

GENERAL INFORMATION

Applicant: City of Bloomington

Location: Citywide

Request: Study item to review the draft sign ordinance prepared by staff.

HISTORY

Planning Commission Action: 01/12/23 – Study Item (Case #PL2022-245)

City Council Action: 01/23/23 – Study Item (Case #PL2022-245)

City Council Action: 08/29/23 – Adoption of Ordinance #2023-22, establishing policies and procedures for the installation of murals (Case #PL2023-89).

CHRONOLOGY

Planning Commission 11/16/2023 – Study Item held

City Council 11/27/2023 – Study Item scheduled

STAFF CONTACT

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PROPOSAL

Staff will present the initial revised sign ordinance draft to solicit questions and feedback from the Planning Commission and City Council. The attached draft ordinance represents the draft signage regulations. The draft ordinance would fully replace Article X of Chapter 19 of the City Code, the existing sign ordinance. Prior to preparing the full or complete version of the ordinance, staff seeks feedback to build a consensus about the proposed regulatory standards and approach. Full ordinance preparation can proceed after receiving this initial round of feedback. There is a significant number of cross-references throughout the City Code related to signage standards ge

nerally. By first presenting a draft sign code for review, comment, and consensus absent the other changes that will be necessary throughout the City Code, staff believes the updates that are necessary outside of the sign code can be completed more efficiently.

BACKGROUND

The Sign Ordinance Update is identified on the 2023 Planning Commission Work Plan. Research, coordination, public engagement, and ordinance drafting activities have increased over the second half of 2023. In order to evaluate the existing sign code and receive higher level policy guidance, staff conducted study sessions (Case #PL2022-245) with the Planning Commission and City Council in January of 2023. As part of these study sessions, staff identified various sign code challenges or improvement opportunities. Staff also conducted a polling exercise with both bodies inquiring about a multitude of specific sign policy questions. The questions polled included the amounts of freestanding and building signage allowed, electronic sign standards, use of Uniform Sign Designs for multi-tenant buildings, billboard standards, and mural standards to name a few. The results of these polls were utilized by staff to establish where clear or overwhelming consensus from a directional perspective existed among the Planning Commission and Council. If an overwhelming consensus did not exist on a particular question, staff relied more heavily upon best practices as informed by broad research.

As part of evaluating the existing sign code, Planning and Legal staff sought analysis from outside legal counsel who is a nationally recognized expert in legal matters pertaining to signage and other forms of expression – John Baker with Greene Espel PLLP. Mr. Baker identified regulations within the existing sign code that are no longer compatible with recent case law. Some of these core concepts are explained in further detail in the staff reports presented to the Planning Commission and City Council as part of the first study sessions conducted in January of 2023. Staff incorporated this guidance into the drafting of the new sign code.

ANALYSIS

As part of the initial study sessions in January of 2023, staff established three goals to guide the success of the overall project:

- 1) Conform with current legal standards;
- 2) Improve clarity and reduce complexity; and
- 3) Improve organization, formatting, and user experience.

These three goals continue to guide decision making as staff moved into drafting sign standards. The regulatory approach of the draft sign code is similar to the existing regulations in that all Bloomington sites are assigned into sign districts based on their respective base zoning designation. A site's permanent signage allowances are predominantly driven by its assigned sign district, which establishes the types, locations, sizes, heights, and other elements of permitted signage. However,

the draft sign code differs in that the existing sign code lists all allowances for signage in an extensive list format under each individual sign district within their own dedicated sections. The draft sign code takes a different approach in laying out allowances for freestanding or building signs in dedicated sections, wherein the allowances for each individual sign district are presented in table format.

In addition to dedicated sections for freestanding and building signage, the draft sign code has sections dedicated to the following categories of signs: exempt signs, prohibited signs, regulated but exempt from permit signs, temporary signs, electronic signs, video signs, and billboards. One of the challenges of the existing sign codes is that there is a wide variety of regulatory content mixed together. The draft sign code seeks to remedy this situation by laying out the standards for various types of signage in clear and dedicated sections.

Staff will present the draft ordinance in detail before both the Planning Commission and City Council. While the following sections of the staff report summarize important elements and concepts associated with the draft ordinance, the review of the draft ordinance language and specific standards therein is the most important aspect of the planned study sessions. As such, the subsequent staff report does not describe every standard or policy decision that was considered throughout the drafting process. Rather, it is intended to provide background information about the process and directional thinking about the regulations contained within the draft ordinance. More specifically, the staff report highlights some ways in which the draft ordinance is consistent with the three overarching goals of the project listed above.

