTS:

PRE-DEVELOPMENT:

PD26-10

April 23, 2026

Two neighbors were present at the pre-development meeting. They expressed concerns regarding the lack of sufficient parking for the proposed number of bedrooms in this development. They also had stormwater runoff concerns since lot coverage would be

increased on this vacant site and would be over the 65% maximum allowed. The neighbors stated the design was not aesthetically pleasing.

BOARD OF PARKS COMMISSIONERS:

This property does not require platting; therefore, dedication of parkland or fee in-lieu of parkland dedication is not required.

REVIEW COMMENTS:

This application was submitted to the following agencies, departments, and/or divisions for review and comment. An asterisk (*) indicates that the agency, department, and/or division responded with review comments “inconsistent” with AIM Norman Plan. Items italicized and blue in these sections represent City Staff analysis.

CITY DEPARTMENTS

1. Fire Department
2. Building Permitting Review
3. Public Works/Engineering*
4. Transportation Engineer
5. Planning*
6. Utilities

FIRE DEPARTMENT

Fire codes for building construction will be addressed at the building permit stage.

BUILDING REVIEW

Building codes and all applicable trades will be addressed at the building permit stage.

PUBLIC WORKS/ENGINEERING*

The subject property is already platted. The applicant has an approved Lot Line Adjustment, which separated this lot from the original parcel.

The requested 69% impervious surface requires engineered solutions with an Operations and Maintenance Manual along with a drainage report and a Site Grading Plan. At the time of the writing of this staff report these required items had not been submitted. Additionally, the applicant requested an exemption from the requirement in CCFBC to provide engineered solutions to account for the runoff created by the increase in impervious coverage over 65%. Engineered solutions have been installed successfully on many prior projects.

TRANSPORTATION ENGINEER

A traffic impact analysis is not required for this project. At the time of building permit, the proposed inset fire lane will be required to be signed and marked indicating there is no parking allowed.

PLANNING

ZONING CODE CONSIDERATIONS

Purpose – CCPUD, Center City Planned Unit Development

Appendix B

SEC. 520 CENTER CITY PLANNED UNIT DEVELOPMENT

A. Statement of Purpose: It is the intent of this section to provide an alternative zoning district for the Center City Area as defined in the Center City Form-Based Code (CCFBC). This Center City Planned Unit Development District (CCPUD) is specifically catering to the Center City Area because of the size of lots, the lack of vacant land and other distinguishing characteristics in this area that make the use of the existing PUD regulations not feasible. The CCPUD encourages developments that create the character of development envisioned in the CCFBC.

Specifically, the purposes of this section are to:

1. Provide an alternative zoning district to the CCFBC where a property owner proposes a development that does not meet the strict regulations required in the CCFBC.
2. Provide open space/street space that is compatible with the concepts of the CCFBC.
3. Provide comprehensive and innovative planning and design for a development which is consistent and compatible with surrounding developments.
4. Provide more efficient and economic use of land resulting in an urban/pedestrian environment.
5. Provide complete and useful information which will enable the Planning Commission and City Council to make more informed decisions on land use.
6. Encourage developments that achieve community goals, such as, but not limited to, aging in place, or affordable housing, or other emerging trends in housing, that may not be able to meet all the required elements of the City Form-Based Code.

*The applicant is requesting a CCPUD to allow for the development of a three-story duplex with six bedrooms per unit. The applicant proposes a housing type already frequently utilized, and which is not contributing to creative alternatives. Applicant proposes to increase pervious coverage while requesting exemptions from providing engineered solutions, LIDs or an engineered drainage report verifying lack of negative impact on surrounding properties. This proposal is **inconsistent** with the purpose of the CCPUD process.*

Uses Permitted

- The proposed rezoning would allow for a three-story residential duplex with six bedrooms per dwelling unit. A complete list of uses can be found within the attached CCPUD Narrative as Exhibit C.

