



PLAN SNAPSHOT REPORT DSIAPP-000338-2026 FOR CITY OF SAINT PAUL

Plan Type: DSI Appeals

Work Class: City Council

Description: An appeal of a appeal of a decision by the Board of Zoning Appeals denying two variances from the design standards of City Council Resolution 23-1442 for a development project at United Village Block D, where new commercial buildings facing arterial streets such as University Avenue are required to provide window and door openings comprising at least 50% of the ground-floor façade length and 30% of the ground-floor façade area, and the proposed hotel's north façade includes 43.1% of the façade length and 23.3% of the façade area as window and door openings, for variances of 6.9% and 6.7%

Parcel:	Address: 1560 University Ave West St. Paul,	Main	Zone: T4
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Appellant: Carolyn Wolf

Plan Custom Fields

Code Citation(s) See attached narrative

Grounds for Appeal The Board of Zoning Appeals failed to act on the variance application. The denial was therefore technical and no specific issues cited. We believe the BZA erred and failed to act on the staff's recommendation to approve.

Zoning Variance Application United Village Block D (Hotel)

The following variances are requested for the Hotel & Parking Structure on Block D as part of United Village Phase 1 Development. Block D is now legally described as Lot 1, Block 2, United Village Development, Ramsey County, Minnesota.

Zoning Provision for which Variances are requested:

By RES 16-239 and as amended by RES 23-1442, the City Council approved the Snelling-Midway Redevelopment Site Master Plan and Design Guidelines. Snelling-Midway Redevelopment, LLC (SMR) respectfully requests the following variances to Condition 3 that provides as follows

3. All new buildings within the master plan boundary must have a primary pedestrian building entrance on arterial, collector, and/or local streets. All new commercial and civic buildings shall have window and door openings that comprise at least 50 percent of the length and at least 30 percent of the area around the ground floor along arterial, collector, and/or local street facades.

Two variances are requested to these requirements for north façade of the Hotel on Block D:

- North façade 50% of length of ground floor window and door openings required; 43.1% proposed in current design for a variance of 7%.
- North façade 30% of the area of ground floor window and door openings required; 23.3% proposed in the current design for a variance of 7%.

Project Narrative

Snelling-Midway Master Plan Summary

The 2016 Master Plan contemplated the transformation of the Snelling-Midway Super Block (bounded by University Avenue, Snelling Avenue, Pascal Avenue and St. Anthony Avenue) consisting of 34.4 acres (the "Super Block"). The conditions of the Superblock to be addressed in the transformation included demolition of the Metro Transit repair and storage facility on 10 acres in the southwest corner and an outdated Midway Shopping Center comprised of single story retail stores constructed in the mid-1950s north of the Metro Transit facility and to address the environmental contamination on the Super Block, including from the Metro Transit facility. The vision was to create an integrated modern village with sports, entertainment, office, retail, housing, and hotel amenities. Allianz Field, home of the MLS Professional Soccer team Minnesota United FC, was completed in 2019 and was the first and keynote improvement on the Super Block. Allianz Field garnered national and international recognition for its sport stadium design. The stadium and the surrounding area are situated within the southern 40% of the Super Block.

United Village Phase 1

Given the economic conditions and other developments since Allianz Field was completed in 2019, including the COVID-19 pandemic and the fire that destroyed major portions of the Midway Shopping Center, a phased development approach is necessary to build out the balance of the Super Block. The elements in United Village Phase 1 were carefully selected to provide the foundation for further development, to meet the local needs of the community, particularly the desire of multiple local colleges and universities for a conveniently located hotel, and to demonstrate the developer's commitment to open space and community-oriented improvements. In addition to the two privately-owned public spaces (POPS), the sculpture plaza displaying The Calling of a loon in Block A-1 and the all-abilities playground in the westerly side of Block G, both of which have already been completed and enjoyed by the public since 2024, There are three vertical developments, the hotel with parking ramp that is the subject of this Variance request, the two adjacent pavilion restaurants on Block F-1 and the Office Building with adjacent parking on Block B. In addition, additional infrastructure for the Super Block will be added in conjunction with the vertical improvements. Please refer to the attached Block Diagram for United Village Phase 1.

Block D – Hotel and Parking Ramp

Snelling-Midway Redevelopment, LLC (SMR) and its development team, including Populous, Loucks and Tegra, submit this narrative along with the referenced drawings to outline the design intent and use of the hotel and adjacent above grade parking structure on Block D. The parcel is enclosed by Asbury Street to the west, Spruce Tree Avenue to the south, University Avenue to the north, and Simpson Street to the east as shown in the attached Block Diagram of United Village Phase 1.

