

R5 I HOTEL USE APPROVAL CLARIFICATION – LDR TEXT AMENDMENT

AN ORDINANCE OF THE MAYOR AND CITY COMMISSION OF THE CITY OF MIAMI BEACH, FLORIDA, AMENDING THE MIAMI BEACH RESILIENCY CODE, BY AMENDING CHAPTER 7, ENTITLED “ZONING DISTRICTS AND REGULATIONS,” ARTICLE II, ENTITLED “DISTRICT REGULATIONS,” BY AMENDING SECTION 7.2.4, ENTITLED “RM-1 RESIDENTIAL MULTIFAMILY LOW INTENSITY,” AT SUBSECTION 7.2.4.2, ENTITLED “USES (RM-1),” AND BY AMENDING SECTION 7.2.5, ENTITLED “RM-2 RESIDENTIAL MULTIFAMILY, MEDIUM INTENSITY,” AT SUBSECTION 7.2.5.2, ENTITLED “USES (RM-2),” AND BY AMENDING SECTION 7.2.6, ENTITLED “RM-3 RESIDENTIAL MULTIFAMILY, HIGH INTENSITY,” AT SUBSECTION 7.2.6.2, ENTITLED “USES (RM-3),” AND BY AMENDING SECTION 7.2.10, ENTITLED “CD-1 COMMERCIAL, LOW INTENSITY DISTRICT,” AT SUBSECTION 7.2.10.2, ENTITLED “USES (CD-1),” AND BY AMENDING SECTION 7.2.11, ENTITLED “CD-2 COMMERCIAL, MEDIUM INTENSITY DISTRICT,” AT SUBSECTION 7.2.11.2, ENTITLED “USES (CD-2),” AND BY AMENDING SECTION 7.2.12, ENTITLED “CD-3 COMMERCIAL, HIGH INTENSITY DISTRICT,” AT SUBSECTION 7.2.12.2, ENTITLED “USES (CD-3),” AND BY AMENDING SECTION 7.2.13, ENTITLED “MIXED USE ENTERTAINMENT DISTRICT,” AT SUBSECTION 7.2.13.2, ENTITLED “USES (MXE),” AND BY AMENDING SECTION 7.2.14, ENTITLED “NORTH BEACH TOWN CENTER-CORE DISTRICT (TC),” AT SUBSECTION 7.2.14.2, ENTITLED “USES (TC-1, TC-2),” AND BY AMENDING SUBSECTION 7.2.14.3, ENTITLED “USES (TC-3),” AND BY AMENDING SUBSECTION 7.2.14.6, ENTITLED “TOWN CENTER-CENTRAL CORE (TC-C) DISTRICT,” AND BY AMENDING SECTION 7.2.15, ENTITLED “PERFORMANCE STANDARD DISTRICT (PS),” AT SUBSECTION 7.2.15.2, ENTITLED “RESIDENTIAL PERFORMANCE STANDARDS DISTRICTS (R-PS),” AND BY AMENDING SUBSECTION 7.2.15.3, ENTITLED “COMMERCIAL PERFORMANCE STANDARDS DISTRICTS (C-PS),” BY REFERENCING THE HOTEL APPROVAL PROCESS ESTABLISHED UNDER SECTION 2.7.2, AND CONFORMING THE REGULATIONS FOR EACH RESPECTIVE ZONING DISTRICT TO REFLECT THAT THE APPROVAL OF A WARRANT BY THE CITY COMMISSION SHALL BE REQUIRED PRIOR TO THE REVIEW OF A LAND USE BOARD APPLICATION OR BUILDING PERMIT FOR A HOTEL, SUITE HOTEL, APARTMENT HOTEL, OR HOSTEL, SUBJECT TO EXCEPTIONS, AND SUBJECT TO THE PROCEDURAL REQUIREMENTS AND REVIEW CRITERIA IN SECTION 2.7.2; AND PROVIDING FOR CODIFICATION, REPEALER, SEVERABILITY, APPLICABILITY; AND AN EFFECTIVE DATE.