The applicant requests rezoning to a CCPUD to allow for the construction of a three-story duplex with six bedrooms per unit. The CCFBC requires a minimum of three dwelling units in this area of the Urban Residential Frontage. The CCFBC allows three bedrooms per dwelling unit by right; additional bedrooms above three require either a request for a Special Use Permit or a CCPUD. The applicant submitted a CCPUD Narrative and Site Development Plan to meet the proposed desired development.

The project fronts onto W. Apache Street and is located south of the central business district and north of the University of Oklahoma Campus. To the east of the subject tract is a duplex constructed in 2017 under the CCFBC and designated Townhouse/Small Apartment Building Form Standard at that time. To the north is a single-family structures and a multifamily structure built under the 2023 CCFBC. To the south is a new apartment building constructed under the 2023 CCFBC.

The proposed development is **inconsistent** with the 2023 CCFBC in regard to the minimum required dwelling units and the maximum number of bedrooms per dwelling unit allowed by right.

Area Regulations

- The CCPUD proposes a three-story duplex to be constructed along the Required Build Line, as prescribed by the CCFBC Regulating Plan. The duplex is proposed to have five-foot setbacks from the east and west property lines.

The applicant proposes a duplex with five-foot side setbacks. With these setbacks, the structure will not meet the CCFBC requirement to set the façade at 100% of the Required Building Line (RBL). Additionally, the applicant is requesting to allow 2'4" offset from the RBL instead of the CCFBC allowed maximum amount of 24".

The proposed structure will be set at the existing RBL with a 28-inch offset allowance for jogs and articulation of the facade. This façade placement is similar to the front setback found with the adjacent property to the east. The proposed five-foot side setbacks are consistent with the structure located to the east of the subject tract, which was built under the 2017 CCFBC. The property to the west of the subject tract is a single-family house built in the 1920s or 1930s and has the typical 25' front setback and five-foot side setbacks. The current 2023 CCFBC for Urban Residential maintains this requirement, that a new structure is to set at the RBL for 100% of their length. The proposed duplex is **inconsistent** with the area regulations regarding the Siting requirement along the RBL, a major design element of the Center City Form-Based Code. However, the proposed structure will match the new structures found on the block that were built under older CCFBC regulations in regard to side setbacks.

Height Regulations

- The proposed three-story duplex is shown on the proposed elevations drawing, Exhibit D.

The CCFBC requires a minimum of two-stories and allows a maximum of five stories in this area of the Urban Residential Building Form Standard. The proposed three-story duplex is **consistent** with the height regulations of the CCFBC.

Open Space/Impervious Surface Coverage

- Open Space will be located on the Property in the locations depicted on the CCPUD Site Development Plan. The CCPUD Narrative proposes a maximum of 70% impervious surface coverage. The CCPUD Site Development Plan proposes impervious surface coverage in the amount of 4,853 square feet of the 7,000 square foot lot or 69.32% impervious surface coverage.

The CCFBC for Urban Residential requires a minimum of 15% of the buildable area, defined as the area behind the RBL, to be provided as Private Open Space. In this case, a minimum of 975 square feet of Private Open Space is required. The CCPUD Site Development Plan shows 1,404 square feet or 21.60% of the buildable area is designated as Private Open Space. The CCPUD Narrative states that a minimum of 15% Open Space will be maintained on this lot. The proposed Open Space exceeds the CCFBC minimum requirement.

The CCFBC has a maximum impervious surface coverage of 65% in Urban Residential Frontage. The CCFBC permits impervious surface coverage above 65% with the use of Low Impact Development engineered solutions. In this case, the applicant is proposing a maximum

70% impervious surface coverage for the subject tract without proposing any engineered solutions. This does not meet the CCFBC requirements.

The CCPUD Narrative and Site Development Plan proposes impervious surface coverage which is **inconsistent** with CCFBC impervious surface coverage regulations.

Landscaping

- The CCPUD Narrative states that the site will meet the CCFBC regulations regarding Open Space tree and Street Tree requirements. The CCPUD Site Plan shows four trees located adjacent to the parking lot in the designated Open Space area and two Street Trees in the Tree Lawn.