The footprint of Block D-Hotel and adjoining parking ramp is approximately 37,000 SF, the total available parcel size is 71,874 square feet. The remaining area of the block will incorporate an eight-foot expansion to the University Avenue pedestrian sidewalk creating an overall walkway/boulevard of almost nineteen (19) feet wide. A seven (7) foot wide pedestrian sidewalk will be located along the northern front facade of the hotel. The two sidewalks will provide a twenty-five (25) foot east-west pedestrian corridor through the site.

The valet/drop off drive that runs parallel with University Avenue and does not include any surface parking; it is utilized strictly for short term valet or drop-off of hotel guests. The parking ramp will have dedicated parking for hotel guests to check in if they are not utilizing valet or being dropped off by shared transportation. The primary hotel entrance is situated at midblock on principal axis with the Allianz Field beyond defining the super block, while providing centralized services to the hotel reception, elevators and variety of other amenities supporting guest experience and operations.

A large accessible patio terrace and open lawn (approximately 15,500 square feet) is located at the south side of the hotel. The patio will serve as outdoor seating for the lounge/restaurant and hotel guests, and the open lawn area will be open to the public. Wrapping the perimeter of the development will be a minimum fifteen (15) foot wide pedestrian public sidewalk on Asbury Street, Spruce Tree Avenue, and Simpson Street.

The hotel building is primarily divided into two volumes, with a shared podium condition at the ground floor unifying the massing composition. Building volumes include the hotel block on the west of the parcel, and 2-bay parking ramp on the east. The design includes a total of 8 levels for the hotel block (including ground level) and 5 levels for the parking ramp including ground level, with an additional parking mezzanine level. All hotel rooms feature views either north to the Midway or south to the Great Lawn and Alliance Field.

The hotel contains retail space, guest rooms and amenities, a restaurant, parking ramp, and back-of-house and service program placed along primary streets – totaling approximately 229,200 gross square feet across all levels. Hotel specific program at the street level includes a central lobby entrance situated along the north elevation which leads guests into an open lobby plan consisting of lounge, restaurant, entrance, and social areas to activate the street. Meeting and Patron Amenity rooms are located along the north elevation while the south is devoted to an internal/external patio with views of Allianz Field and the Great Lawn. The second level of the hotel block is programmed to include certain amenities: fitness center, meeting rooms, and back-of-house support spaces. Typical hotel room floors provide a total of 29 keys. There are two egress stairs that run throughout the hotel. A back-of-house service elevator is in addition to centrally located two (2) passenger elevators. The top level of the hotel block envisions a penthouse condition, with twelve (12) large 'studio' hotel rooms that can be utilized for long-term stay opportunities. The total room count for the hotel is 158 keys.

The street level of the parking ramp includes vehicular access from Simpson Street for entry to the car park and for loading access. The loading dock and trash rooms service hotel back-of-house space. The street facing retail spaces total approximately 5,000 SF. The design intent for the retail spaces on the first floor is smaller, preferably local businesses that provide complementary goods and/or services to the Midway Community. There is also a Community Room within the ground level (south side) of the parking ramp to host local events for the surrounding neighborhoods.

The parking ramp contains approximately 290 stalls, distributed to serve hotel guests as well as retail tenants, while one-third of the parking will be available for event or visitor parking dependent upon event attendance and/or destination. The southeast corner of the ramp serves as a corner entrance expressing vertical circulation core serving all ramp levels, a second core is situated along the northwest corner of the parking ramp directly tied to hotel lobby and guest access. The typical two bay parking layout within the parking ramp contains approximately 64 stalls per level with distributed accessible stalls. The upper level of parking is open to the sky above.

Exterior Façade Materials

The 15' high hotel podium facade is composed of precast architectural concrete panels with color, brick veneer, and accent tile at the main north and south entrances. The hotel guest room tower is clad in white architectural precast panels with punched operable glazed openings. Glazing will be insulated units with performance coating. Located approximately 15' above the street façade, the hotel amenity deck at level 2, is clad in decorative masonry and glass windows and sets back to reveal primarily hotel amenity spaces and terraces. The five (5) levels of hotel rooms are situated above and ultimately capped by the hotel suites and the roof eave.