Applicable Area:

# MIAMI BEACH

## COMMISSION MEMORANDUM

TO: Honorable Mayor and Members of the City Commission

FROM: Eric Carpenter, City Manager

DATE: April 23, 2025 9:40 a.m. Second Reading Public Hearing

TITLE: HOTEL USE APPROVAL CLARIFICATION – LDR TEXT AMENDMENT  
AN ORDINANCE OF THE MAYOR AND CITY COMMISSION OF THE CITY OF MIAMI BEACH, FLORIDA, AMENDING THE MIAMI BEACH RESILIENCY CODE, BY AMENDING CHAPTER 7, ENTITLED “ZONING DISTRICTS AND REGULATIONS,” ARTICLE II, ENTITLED “DISTRICT REGULATIONS,” BY AMENDING SECTION 7.2.4, ENTITLED “RM-1 RESIDENTIAL MULTIFAMILY LOW INTENSITY,” AT SUBSECTION 7.2.4.2, ENTITLED “USES (RM-1),” AND BY AMENDING SECTION 7.2.5, ENTITLED “RM-2 RESIDENTIAL MULTIFAMILY, MEDIUM INTENSITY,” AT SUBSECTION 7.2.5.2, ENTITLED “USES (RM-2),” AND BY AMENDING SECTION 7.2.6, ENTITLED “RM-3 RESIDENTIAL MULTIFAMILY, HIGH INTENSITY,” AT SUBSECTION 7.2.6.2, ENTITLED “USES (RM-3),” AND BY AMENDING SECTION 7.2.10, ENTITLED “CD-1 COMMERCIAL, LOW INTENSITY DISTRICT,” AT SUBSECTION 7.2.10.2, ENTITLED “USES (CD-1),” AND BY AMENDING SECTION 7.2.11, ENTITLED “CD-2 COMMERCIAL, MEDIUM INTENSITY DISTRICT,” AT SUBSECTION 7.2.11.2, ENTITLED “USES (CD-2),” AND BY AMENDING SECTION 7.2.12, ENTITLED “CD-3 COMMERCIAL, HIGH INTENSITY DISTRICT,” AT SUBSECTION 7.2.12.2, ENTITLED “USES (CD-3),” AND BY AMENDING SECTION 7.2.13, ENTITLED “MIXED USE ENTERTAINMENT DISTRICT,” AT SUBSECTION 7.2.13.2, ENTITLED “USES (MXE),” AND BY AMENDING SECTION 7.2.14, ENTITLED “NORTH BEACH TOWN CENTER-CORE DISTRICT (TC),” AT SUBSECTION 7.2.14.2, ENTITLED “USES (TC-1, TC-2),” AND BY AMENDING SUBSECTION 7.2.14.3, ENTITLED “USES (TC-3),” AND BY AMENDING SUBSECTION 7.2.14.6, ENTITLED “TOWN CENTER-CENTRAL CORE (TC-C) DISTRICT,” AND BY AMENDING SECTION 7.2.15, ENTITLED “PERFORMANCE STANDARD DISTRICT (PS),” AT SUBSECTION 7.2.15.2, ENTITLED “RESIDENTIAL PERFORMANCE STANDARDS DISTRICTS (R-PS),” AND BY AMENDING SUBSECTION 7.2.15.3, ENTITLED “COMMERCIAL PERFORMANCE STANDARDS DISTRICTS (C-PS),” BY REFERENCING THE HOTEL APPROVAL PROCESS ESTABLISHED UNDER SECTION 2.7.2, AND CONFORMING THE REGULATIONS FOR EACH RESPECTIVE ZONING DISTRICT TO REFLECT THAT THE APPROVAL OF A WARRANT BY THE CITY COMMISSION SHALL BE REQUIRED PRIOR TO THE REVIEW OF A LAND USE BOARD APPLICATION OR BUILDING PERMIT FOR A HOTEL, SUITE HOTEL, APARTMENT HOTEL, OR HOSTEL, SUBJECT TO EXCEPTIONS, AND SUBJECT TO THE PROCEDURAL REQUIREMENTS AND REVIEW CRITERIA IN SECTION 2.7.2; AND PROVIDING FOR CODIFICATION, REPEALER, SEVERABILITY, APPLICABILITY; AND AN EFFECTIVE DATE.

### **RECOMMENDATION**

The Administration recommends that the Mayor and City Commission (City Commission) adopt the ordinance.

### **BACKGROUND/HISTORY**

On December 11, 2024, the City Commission approved an ordinance at First Reading establishing a commission approval process for future hotel uses. As part of this approval at First Reading, the City Commission also referred a separate ordinance to the Planning Board, to clarify the zoning districts for which the hotel approval process will apply. The hotel approval process ordinance was adopted by the City Commission at Second Reading on February 3, 2025.