The CCFBC requires one tree for every 800 square feet of Private Open Space. In this case, there is 1,404 square feet of Open Space which would require two trees. The proposed CCPUD Site Development Plan proposes four trees in the rear yard which exceeds the CCFBC requirements. The proposed Street Trees shown on the Site Development Plan meet the CCFBC requirements.

The proposed landscaping meets and exceeds the CCFBC requirements and is therefore **consistent** with the regulations.

Traffic Access, Circulation, Parking, and Sidewalks

- Traffic circulation and access to the Property shall be allowed in the manner shown on the CCPUD Site Development Plan.
- The existing front driveway approach will be removed, as required by the CCFBC regulations.
- A six-foot sidewalk will be installed along W. Apache Street as shown on the Site Development Plan.
- Eight parking spaces off the alleyway are proposed with this CCPUD.

The Site Development Plan proposes access off the alleyway as required by the CCFBC regulations. The proposed six-foot sidewalk meets the City's sidewalk requirement.

The CCPUD Narrative proposes a duplex with six bedrooms in each dwelling unit. The CCFBC parking regulations require a parking space for each bedroom resulting in twelve required parking spaces. The CCPUD Narrative and Site Development Plan propose only eight parking spaces. For this reason, this proposed development is **inconsistent** with the CCFBC parking regulations.

Lighting

- The project shall comply with the requirements of the CCFBC under Section 402(N), Lighting & Mechanical, as amended thereafter.

Lighting within the development will be **consistent** with applicable City regulations.

Signage

- All signage for the Property shall comply with Section 402(M), Signage, of the CCFBC, as amended thereafter.

*The proposed development will be **consistent** with the regulations under CCFBC Sign standards.*

Screening

- Perimeter fencing with a maximum height of eight feet is allowed by the CCPUD Narrative, but none is shown on the CCPUD Site Development Plan. The CCPUD Narrative proposes a street wall with a height of five feet along the RBL on each side of the proposed structure. The street wall is illustrated in the included elevation drawings on Exhibit D.

*The CCFBC regulations require a minimum Street Wall of not less than five feet in height along the RBL frontage that is not otherwise occupied by a building. In this case, the CCPUD is proposing five-foot brick street walls along the RBL from the edge of the building to the side property lines which meets the CCFBC requirement. The proposed allowance for perimeter fencing and street walls meets the CCFBC requirements. For these reasons, the screening and fencing are **consistent** with the regulations.*

COMPREHENSIVE PLAN CONSIDERATIONS

Character Area Policies

General Policies

Residential Policies

- New residential development should blend with existing housing, incorporating tools such as buffering requirements and right-sized public spaces as defined in land use categories.
- Accommodate a variety of housing styles, sizes, densities, and price points to suit diverse housing needs.
- New residential developments should use a variety of techniques to avoid the appearance of identical homes, increasing vibrancy and diversity in the built environment.

The proposed duplex will utilize brick, stoop, and façade design as shown in Exhibit D which are similar to adjacent properties and will blend with the designs in the redeveloping neighborhood on W Apache Street. The CCPUD submitted elevations proposing to differentiate the two units of the duplex by utilizing different brick colors.

The CCPUD proposal for a duplex with six bedrooms in each unit seeks to return to a housing type prevalent in the Center City pre-2019 and is a different housing type from the recently built multi-family developments constructed under the revised 2023 CCFBC. The adopted amendments of 2019 and 2023 of the CCFBC sought to encourage a variety of housing types and limit the repetition of multibedroom duplex units. However, the proposed duplex is a residential building with a design that blends with the existing adjacent property.