The parking ramp facade at street level is a continuation of the hotel façade. The upper levels of the parking ramp will be semi-enclosed with architectural fabric mesh panels which disguise moving-parked vehicles while allowing proper passive ventilation. It is envisioned that the west wall of the parking ramp is prepped and reserved for a large-scale mural flanking the hotel as a backdrop to the hotel's south green space which serves civic events and experiences.

The façade (material and fenestration patterns) for both the hotel and parking ramp along all four street(s) employ consistent unifying materials, proportions and design features lining the base to unify both volumes. Active uses (community-retail tenants) line the street where it is possible to enhance the pedestrian experience, predominantly along the north and south elevations. The façade will also include additional treatments to accentuate the color, brand, and wayfinding for the hotel, such as plantings, street furnishings, signage, canopies, lighting, and architectural detail which effectively translate to human scale and environs. Note that signage and wayfinding will be submitted in a separate application later.

Variance #1: Ground Floor Window and Door Openings (North Elevation).

City Council RES 16-239 and as amended by RES 23-1442 - window and door openings at ground floor shall comprise at least 50% of the length and at least 30% of the area around the ground floor along arterial, collector, and/or local street facades.

- North façade 50% of length of ground floor window and door openings required; 43.1% proposed for a variance of 7%.
- North façade 30% of the area of ground floor window and door openings required; 23.3% proposed for a variance of 7%.

SUPPORTING INFORMATION: Explain or demonstrate the following. Attach additional sheets if necessary.

1. The variance is in harmony with the general purposes and intent of the zoning code.
 - A. This variance is consistent with the overall purpose and intent of the code, as the proposed window and door openings provide meaningful visual connections from the pedestrian realm into active interior public spaces, including the retail area, guest amenity spaces (e.g. library and wine rooms), and the main hotel lobby. The exterior design avoids placing windows at the NW and NE restrooms and back of house spaces along this façade.
 - B. Refer to Sheet A-1 for first floor plan layout.
2. The variance is consistent with the comprehensive plan.
 - A. The variance is consistent with the intent of the T4 Traditional Neighborhood District, as the project provides a pedestrian-oriented, mixed-use development within a transit-supportive neighborhood. Because the hotel and parking ramp occupy an entire city block and are bordered by streets on all four sides, some back-of-house functions must be located along portions of the exterior perimeter. Even so, as illustrated on the attached exterior elevations, each façade incorporates a thoughtful composition of brick, precast, windows, and openings that maintains a meaningful pedestrian connection. In addition, strategically placed art murals along the north, west, and south elevations reinforce this interaction. Together, these architectural elements and public art features enhance the pedestrian experience and contribute to an active, engaging streetscape
 - B. Refer to exterior elevations of hotel and parking ramp on Sheets A13 – A15.
3. Practical difficulties in complying with the provision of the code from which a variance is requested, and that the property would be used in a reasonable manner not permitted by the provision. Economic considerations alone do not constitute practical difficulties.
 - A. For the north elevation of the hotel, the window and door openings comprise approximately 43.1% of the total length and 23.3% of the area of the ground floor. The floor plan layout along the north portion of this floor level is a combination of hotel guest areas more centrally located around the main lobby along with amenity / support spaces of the hotel. This is consistent with the typical circulation and operation of the hotel. The addition of more openings would not provide any visual connection to the public areas of the hotel and thus conflict with the intent of the zoning requirement.
 - B. From a design aesthetic perspective, the locations of the hotel and parking ramp first-floor openings create a balanced, symmetrical pattern within each of the two building forms that are then unified by a consistent exterior material palette across the entire façade. Any additional