Sign Districts

One of the ways that staff is attempting to simplify the sign code is to reduce the number of sign districts that govern the allowances for freestanding and building signage. All properties in Bloomington are currently assigned a sign district according to the base zoning district of a given parcel. The existing sign code has eight sign districts, whereas the draft sign code proposes five sign districts (identified in Sec. 21.304.14). Table 1 below compares the existing sign code versus the draft sign code by identifying what zoning districts are included in each sign district. An explanation of how sign districts were consolidated in the draft sign code is also provided.

The draft sign districts are structured in such a way to meet the unique characteristics of development areas in Bloomington according to their base zoning designation, the uses allowed within these zoning districts, and in some cases considerations paid to special location circumstances, such as being located along the interstate or trunk highway.

Table 1: Existing and Draft Sign Districts

Sign Districts and Corresponding Zoning Districts		Comment
Existing Sign Code	Draft Sign Code	
Class I (R-1, R1-A, RS-1, and SC)	Class I (R-1, R1-A, RS-1, and SC)	The Class I Sign District includes the same zoning districts in both the existing and draft sign code.
Class II (R-3, R-4, RM-12, RM-24, RM-50, RM-100, and RO-24)	Class II (R-3, R-4, RM-12, RM-24, RM-50, RM-100, RO-24, B-1, and I-1)	The proposed Class II Sign District combines the existing Class II and Class III Signs Districts in the existing sign code. Differentiation of standards within this district are established between residential and nonresidential uses.
Class III (B-1 and I-1)		
Class IV (B-2, C-1, C-4, IP, I-2, I-3, CO-1, CS-0.5, CS-1, FD-2, and IT)	Class III (B-2, C-1, C-2, C-3, C-4, CR-1, IP, I-2, I-3, CO-1, CS-0.5, CS-1, FD-2, and IT)	The proposed Class III Sign District combines the existing Class IV and Class V Signs Districts in the existing sign code. This proposed sign district encompasses the most commercial and industrial zoning districts, and the standards therein are anticipated to be the most widely applied. Increased allowances for freestanding sign size and heights for sites adjacent to I-494, I-35W, and TH-77 are incorporated, which are an important feature of the existing Class V Sign District.
Class V (CR-1, C-2, and C-3)		
Class VI (CX-2)	Class IV (CX-2)	The existing Class VI Sign District is renumbered to the Class IV Sign District, but otherwise remains the same in that it is only applicable to the CX-2 zoning district. The CX-2 zoning district is applicable to the Mall of America and surrounding properties envisioned for regional or destination entertainment uses.
Class VII (HX-R)	Class V (HX-R, B-4, C-5, LX, and TI)	The existing Class VII and Class VIII Sign Districts are consolidated into the new Class V Sign District, including consistent signage standards for all the mixed-use zoning districts.
Class VIII (B-4, C-5, LX, and TI)		

Signage Allowances

The draft sign code proposes to revise allowances for freestanding and building signage in multiple ways, but in a manner that yields close to an equivalent amount of signage that is allowed under the existing sign code. Adjustments to signage allowances include the following:

- **Methodology Determining the Amount of Signage** – In some sign districts (Class III, IV, and V), the draft sign code utilizes lot and building frontage distances to determine the size or amount of permitted signage for a given lot line along a street or building elevation. The method also includes caps or maximum amounts of signage. Utilizing lot or building frontage is an effective and less complex method to determine signage allowances, as these figures are readily available for all sites and buildings in Bloomington. For freestanding signs, the existing sign code has flat signage amounts across all sign districts, as opposed to adjusting permitted sign size based on site size. Having the amount of signage tied to the size of a property is a superior approach to managing freestanding signage, particularly along busier commercial corridors. For building sign allowances, the current sign code utilizes building elevation areas as a means of calculating the maximum amount of signage on a percentage basis. The drawback of this approach is that building owners/tenants or the City do not always have accurate architectural drawings of all buildings in Bloomington, making this exercise less precise.
- **Quantity of Signage** – Sections 21.304.16 and 21.304.17 establish the maximum allowances for sign area, in addition to the maximum number, locations, height, and other elements of signage. The approach for Sign Districts I and II cap maximum signage allowances based on flat values, similar to the existing sign code. Alternatively, Sign districts III, IV (except for building signs), and V utilize multiplication factors or ratios based on the lot or building frontage to inform the total permitted amount of signage. For example, in the Class III Sign District, staff proposes that freestanding signage area be allowed at a rate of 0.4 square feet per lineal foot of lot frontage (up to a maximum of 100 sq. ft.). Also in the Class III Sign District, building signage area would be granted at a rate of 1.25 square feet per lineal foot of tenant space or building frontage (with no individual sign exceeding 250 square feet).