*The proposed development is **inconsistent** with the Character Area General Residential Policies because it seeks a housing type already frequently available in other areas near the University of Oklahoma Campus outside the Center City Form-Based Code District.*

Core Neighborhood Areas Policies

- Continue to maintain and improve public facilities and infrastructure that supports infill development and reinvestment.
- Residential development should reinforce the Core through a combination of rehabilitation in the downtown area and compatible new infill development targeted to a broad range of income levels, including multi-unit townhomes, apartments, lofts, and condominiums.
- Focus mobility infrastructure on pedestrian comfort, safety, and convenience where there are smaller lots and greater proximity to a range of services.
- Ensure that redevelopment and infill developments:
 - Address the impacts of parking and access:
 - Off-street parking should be screened from public right-of-way, and placed in the rear of the lot for all development.
 - For residential development, access to garages and parking pads are encouraged from a rear loaded alley.
 - Alternative modes of transportation, including walking, rolling, biking, and public transit should be a priority with safe, clear connections. This includes improving sidewalks and filling gaps in the sidewalk network during development.
 - Reflects the scale and characters of surrounding properties:
 - Structures should not be significantly taller, further from the front property line, or be inconsistent with the massing of neighboring properties.
 - Reduce the impact of higher intensity uses to adjacent lower intensity uses with screening and landscaping. Native landscaping is encouraged.
 - Encourage activation of the street space along arterials with pedestrian amenities.
- Increased impervious area coverage should be mitigated using LID stormwater BMPs regardless of parcel size or existing impervious area coverage.
- New architecture should be compatible with existing neighborhoods. Modern, contemporary architecture should be limited but can be accommodated as long as scale transitions and architectural elements achieve continuity.

The CCFBC requires one parking space per bedroom. In this case, a total of twelve parking spaces is required. The CCPUD Site Plan shows eight parking spaces in the proposed parking lot off the alleyway.

*Since the proposed CCPUD does not fully address the impact of the parking by supplying sufficient parking, the proposed development is **inconsistent** with the Core Neighborhood Character Area policies.*

Land Use Development Policies

Urban High Policies

- Highly compact, walkable pattern of urban development prioritizing alternative means of transportation. Low to no building spacing and separation of uses. This area is intended to create opportunities for economic activities, attracting a city-wide audience, and place residents closer to services and jobs.
- High-intensity areas strive for more residential than non-residential uses with frequent master-planned mixed-use development nodes. Non-residential uses may be more common in UH than in UM or UL due to higher concentrations of population.
- Gross densities in any single development should be greater than 12 units per acre.

*The proposed development consists of a three-story brick structure with two dwelling units. The proposed duplex meets the gross density of 12 units per acre. For this reason, the development is **consistent** with the Urban High Land Use policy.*

Building Types

- Medium and Small-scale 3- to 5-story buildings are common. Within existing developed areas, buildings may go up to 2-stories higher than surrounding properties.
- Multi-unit structures are the priority, but a variety of housing types from townhomes to apartments are expected.
- Mixed-use buildings including retail, work-spaces, and residences are most common.
- Public and private spaces (i.e. balconies, recreational roof decks, outdoor dining, etc.) are clearly defined and cultivate a sense of place.
- New developments that are single-use developments or predominantly single-unit or garden apartments are not appropriate.

*The proposed development features a three-story building, which is a common residential building height found in the surrounding developing Center City. The proposed duplex is a housing type sought by the Urban High Land Use designation. Since the CCPUD is proposing a duplex with a similar height and design, the proposed development is **consistent** with the Urban High Land Use policy for Building Types.*

Site Design

- The scale and layout of the built environment are conducive to walking. Trails and pathways are integrated throughout developments to connect to parks, neighborhoods, and community destinations.
- Multi-unit developments without connections to neighboring properties and uses weakens the development pattern and should be limited or avoided altogether.
- Street trees should form a continuous urban canopy over public areas and rights-of-way.
- Stormwater to be addressed at the project level, but designed as part of a larger neighborhood or sub-basin system.
- Site layout should take every opportunity to maximize the public infrastructure available in this area.