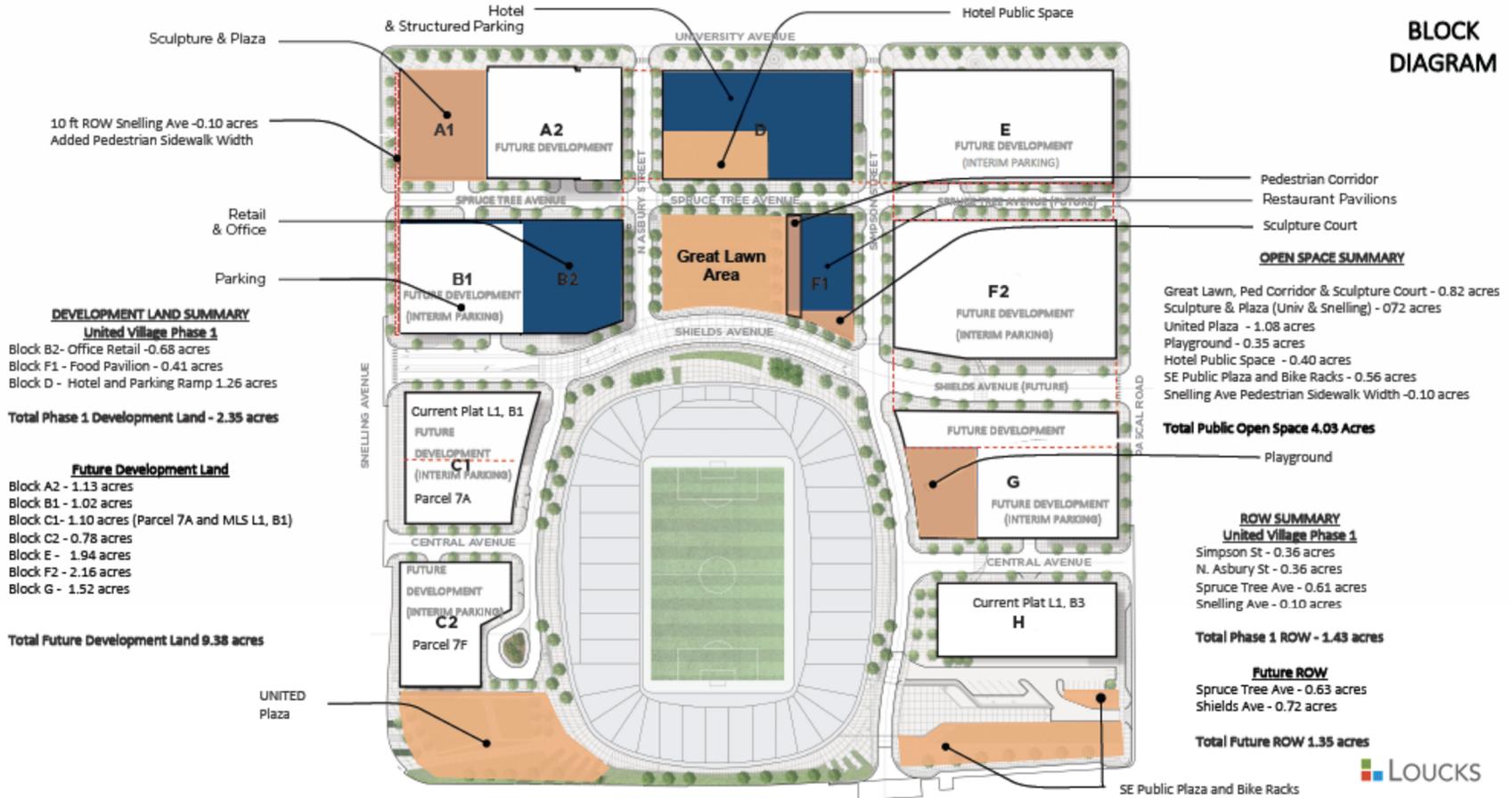
glazing in this area would occur within back-of-house spaces such as restrooms and storage rooms and therefore would not contribute to the type of active street-facing connection intended by the zoning code. As an acceptable alternative approach, a ground-level mural on the wall of the restrooms adjacent to the retail shops featuring the phrase “where all Minnesotans come to dance – WAMD Radio 1923”, references the historic local significance of this site and further strengthens the visual engagement along this public way. Refer to Sheet A-14. Finally, as noted in 6.C below, the stairway serving the parking ramp is behind the mural that will also provide a visual transition from the hotel to the parking ramp and provides a much more aesthetically pleasing activation feature than glazing looking into the stairway.