## **ANALYSIS**

The subject ordinance is a companion amendment to the hotel approval process ordinance adopted by the City Commission and amends each zoning district where apartment hotels, hotels, suite hotels, and hostels may be permitted, by referencing the warrant process established under section 2.7.2 of the Land Development Regulations of the City Code (LDRs). The approval of a warrant by the City Commission is now required prior to the review of a land use board application or building permit for a hotel, suite hotel, apartment hotel, or hostel, subject to exceptions, and subject to the procedural requirements and review criteria in section 2.7.2.

In addition to clarifying the zoning districts where hotel approval is required under the warrant process, the Administration also recommends that a fee schedule be established for future commission warrant applications. While such fee schedule is ministerial, it does require a text amendment to the LDRs. As part of the approval of the proposed ordinance at First Reading, the Administration recommends that a separate ordinance be referred to the Planning Board to establish a corresponding fee schedule.

## **PLANNING BOARD REVIEW**

On February 4, 2025, the Planning Board held a public hearing and transmitted the proposed ordinance to the City Commission with a favorable recommendation (6-0).

## **UPDATE**

The subject ordinance was approved at First Reading on February 26, 2025, subject to the following additional exception provisions being added:

*This Ordinance shall not apply to the following properties:*

- 1. Properties fronting Washington Avenue that have an active land use board application with a hearing file number and where a notice to proceed to public hearing has been issued by the City prior to July 1, 2024.*
- 2. Properties fronting the west side of Collins Avenue between 77 Street and 79 Street that have applied for a joint pre-application meeting with Transportation Staff and Planning Department Staff before November 26, 2024.*
- 3. Properties fronting the west side of Collins Avenue between 13th Street and 14th Street, with a contributing building with less than 50 residential units, if the contributing structure was originally constructed as a hotel and then later converted to residential apartments.*

The attached ordinance for Second Reading has been modified to include these additional exception provisions.

## **FISCAL IMPACT STATEMENT**

No Fiscal Impact Expected

**Does this Ordinance require a Business Impact Estimate?** Yes  
(FOR ORDINANCES ONLY)

If applicable, the Business Impact Estimate (BIE) was published on: 3/18/2025  
See BIE at: <https://www.miamibeachfl.gov/city-hall/city-clerk/meeting-notices/>

**FINANCIAL INFORMATION**

Not Applicable

**CONCLUSION**

The Administration recommends that the City Commission adopt the ordinance.

**Applicable Area**

Citywide

**Is this a "Residents Right to Know" item,  
pursuant to City Code Section 2-17?**

Yes

**Is this item related to a G.O. Bond  
Project?**

No

**Was this Agenda Item initially requested by a lobbyist which, as defined in Code Sec. 2-481,  
includes a principal engaged in lobbying?** No

If so, specify the name of lobbyist(s) and principal(s):

**Department**

Planning

**Sponsor(s)**

Commissioner Joseph Magazine

**Co-sponsor(s)**

**Condensed Title**

9:40 a.m. 2nd Rdg, Hotel Use Approval Clarification-LDR Text Amendment. (JM) PL 5/7

**Previous Action (For City Clerk Use Only)**

First Reading Public Hearing on 2/26/2025 - R5 D

Hotel Use Approval Clarification – LDR Text Amendment  
(Amended for Second Reading)