The rates or ratios that inform allowances for freestanding and building signage in the various sign districts were informed by two methods of research: 1) Evaluating over 50 recent signs installed in Bloomington, and 2) Comparisons to other jurisdictions and model ordinances which utilize lot and building frontage calculations to inform their sign allowances. With respect to method number 1, staff reviewed over 50 building signs and over 25 freestanding signs in Bloomington to test the multiplication factors. The recommended multiplication factors are intended to create equivalent opportunities for freestanding and building signage that currently exists in Bloomington in most circumstances.

- **Complexity of Allowances** – The draft sign code seeks to reduce the complexity of signage allowances for both freestanding and building signs in a number of ways, including:

- **Primary vs. Secondary Building Elevations** – Regarding building (wall) signage, the current sign code has separate area or size allowances for primary vs. secondary building elevations. The draft sign code does not include, nor does staff recommend, separate signage allowances for different building elevations.
- **Sign Area Assigned by Sign Type** – In addition, the existing sign code has separate allowances for different types of building signage (wall, awning, canopy, separate entrance signs, etc.). The draft sign code establishes a base amount of building signage applied on a per elevation basis, which can be distributed amongst multiple sign types. Through improved permit record retention systems, staff should be able to confidently report back to property owners and tenants the amount of signage that exists on a given building elevation to help make informed decisions about how to deploy their allowances for signage.
- **Different Signage Allowances for Single vs. Multi-Tenant Buildings** – The existing Class IV Sign District has different allowances for freestanding signage according to whether or not there are multiple tenants or occupancies on a single site. While this approach appears to be sound in theory, in practice staff has not observed significant differences in the sizes of signs for single tenant vs. multi-tenant sites. Rather, these types of standards add complexity without adding an equivalent amount of value in staff's judgment.

These are just a few examples where staff has sought to limit or reduce complexity in the draft sign code. There are additional examples scattered throughout the existing sign code that make its administration by staff and comprehension by the public challenging.

- **Number of Freestanding and Building Signs** – Allowances for the number of freestanding signs generally follows the approach of the existing sign code by allowing one freestanding sign per street frontage. This general approach has been successful in managing the quantity of permanent freestanding signs in Bloomington for the most part. Regarding building signage, the quantities of wall or other building signs in many ways match the existing sign code. However, one notable change to highlight is that staff proposes that building signs in the revised Class III Sign District, comprising most commercial and industrial sites, be allowed on all four elevations of a building. This allowance is a departure from the current standard that limits building signs to elevations facing public street frontages or two elevations, whichever is greater. Staff is proposing this change for two main reasons: 1) The impact of building signage, particularly when not oriented towards frontages along streets, can be lessened by limiting sign lighting or brightness, and 2) limiting building signs to two elevations can stifle creativity and be a barrier to dynamic commercial spaces. So long as the nuisance characteristics of building signs, mainly sign lighting and brightness, can be effectively managed, staff is supportive of creating greater allowances for these signs.

Sign Types

Allowances for types of signs by sign district are expressed in Sec. 21.304.15 of the draft sign code in tabular format, similar to the Use Tables within the Zoning Code. The draft sign code does not

propose a significant number of changes with respect to sign types. However, there are a few changes to highlight as follows:

- **Ground and Monument Signs** – The existing sign code has two similar sign types that only differ according to the height of the sign (ground signs are eight feet or less, monument signs are taller than eight feet). Staff eliminated this distinction and now all allowances for these signs are grouped under monument sign, with corresponding limitations on sign height according to respective sign district of the location.
- **Removed Sign Types** – Sign types that have been removed include marquee, spandrel, and rotating sign. These sign types are not common in Bloomington. They are less valuable with the regulatory approach for building signs shifting to a more general allowance, as opposed to unique allowances by type.
- **Uniformity of Building Sign Construction** - One of the policy decisions reflected in the revised sign code is not requiring uniformity of construction style (cabinet vs. channel letter signs) for building signs. Staff understood some support for uniformity was expressed by some Planning Commission and Council members as part of previous study sessions. However, after researching this matter further and thinking through the regulatory and procedural implications of maintaining such a standard, staff does not recommend retaining this requirement in the draft sign code. There are multiple reasons staff does not recommend this direction.