- C. Refer to Sheet A-12 for “opening” calculations for this elevation.
4. The plight of the landowner is due to circumstances unique to the property not created by the landowner.
- A. This variance occurred due to the fact that Sec .66.343 Applicability of Traditional Neighborhood District Design Standards table, pertaining to item (13) ‘Door and window openings’ requires_for new commercial and civic buildings, windows and doors or openings shall comprise at least fifty (50) percent of the length and at least thirty (30) percent of the area of the ground floor along arterial and collector street facades. The T4M zoning code applies to various types of building structures such as office, residential, and retail. Hotels and parking ramp layouts can meet these requirements in portions of the building where the retail or amenities façades are directly adjacent to the public areas, To apply additional openings to the aforementioned restrooms or back of house operational areas is impractical to achieve.
 - B. Reference Sheet A-13 for elevation view of the hotel and parking ramp.
5. The variance will not permit any use that is not allowed in the zoning district in which the property is located.
- Hotels are permitted per the approved 2016-5-24 Master Plan which meet the T4M district requirements and Table 66.321 Traditional Neighborhood District Uses.
6. The variance will not alter the essential character of the surrounding area.
- A. The north façade of the hotel and adjacent parking ramp is designed to provide an active and engaging pedestrian environment at the ground level. The hotel includes a prominent entrance canopy that clearly identifies the primary public entry and establishes a strong architectural presence along the street. This feature contributes to pedestrian orientation and enhances overall streetscape character.
 - B. Additional awnings at windows and stair access door introduce architectural articulation at the pedestrian level and provide visual and functional interest along the building frontage. The second floor is recessed along this façade, which—when combined with the entrance canopy and street trees—reduces the perceived scale of the building and establishes a comfortable, pedestrian-scaled streetscape.
 - C. At the transition between the hotel and the parking ramp and where the stairway serving the parking ramp is located, a commissioned vertical public art mural is introduced at this connection serving as a visual anchor and contributing to a more engaging pedestrian realm. The mural is yet to be designed but will create scenes meaningful to Minnesota and what is depicted in Sheet

A-13 is a place holder for the mural. This feature enhances wayfinding, reinforces the public character of the street, and creates a focal point that encourages pedestrian interaction and engagement along the corridor. The 8-story hotel tower/ramp block is part and parcel of the phase one mixed use block development, i.e. complementary with blocks B2 and F1 and the stadium. Collectively, the intent is Phase One development activates and embraces the Great Lawn, the heart of the district, and the ethos of the Midway but also provides the required open space just south of the hotel building.

Refer to Sheet SD1-01 Block D Site Plan, Sheets A-1 thru A-5 (First, Second, Typical Floor Plan, Suite & Roof Plans), Sheets A-6, A-7, and A-12 (Exterior Elevations), and Sheets A13, A14 & A-15 (Exterior Rendered Views).

Block Diagram of United Village Phase 1



10 ft ROW Snelling Ave -0.10 acres
Added Pedestrian Sidewalk Width

Retail & Office

Parking

DEVELOPMENT LAND SUMMARY

United Village Phase 1

- Block B2- Office Retail -0.68 acres
- Block F1 - Food Pavilion -0.41 acres
- Block D - Hotel and Parking Ramp 1.26 acres

Total Phase 1 Development Land - 2.35 acres

Future Development Land

- Block A2 - 1.13 acres
- Block B1 - 1.02 acres
- Block C1- 1.10 acres (Parcel 7A and MLS L1, B1)
- Block C2 - 0.78 acres
- Block E - 1.94 acres
- Block F2 - 2.16 acres
- Block G - 1.52 acres

Total Future Development Land 9.38 acres

UNITED Plaza

Hotel Public Space

- Pedestrian Corridor
- Restaurant Pavilions
- Sculpture Court

OPEN SPACE SUMMARY

- Great Lawn, Ped Corridor & Sculpture Court - 0.82 acres
- Sculpture & Plaza (Univ & Snelling) - 0.72 acres
- United Plaza - 1.08 acres
- Playground - 0.35 acres
- Hotel Public Space - 0.40 acres
- SE Public Plaza and Bike Racks - 0.56 acres
- Snelling Ave Pedestrian Sidewalk Width -0.10 acres

Total Public Open Space 4.03 Acres

Playground

ROW SUMMARY

United Village Phase 1

- Simpson St - 0.36 acres
- N. Asbury St - 0.36 acres
- Spruce Tree Ave - 0.61 acres
- Snelling Ave - 0.10 acres

Total Phase 1 ROW - 1.43 acres

Future ROW

- Spruce Tree Ave - 0.63 acres
- Shields Ave - 0.72 acres

Total Future ROW 1.35 acres

SE Public Plaza and Bike Racks

Snelling-Midway Development

Appeal of BZA Decision to City Council

The development project is requesting two variances from the design standards of City Council Resolution 23-1442, which requires that for new commercial buildings facing arterial streets, window and door openings must comprise at least 50% of the length and 30% of the area of the ground floor façade. The proposed hotel's north façade, facing University Avenue, does not meet these standards at first floor as currently designed. The project is seeking variances for the following:

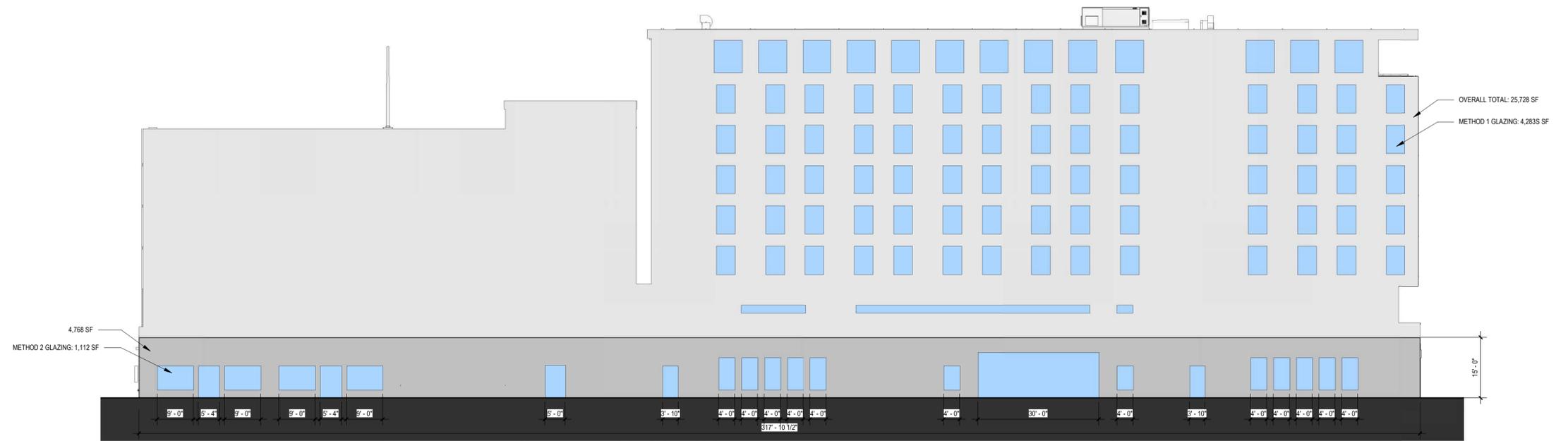
1. 43.1% is proposed for the length of openings for a variance of 6.9%
2. 23.3% is proposed for the area of openings for a variance of 6.7%

Due to nature of the property, all (4) sides of the hotel face arterial streets creating a unique challenge to meet the zoning requirements and to support back of house spaces, restrooms, and utility rooms. The building is also constrained in its' maximum allowable height, creating a shorter 1st floor than a typical hotel lobby and restaurant spaces. The overall design maximizes customer experience, connectivity to the surrounding neighborhood and intentionally establishes front doors on the north and south elevations. It is impractical to add windows to the first-floor north elevation within restrooms, elevator shafts and/or utility spaces, without compromising the customer experience and/or design connectivity. In the absence of glazing, the north elevation boasts curated art, statement canopies, thoughtful storefront and a pedestrian friendly main entry connecting the hotel to adjacent sidewalks and the LRT.

EXTERIOR ELEVATIONS - VARIANCE

FACADE OPENINGS (DOORS) AND WINDOWS PER ELEVATION

Comprehensive Façade	METHOD 1 - 63.110 (B)	NORTH University Ave	SF
General building design standards. For principal buildings above grade window and door openings shall comprise at least fifteen (15) percent of the total area of exterior walls facing a public street or sidewalk.	Entire Façade	25,728 SF	
	Glazed	4,283 SF	
	Portion Glazed	16.6 %	
	Requested Variance	0 %	
Building base Area	METHOD 2 - Resolution 3	NORTH University Ave	SF
All new commercial and civic buildings shall have window and door openings and at least 30 percent of the area around the ground floor along arterial, collector, and/or local street facades.	Entire Façade	4,768 SF	
	Glazed	1,112 SF	
	Portion Glazed	23.3 %	
	Requested Variance	7 %	
Linear distribution along street	METHOD 3 - Resolution 3	NORTH University Ave	LF
All new commercial and civic buildings shall have window and door openings that comprise at least 50 percent of the length along ground floor	Entire Façade	318 LF	
	Glazed	137 LF	
	Portion Glazed	43.1 %	
	Requested Variance	7 %	



② NORTH ELEVATION - VARIANCE DIAGRAM
1/16" = 1'-0"