AN ORDINANCE OF THE MAYOR AND CITY COMMISSION OF THE CITY OF MIAMI BEACH, FLORIDA, AMENDING THE MIAMI BEACH RESILIENCY CODE, BY AMENDING CHAPTER 7, ENTITLED "ZONING DISTRICTS AND REGULATIONS," ARTICLE II, ENTITLED "DISTRICT REGULATIONS," BY AMENDING SECTION 7.2.4, ENTITLED "RM-1 RESIDENTIAL MULTIFAMILY LOW INTENSITY," AT SUBSECTION 7.2.4.2, ENTITLED "USES (RM-1)," AND BY AMENDING SECTION 7.2.5, ENTITLED "RM-2 RESIDENTIAL MULTIFAMILY, MEDIUM INTENSITY," AT SUBSECTION 7.2.5.2, ENTITLED "USES (RM-2)," AND BY AMENDING SECTION 7.2.6, ENTITLED "RM-3 RESIDENTIAL MULTIFAMILY, HIGH INTENSITY," AT SUBSECTION 7.2.6.2, ENTITLED "USES (RM-3)," AND BY AMENDING SECTION 7.2.10, ENTITLED "CD-1 COMMERCIAL, LOW INTENSITY DISTRICT," AT SUBSECTION 7.2.10.2, ENTITLED "USES (CD-1)," AND BY AMENDING SECTION 7.2.11, ENTITLED "CD-2 COMMERCIAL, MEDIUM INTENSITY DISTRICT," AT SUBSECTION 7.2.11.2, ENTITLED "USES (CD-2)," AND BY AMENDING SECTION 7.2.12, ENTITLED "CD-3 COMMERCIAL, HIGH INTENSITY DISTRICT," AT SUBSECTION 7.2.12.2, ENTITLED "USES (CD-3)," AND BY AMENDING SECTION 7.2.13, ENTITLED "MIXED USE ENTERTAINMENT DISTRICT," AT SUBSECTION 7.2.13.2, ENTITLED "USES (MXE)," AND BY AMENDING SECTION 7.2.14, ENTITLED "NORTH BEACH TOWN CENTER-CORE DISTRICT (TC)," AT SUBSECTION 7.2.14.2, ENTITLED "USES (TC-1, TC-2)," AND BY AMENDING SUBSECTION 7.2.14.3, ENTITLED "USES (TC-3)," AND BY AMENDING SUBSECTION 7.2.14.6, ENTITLED "TOWN CENTER-CENTRAL CORE (TC-C) DISTRICT," AND BY AMENDING SECTION 7.2.15, ENTITLED "PERFORMANCE STANDARD DISTRICT (PS)," AT SUBSECTION 7.2.15.2, ENTITLED "RESIDENTIAL PERFORMANCE STANDARDS DISTRICTS (R-PS)," AND BY AMENDING SUBSECTION 7.2.15.3, ENTITLED "COMMERCIAL PERFORMANCE STANDARDS DISTRICTS (C-PS)," BY REFERENCING THE HOTEL APPROVAL PROCESS ESTABLISHED UNDER SECTION 2.7.2, AND CONFORMING THE REGULATIONS FOR EACH RESPECTIVE ZONING DISTRICT TO REFLECT THAT THE APPROVAL OF A WARRANT BY THE CITY COMMISSION SHALL BE REQUIRED PRIOR TO THE REVIEW OF A LAND USE BOARD APPLICATION OR BUILDING PERMIT FOR A HOTEL, SUITE HOTEL, APARTMENT HOTEL, OR HOSTEL, SUBJECT TO EXCEPTIONS, AND SUBJECT TO THE PROCEDURAL REQUIREMENTS AND REVIEW CRITERIA IN SECTION 2.7.2; AND PROVIDING FOR CODIFICATION, REPEALER, SEVERABILITY, APPLICABILITY; AND AN EFFECTIVE DATE.

**WHEREAS**, on February 3, 2025, the City Commission adopted an Ordinance creating a warrant process for the review of all future apartment hotels, hotels, suite hotels, and hostels in districts where such uses are permitted, as provided in section 2.7.2 of the Resiliency Code; and

**WHEREAS**, this Ordinance is a companion amendment to the Ordinance creating the warrant process; and

**WHEREAS**, this Ordinance amends each zoning district where apartment hotels, hotels, suite hotels, and hostels may be permitted, by referencing the approval process established under section 2.7.2; and

**WHEREAS**, the amendments set forth below are necessary to accomplish all of the above objectives.

**NOW THEREFORE, BE IT ORDAINED BY THE MAYOR AND CITY COMMISSION OF THE CITY OF MIAMI BEACH, FLORIDA.**

**SECTION 1.** Chapter 7 of the Resiliency Code, entitled "Zoning Districts and Regulations," is hereby amended as follows:

**CHAPTER 7**  
**ZONING DISTRICTS AND REGULATIONS**  
\* \* \*

**ARTICLE II: DISTRICT REGULATIONS**

\* \* \*

**7.2.4 RM-1 RESIDENTIAL MULTIFAMILY LOW INTENSITY**  
\* \* \*

**7.2.4.2 USES (RM-1)**  
\* \* \*

- a. **Supplemental Main Permitted Uses Regulations (RM-1)**  
The supplemental main permitted uses are as follows:

1. Apartment hotels, hotels, and suite hotels for properties fronting Harding Avenue or Collins Avenue, from the city line on the north, to 73rd Street on the south (MAP EXHIBIT-1) (pursuant to sections 2.7.2, which requires a Commission warrant, and 7.5.4.5)
- \* \* \*

**7.2.5 RM-2 RESIDENTIAL MULTIFAMILY, MEDIUM INTENSITY**  
\* \* \*

**7.2.5.2 Uses (RM-2)**  
\* \* \*

- a. **Supplemental Main Permitted Uses Regulations (RM-2)**  
The supplemental main permitted uses are as follows:

1. Apartment hotels, hotels, hostels, and suite hotels (pursuant to sections 2.7.2, which requires a Commission warrant, and 7.5.4.5).
- \* \* \*

**7.2.6 RM-3 RESIDENTIAL MULTIFAMILY, HIGH INTENSITY**  
\* \* \*

#### 7.2.6.2 Uses (RM-3)

\* \* \*

##### a. Supplemental Main Permitted Uses Regulations (RM-3)

The supplemental main permitted uses are as follows:

1. hotels, hostels, and suite hotels (pursuant to sections 2.7.2, which requires a Commission warrant, and 7.5.4.5).

\* \* \*

#### 7.2.11 CD-2 COMMERCIAL, MEDIUM INTENSITY DISTRICT

\* \* \*

##### 7.2.11.2 Uses (CD-2)

\* \* \*

##### a. Supplemental Main Permitted Uses Regulations (CD-2)

The supplemental main permitted uses are as follows:

1. Apartment hotels, hotels, hostels, and suite hotels (pursuant to sections 2.7.2, which requires a Commission warrant, and 7.5.4.5).

\* \* \*

#### 7.2.12 CD-3 COMMERCIAL, HIGH INTENSITY DISTRICT

\* \* \*

##### 7.2.12.2 Uses (CD-3)

\* \* \*

##### a. Supplemental Main Permitted Uses Regulations (CD-3)

The supplemental main permitted uses are as follows:

1. Apartment hotels, hotels, hostels, and suite hotels (pursuant to sections 2.7.2, which requires a Commission warrant, and 7.5.4.5).

\* \* \*

#### 7.2.13 MXE MIXED USE ENTERTAINMENT DISTRICT

\* \* \*

##### 7.2.13.2 Uses (MXE)

\* \* \*

##### a. Supplemental main permitted uses Regulations (MXE)

The supplemental main permitted uses are as follows:

1. Apartments; apartment hotels, hotels, hostels, and suite hotels (pursuant to sections 2.7.2, which requires a Commission warrant, and 7.5.4.5).

\* \* \*

#### 7.2.14 NORTH BEACH TOWN CENTER-CORE DISTRICT (TC)

\* \* \*

##### 7.2.14.2 Uses (TC-1, TC-2)

#### USES TABLE (TC-1, TC-2)

##### RESIDENTIAL

Apartments

P\* P



\* \* \*

a. **Supplemental Main Permitted Uses Regulations (TC-1, TC-2)**

The supplemental main permitted uses are as follows:

1. Alcoholic beverage establishments pursuant to the regulations set forth in chapter 6;
2. The ground story frontage along 71st Street and Collins Avenue shall be governed by section 7.2.14.4. The provisions of chapter 6 concerning distance separation for consumption of alcoholic beverages on premises in restaurants shall not apply to this district.
3. Kennels are only allowed in the TC-1 District.
4. Apartment hotels and hotels (pursuant to sections 2.7.2, which requires a Commission warrant, and 7.5.4.5).

\* \* \*

**7.2.14.3 Uses (TC-3)**

b. **Supplemental Conditional Uses Regulations (TC-3)**

The supplemental main permitted uses are as follows:

1. Apartment hotels, hotel, and suite hotel (pursuant to sections 2.7.2, which requires a Commission warrant, and 7.5.4.5).