First, requiring one construction type or another can cause conflicts with individual businesses, particularly in multi-tenant settings, whose logo or trademark does not work well with one particular construction style or another. Such a standard can limit a business' ability to choose their own precise sign design.

Second, tracking construction uniformity requirements typically necessitates a site or building to create and follow a comprehensive sign plan (currently Uniform Sign Designs) for their property. The staff report does discuss comprehensive sign plans later on in the report, but staff's preference is that such an application or process be optional or discretionary for property owners to pursue, not mandatory. If uniformity of construction is an important standard for a particular site, the draft sign code would still offer a pathway to that end without requiring such a tool for sites that do not want such a governing document.

Third, staff does not recommend requiring uniformity of sign construction because it is less clearly tied to upholding the purposes and intent of the sign code (health, safety, welfare, protecting against harm to the physical environment, etc.) than other sign standards, such as limits on the size, height, or location of signs. Uniformity of construction is a standard more tied to aesthetic preferences than fulfilling a public health or safety purpose in staff's judgment.

Finally, channel construction signs are typically more expensive to fabricate and install than cabinet style signs. By requiring uniformity of construction, the downstream result can sometimes force a business to have to purchase a more costly sign. Requiring businesses to install a more costly sign type for uniformity purposes does raise concerns about equity, especially in support of smaller and newer businesses.

At the end of the day, the property owner can also impose their own specifications for signage in the case of a tenant. The question becomes whether or not the sign code has a role in determining the outcome of a decision that may be better negotiated amongst private parties.

Special Use Signage Standards

The draft sign code seeks to reduce the utilization of special signage standards for specific uses where feasible. The existing sign code has dedicated sections to special use signage for the following uses: office buildings over seven stories, hotels, college and school (K-12) campuses, high usage parks, motor vehicle sales, and convenience facilities with fuel sales. While the draft sign code has eliminated dedicated sections to special use signage, there are some special standards necessary for unique uses that are included in the freestanding and building sign sections. Staff will highlight these elements in greater detail as part of the staff presentation.

Electronic and Video Signs

As technology improves and becomes more affordable in the future, staff anticipates that the quantity of electronic signs will increase. The draft sign code includes the following important elements applicable to electronic signs (found in Sec. 21.304.18):

- **Maximum Size** – To limit the impact or nuisance characteristics of electronic signs, staff proposed a maximum size of 150 square feet.
- **Setback from Residential** – Staff proposes a minimum setback of electronic signs from residentially zoned and used sites of 100 feet. This standard is a carry-over from the existing code. However, the existing code also has an orientation standard that prohibits electronic signs that are oriented towards residential sites within 150 feet of the sign, which often acts akin to an additional setback standard.
- **Dwell Time** – Staff proposes to retain a static dwell time of eight seconds for electronic changeable copy signs and suggests a proposed dwell time of 10 minutes for signs with graphics, a reduction from the existing standard of 20 minutes. The initial feedback that staff has received, both internally and externally, about the proposed dwell time for electronic signs that deploy graphics is mixed. Planning, Traffic, and Engineering staff generally favor longer dwell times to reduce driver distraction, enhance public safety, and reduce visual clutter and harm to the physical environment. Other parties, both within the City of Bloomington and private, have expressed an interest in reducing dwell times to harness the technology's ability to increase content and messages. Staff is currently recommending a dwell time of 10 minutes for signs with graphics, as it represents a balance point of increasing the number of messages or content that can be disseminated while upholding traffic safety. Through researching the dwell time standard of many other nearby cities, there was a mix of communities allowing a lower dwell time and multiple communities with higher standards. Electronic sign dwell times is not a regulatory area that has a broad consensus, at least amongst the literature and cities reviewed by staff.