① NORTH ELEVATION - VARIANCE
1/16" = 1'-0"

EXTERIOR RENDERS - VARIANCE



NORTH ELEVATION - RENDER



NORTHEAST ELEVATION - RENDER



NORTHWEST ELEVATION - RENDER

EXTERIOR RENDERS - VARIANCE



NORTH ELEVATION - RETAIL



ENLARGED RETAIL - MURAL



NORTH ELEVATION - MAIN ENTRY

EXTERIOR RENDERS - VARIANCE



SOUTH ELEVATION - RENDER



EAST ELEVATION - RENDER



WEST ELEVATION - RENDER



CITY OF SAINT PAUL

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Board of Zoning Appeals

Staff Report

TYPE OF APPLICATION: Major Variance **FILE #:** DSIBZA-000290-2026

APPLICANT: Loucks – Jon Knutson

HEARING DATE: February 17, 2026

LOCATION: 1560 University Avenue West

LEGAL DESCRIPTION: UNITED VILLAGE DEVELOPMENT LOT 1 BLK 2

PLANNING DISTRICT: 13

PRESENT ZONING: T4M, Green Infrastructure District Overlay

ZONING CODE REFERENCE: City Council Resolution 23-1442

DATE RECEIVED: January 26, 2026

REPORT DATE: February 13, 2026

DEADLINE FOR ACTION: April 11, 2026 **BY:** Kaozouapang Yang

A. **PURPOSE:** A development project at United Village Block D is requesting two variances from the design standards of City Council Resolution 23-1442 which requires that for new commercial buildings facing arterial streets like University Avenue, window and door openings must comprise at least 50% of the length and 30% of the area of the ground floor facade. The proposed hotel's north facade (facing University Ave.) does not meet these standards as currently designed. The project seeks variances for the following:

- 1) 43.1% is proposed for the length of openings, for a variance of 6.9%.
- 2) 23.3% is proposed for the area of openings, for a variance of 6.7%.

B. **SITE AND AREA CONDITIONS:** This is a 1.648-acre vacant property between Spruce Tree Avenue and University Avenue West, and future Asbury and Simpson Streets.

Surrounding Land Use:

North: Commercial, Vacant Lot , Surface Off-Street Parking (T4)

East: Vacant Lot / Surface Off-Street Parking (T4M)

South: Great Lawn, Restaurant Pavilions, Stadium - Allianz Field (T4M)

West: Sculpture Plaza and future Bailey Garden (T4M)

- C. **HISTORY/DISCUSSION:** The project is located within the Snelling-Midway Redevelopment Site, now known as United Village. In 2016, the City Council approved the Snelling-Midway Redevelopment Site Master Plan and Design Guidelines to establish a framework for long-term redevelopment of the area as a mixed-use, transit-oriented district (RES PH 16-239). In 2023, the City Council amended the master plan to refine and clarify development standards applicable to new construction within the redevelopment boundary (RES 23-1442).

The proposed hotel and structured parking development is part of Phase 1 of the United Village redevelopment. In March 2024, the Planning Commission approved a conditional use permit for additional building height and granted multiple variances related to the placement and design of the hotel and parking structure (Planning Commission Resolution 24-3). Following an appeal of that decision, the City Council reviewed the record and, in 2025, affirmed approval of the conditional use permit and associated variances, adopting the staff findings supporting the development (RES 25-390)

The present application is limited to additional variances concerning ground-floor window and door openings on the north façade of the building facing University Avenue. The applicant states that portions of this façade must accommodate service and operational functions typical of hotel development, which restrict opportunities for additional window and door openings. Staff finds that the requested variances are limited in scope and are consistent with the previously approved development framework and the overall redevelopment objectives established by the City for the United Village site.

E. **FINDINGS:**

1. **The variance is in harmony with the general purposes and intent of the zoning code.**

A development project at United Village Block D is requesting two variances from the T-district design standards. City Council Resolution 23-1442 condition's require for new commercial buildings facing arterial streets like University Avenue, windows and doors must comprise at least 50% of the length and 30% of the area of the ground floor facade. The proposed hotel's north facade (facing University Ave.) does not meet these standards as currently designed. The project seeks variances for the following:

1. 43.1% is proposed for the length of openings, for a variance of 6.9%.
2. 23.3% is proposed for the area of openings, for a variance of 6.7%.