A six-foot sidewalk is proposed along W Apache Street with this development request. This will match the width of the existing adjacent sidewalk to the east. The proposed sidewalk will connect to the existing sidewalk system in the Center City, allowing residents pedestrian access to the University of Oklahoma and the central business district. Furthermore, the applicant proposes a stoop which will connect residents to the sidewalk system and encourage active pedestrian transportation.

*The CCFBC requires a maximum of 65% impervious coverage unless Low Impact Development engineered solutions are proposed to mitigate the effects of the additional impervious surface coverage. In this case the applicant is seeking relief from impervious surface requirements and does not propose the utilization of any low-impact development techniques to mitigate stormwater. For this reason, the development is **inconsistent** with the Urban High Land Use policies.*

Transportation

- This area features a relatively dense grid of streets and sidewalks. A full street hierarchy provides a variety of connections and route choices to people moving to, through, and within the area. Parking is a secondary use and should be as small as possible due to character and value of land in the area. Most of these areas have, or will have, easy access to public transportation (less than one half-mile walk of a stop). Improving access for pedestrians and bicyclists will continue to be a priority, including modernizing multi-modal infrastructure.

The development site is located half a mile north of the University of Oklahoma's South Oval and a third of a mile south of Main Street in the central business district. Additionally, there is an Embark bus stop 0.07 mile from the subject tract. Due to its location and available network of sidewalks, the proposed development has the opportunity for a pedestrian only mode of transportation.

*The development is **consistent** with the Urban High Land Use policy.*

Utility Access

- A full range of utilities should be available. If services are not already in place, they must be extended by the developer during the lot split process to be suitable for development. If development occurs adjacent to existing facilities that are determined to be insufficient to meet the demands of the proposed development, the developer must upgrade the existing facilities to enhance the capacity of the utility systems.

*The proposed development has existing water and sewer access. The development is **consistent** with Utility Access policies.*

Public Space

- Consisting of appropriately scaled public spaces including small parks, plazas, parklets, regional trail connections, and walking paths. Pedestrian amenities should be commonly integrated into public and private projects.

*The existing development proposes the installation of a six-foot sidewalk which will link to the public sidewalks found in Center City providing walkable access to the University of Oklahoma Campus, Campus Corner and the central business district. This residential duplex development is **consistent** with the Urban High Land Use policy regarding Public Space.*

Neighborhood and/or Special Area Plans

*This location is **not** within a Neighborhood or Special Planning Area.*

UTILITIES

AIM NORMAN PLAN CONFORMANCE

Proposed development is in accordance with AIM Water and Wastewater Utility Master Plans.

SOLID WASTE MANAGEMENT

Proposed development meets requirements for City streets and provides access for solid waste services. Polycarts are shown on the Site Plan and are adequate for servicing the duplex.

WATER/WASTEWATER AVAILABILITY

Water Availability

Adequate capacity within the water system exists to serve the proposed development. Existing water service(s), if not to be reused, must be abandoned at the water main. If existing service(s) is to be reused, it must have materials identified.

Wastewater Availability

Adequate capacity within the wastewater system exists to serve the proposed development. Existing sewer service(s), if not to be reused, must be abandoned at the sewer main.

DISCUSSION:

The proposed development aligns with many of the AIM Norman Land Use and Character Area objectives. This proposal will provide additional residential units to this area of Norman in the form of a duplex.

The CCPUD Narrative proposes amendments to allow for the development of a three-story duplex with six bedrooms in each dwelling unit. Since 2019, amendments to the CCFBC have sought to limit the multi-bedroom housing type, while encouraging a variety of housing types. This CCPUD is proposing a multi-bedroom duplex and seeks relief from: minimum twelve parking spaces requirement, required mitigation solutions for increased impervious surface coverage, and CCFBC Siting requirements. However, the proposed structure will continue several of the essential CCFBC design elements seen along West Apache Street, including building the façade to the Required Build Line, façade articulation differences between the two units, and the street walls along the RBL.

CONCLUSION:

Staff forwards this request for Center City Planned Unit Development and Ordinance O-2526-59 to Planning Commission for consideration and a recommendation to the City Council.