- **Nighttime Use Restriction** – Staff proposed when an electronic sign is located within 150 feet of residentially zoned and used sites, the sign must be static or turned off between the hours of 9:00 p.m. and 7:00 a.m., as it is often the transitions of these signs that present the greatest nuisance. Electronic signs also have nighttime brightness restrictions in the lighting ordinance. Such restrictions increase when signs that are within 500 feet of residential uses.

The video sign standards in the draft sign code mirror those in the existing sign code. These standards do not allow video signs to be visible from any structure on a residential lot or any traveled highway, street, trail, or bikeway. This orientation limitation has effectively made it very difficult to site a video sign in such a way that is code compliant.

Regulated but Exempt from Permit and Temporary Signage

The draft sign code maintains many of the standards applicable to regulated but exempt from permit signs and temporary signs that have served the City well. Changes to these standards have mostly been focused on bringing them into conformance with current legal standards with respect to content neutrality. The existing sign code has these two sign types mixed, reflecting a poor organization that can be confusing. The draft sign code separates these sign types into dedicated sections.

Billboards

The draft sign code wraps the City's billboard standards back into the broader signage regulations. However, restrictions on existing billboards and prohibitions on new billboards are proposed to remain. Due to their significant size and typical locations along high-volume roadways, billboards require increased attention paid to traffic safety and harm to the physical environment of Bloomington. As part of the previous Planning Commission and City Council study sessions, both bodies supported retaining existing restrictions on new or expanded billboards. The draft sign code follows this guidance.

Sign Illumination

The draft sign code seeks to increase consistency for sign lighting and lumination standards. A proposed standard prohibits luminated signs that are both visible and within 100 feet of residentially zoned and used sites. The existing sign code also includes proximity standards for luminated signs, but the distance is not consistent between sign districts. The draft sign code would make this proximity standard consistent throughout all sign districts. Sign brightness, fixture cutoff, and other lighting standards will continue to remain unchanged in the lighting ordinance. These standards have served staff well and are not proposed to be changed.

Comprehensive Sign Plans

The existing sign code requires Uniform Sign Designs for multi-tenant buildings and a few other signage scenarios or uses. The draft sign code proposes to replace the existing Uniform Sign

Design tool with a new tool called a comprehensive sign plan, but limit their application to multi-tenant buildings only. Under this arrangement, a property owner can apply to establish area allocations per tenant space, locations, and building sign construction type. Comprehensive sign plans may not be used to reallocate signage area to other building elevations beyond their maximum allowance or require specific fonts or text types. Transforming this process to optional gives the property owner more authority and flexibility to pursue the method to manage signage they feel is best as opposed to a mandatory process, which can be burdensome in some cases.

Miscellaneous Elements

The draft sign code also includes other miscellaneous updates from the existing sign code. A general summary of these updates would consist of:

- **Findings, Purposes, and Intent** – The draft sign code includes some modest updates to the findings and purpose statements.
- **Definitions** – Modifications, additions, and subtractions to the definitions section (see draft Sec. 21.304.07) have been completed. As a general rule, terms that were also defined within the broader definitions section (19.03) of the Zoning Code were removed from the sign code definitions, as this content is duplicative. Reference back to the general definitions was added to the sign code definitions sections.
- **Computations** – Some modest updates to the computations language (Sec. 21.304.08) and associated graphics have been completed. A new computation for lot frontage has been added, with an associated graphic. One additional change to this section was that graphics supporting comprehension of certain computations were inserted directly in this section, as opposed to being hosted in the graphic illustrations section at the end.
- **Nonconforming Signs** – Staff added a dedicated section to nonconforming signs. It is valuable to have a dedicated section for these situations, as there can be some confusion when simply applying standard nonconformity rules found elsewhere in the Zoning Code.
- **Sign Variance Process** – Staff is currently proposing to have a dedicated section (21.304.24) in the sign code for variances to sign standards. This approach is a departure from the existing code that points users or applicants back to Sec. 2.85.04 where the standard variance provisions are located. Having these elements located in the sign ordinance is likely an improvement or benefit to the user experience, and the findings written for sign variances are slightly different from the standard variance application. It is still possible that some of the content proposed in this new section could be migrated or deferred to Chapter 2 to remove some redundancies or improve organization.
- **Master Sign Plans** – The opportunity for unique or creative signage proposals for development located in the South Loop District through a Master Sign Plan is proposed to continue. Recognizing the South Loop District as the most significant entertainment area of Bloomington, staff still strongly believes there is value in retaining the master sign plan process as a means to create a more unique development and vibrancy. The draft sign code

references the master sign plan process and links to the procedural and content requirements that already exist in the Zoning Code (Sec. 21.501.06).