\* \* \*

**7.2.14.6 TOWN CENTER-CENTRAL CORE (TC-C) DISTRICT**

b. **Uses (TC-C)**

2. **Supplemental Use Regulations (TC-C)**

A. The following supplemental regulations shall apply to specific uses in the TC-C district:

- i. There shall be no variances regarding the regulations for permitted, prohibited, accessory, exception, special exception, and conditional uses in section 7.2.14.6.b.1; and the supplemental regulations of such uses in section 7.2.14.6.b.2.
- ii. Apartment hotels, and hotels (pursuant to sections 2.7.2, which requires a Commission warrant, and 7.5.4.5).

\* \* \*

**7.2.15 PERFORMANCE STANDARD DISTRICT (PS)**

**7.2.15.2 Residential Performance Standards Districts (R-PS)**

b. **Uses**

USES TABLE (R-PS)		
	R-PS 1, 2	R-PS 3, 4



USES TABLE (R-PS)		
RESIDENTIAL		
Single-family	P	P
Townhome	P	P
Apartment	P	P
LODGING		
Apartment hotel pursuant to sections <u>2.7.2, which requires a Commission warrant, and 7.5.4.5</u>	Pro	P
Hotel pursuant to sections <u>2.7.2, which requires a Commission warrant, and 7.5.4.5</u>	Pro	P
Suite hotels pursuant to sections <u>2.7.2, which requires a Commission warrant, and 7.5.4.5</u>	Pro	P
Hostel pursuant to sections <u>2.7.2, which requires a Commission warrant, and 7.5.4.5</u>	Pro	Pro

\* \* \*

**7.2.15.3 Commercial Performance Standards Districts (C-PS)**

\* \* \*

b. **Uses**

\* \* \*

USES TABLE (C-PS)	
	C-PS 1, 2, 3, 4
RESIDENTIAL	
Single-family	P
Townhome	P
Apartment	P
LODGING	
Apartment hotel pursuant to sections <u>2.7.2, which requires a Commission warrant, and 7.5.4.5</u>	P
Hotel pursuant to sections <u>2.7.2, which requires a Commission warrant, and 7.5.4.5</u>	P

USES TABLE (C-PS)	
Suite hotels pursuant to sections <u>2.7.2, which requires a Commission warrant, and 7.5.4.5</u>	P
Hostel pursuant to sections <u>2.7.2, which requires a Commission warrant, and 7.5.4.5</u>	Pro in C-PS1 and C-PS2 P in C-PS3 and C-PS4

\* \* \*

**SECTION 2. REPEALER.**

All ordinances or parts of ordinances and all section and parts of sections in conflict herewith be and the same are hereby repealed.

**SECTION 3. CODIFICATION.**

It is the intention of the City Commission, and it is hereby ordained that the provisions of this ordinance shall become and be made part of the Code of the City of Miami Beach as amended; that the sections of this ordinance may be renumbered or relettered to accomplish such intention; and that the word "ordinance" may be changed to "section" or other appropriate word.

**SECTION 4. SEVERABILITY.**

If any section, subsection, clause or provision of this Ordinance is held invalid, the remainder shall not be affected by such invalidity.

**SECTION 5. APPLICABILITY.**

This Ordinance shall not apply to the following properties:

- a. Properties fronting Washington Avenue that have an active land use board application with a hearing file number and where a notice to proceed to public hearing has been issued by the City prior to July 1, 2024.
- b. Properties fronting the west side of Collins Avenue between 77 Street and 79 Street for which a property owner applied for a joint pre-application meeting with Transportation Staff and Planning Department Staff before November 26, 2024.
- c. Properties fronting the west side of Collins Avenue between 13th Street and 14th Street, with a contributing building with less than 50 residential units, if the contributing structure was originally constructed as a hotel and then later converted to residential apartments.

**SECTION 6. EFFECTIVE DATE.**

This Ordinance shall take effect ten days following adoption.

**PASSED** and **ADOPTED** this \_\_\_\_\_ day of \_\_\_\_\_, 2025.

**ATTEST:**

\_\_\_\_\_  
Rafael E. Granado, City Clerk

\_\_\_\_\_  
Steven Meiner, Mayor

First Reading: February 26, 2025  
Second Reading: April 23, 2025

APPROVED AS TO  
FORM AND LANGUAGE  
& FOR EXECUTION

Verified By: \_\_\_\_\_  
Thomas R. Mooney, AICP  
Planning Director

\_\_\_\_\_  
City Attorney NK  
Date 4/15/2025