These miscellaneous elements hopefully will aid in effective and efficient administration of the draft sign code.

PUBLIC ENGAGEMENT

Direct Engagement

The City of Bloomington has directly engaged the following entities whom City staff determined have a direct interest in modifications to the sign ordinance: Minneapolis Regional Chamber of Commerce, Minnesota Shopping Center Association, Minnesota Retailers Association, the Minnesota chapter of the National Association of Industrial and Office Properties (also known as Commercial Real Estate Development Association), as well as multiple sign installers/companies and Bloomington property owners or their representatives whom have expressed interest in the project.

The draft ordinance has been reviewed by an extensive list of internal parties within the City of Bloomington who have an interest in the sign code. Internal parties whose responsibilities have connections to the sign code include Engineering/Traffic, Fire Prevention, Environmental Health, City Clerk, Parks & Recreation, Creative Placemaking, Police, and others. Staff leading the sign ordinance update will continue to engage with internal partners to ensure the sign code is responsive to their existing and future needs.

Online Engagement

The City has hosted a Let's Talk Bloomington page for the project since its launch in 2022. Through the use of this project page, staff has made various surveys, question and answer, and comment tools available. Documents relevant to the project, including the draft ordinance, have also been consistently posted to this site. An engagement report about this page is attached to the staff report summarizing traffic and participation on the project site.

Previous Engagement

For background, that previous engagement efforts during the earlier phase of the project included multiple surveys to better understand the existing landscape of signage in Bloomington and surrounding communities. First, a survey was hosted on the Let's Talk Bloomington page for the project and sent to all sign contractors/installers who obtained a sign permit in Bloomington (113 contacts) asking them about their experience using the existing sign code. Second, a survey intended to learn about other sign ordinances in the Twin Cities was sent to 30 municipalities. Both of these previous engagement efforts were helpful in shaping some of the policy decisions of the draft sign code, and both of these documents can be found in Case #PL2022-245 if of interest.

NEXT STEPS

Following the study sessions at the Planning Commission and City Council, staff will adjust the draft sign code as directed by these bodies. After completing these updates, staff will prepare the full ordinance document, correcting all of the numerous cross references to the sign code that exist throughout the full city code. While this process is under way, staff will continue to engage with all internal and external parties who have an interest in the signage regulations. Once staff is confident the ordinance is complete, public hearings can be scheduled for its consideration by the Planning Commission and City Council. This process would likely occur in January and February of 2024.

Legal Review

The draft sign code has been and will be reviewed thoroughly by the Bloomington Legal Department. In addition, staff is also seeking review the draft sign code from the City's contracted expert John Baker with Greene Espel PLLP. These reviews are important to ensure that the draft sign code provisions are sound and defensible in light of current signage and expression-based case law.

PLANNING COMMISSION REVIEW

The Planning Commission reviewed the draft sign code at a study session on November 16, 2023, where a number of questions were raised. No changes to the draft sign code were formally requested as part of the discussion. Following questions, the Planning Commission confirmed their support for scheduling public hearings early in 2024 based on the progression of the draft sign code. The Planning Commission encouraged staff to continue engaging with the public and collecting feedback on the proposed standards. The full detail of the Planning Commission discussion can be found in the attached draft minutes.

Following the study session with Planning Commission, staff made two small refinements to the draft sign code related to freestanding signage allowances along the highway and sign lighting when in proximity to residential sites. These changes are reflected in the version of the draft sign code attached to the November 27th Council agenda packet. These changes were not specifically requested by the Planning Commission, but rather reflect ongoing staff review of the document.

RECOMMENDATION

Staff is seeking detailed feedback and welcomes questions about the draft sign code attached to the staff report. In addition, staff is seeking consensus on whether or not the draft sign code is ready to proceed through the public hearing process. No formal recommendation or motion is necessary to solicit this information from the City Council. Staff will solicit feedback as part of our presentation.