The window and door openings standards are intended to create active, visually engaging street frontages that enhance the pedestrian environment. The proposed north façade concentrates window and door openings at public areas such as the entrance, lobby, and retail spaces, while service and operational functions occupy portions of the façade that do not support pedestrian interaction. Though the proposal provides less window and door openings than required, the façade continues to support pedestrian engagement along University Avenue. Given the modest scale of the variances, the proposal remains consistent with the purpose and intent of the zoning code.

The requested variances of 6.9% for length and 6.7% for area are relatively minimal. The applicant has strategically allocated the required window and door openings to the active,

public-facing functions of the hotel (entrance, lobby, retail), thereby achieving the functional intent of Sec. 60.103 to create pedestrian engagement and visual interest.

Requiring strict numeric standards would compel the applicant to punch unnecessary windows into service areas (housekeeping, mechanical, back-of-house) that offer no pedestrian benefit and may create security risks or privacy issues. Therefore, this specific design, despite the numeric shortfall, remains consistent with the intent of the zoning code of economic viability (a), transit-supportive density (i), flexible design standards (o), and the protection of property function (l). **Therefore, this finding is met for both variance requests.**

2. The variance is consistent with the comprehensive plan.

The St. Paul 2040 Comprehensive Plan establishes transit-oriented development along major corridors such as University Avenue as a core strategy for accommodating growth while advancing equity, sustainability, and neighborhood vitality. The proposed hotel at United Village Block D advances these goals by activating a redevelopment site with a use that generates pedestrian traffic, supports nearby transit investments, and concentrates visual engagement at the public entrance and retail areas. Though the north façade provides 43.1% length of openings (a 6.9% variance) and 23.3% area of openings (a 6.7% variance), it concentrates 100% of its window and door openings at points of actual pedestrian interface like the entrance, lobby, and retail spaces thereby achieving a higher quality of pedestrian engagement. The design is consistent with the 2040 Plan's urban design policies promoting active, pedestrian-friendly street frontages.

The project contributes to the diversification of the corridor's land use mix by introducing lodging, employment, and transit-accessible services. The development therefore advances, rather than undermines, the 2040 Plan's central mandate that equity and opportunity guide all growth decisions. Additionally, concentrating window and door openings only where it serves an active visual purpose reduces thermal heat loss on this north-facing facade, consistent with the Plan's resiliency goals through energy-efficient design.

Requiring strict numeric compliance would necessitate window and door openings in service areas overlooking blank interior walls or equipment rooms, creating a false sense of activity without public benefit while increasing costs and compromising hotel operations. Because the design achieves the substantive goals of the 2040 Comprehensive Plan such as the pedestrian-oriented urban design, transit-supportive density, non-displacement, and energy efficiency, the variances are consistent with both the letter and the equity-centered spirit of the Comprehensive Plan. **This finding is met for both variance requests.**

3. The applicant has established that there are practical difficulties in complying with the provision, that the property owner proposes to use the property in a reasonable manner not permitted by the provision. Economic considerations alone do not constitute practical difficulties.

There are practical difficulties for a hotel in complying with the City Council Resolution's standard for ground floor window and door openings along all street facades. The applicant's narrative describes characteristics inherent to all hotels including ground level restrooms, back-of-house operations, and service areas in addition to common public areas including a lobby and amenities. In the operation of a hotel, the main patron spaces are more centrally located around the lobby. The proposed north façade of the hotel provides window

and door openings at public areas including the entrance, lobby, amenity and retail spaces, while restrooms, service and operational functions like elevators and stairwells occupy portions of the façade that are impractical for additional window or door openings.

The property will be used in a reasonable manner as a hotel with the proposed façade design. The standards for window and door openings are intended to create active, visually engaging street frontages that enhance the pedestrian environment. To supplement the window and door openings in the public areas of the hotel, the applicant's intent is to include a mural on the ground level wall of the restrooms adjacent to the retail shops where openings are impractical to enhance the pedestrian environment, as shown on the building renderings.

This finding is met for both variance requests.

4. The plight of the landowner is due to circumstances unique to the property not created by the landowner.

The development comprises an entire city block, circumstances unique to the property that present challenges designing four active frontages that strictly comply with the ground floor window and door opening requirements. Due to the nature of the hotel uses and their typical layouts, window and door openings are proposed where there are active uses in the building, focused on the lobby area, hotel amenity spaces, and retail store fronts. The hotel floor plan and narrative describe the hotel's layout which includes private and service areas like restrooms, back-of-house space and operations where additional openings in such areas are impractical in design of a hotel with street frontage on all sides. **This finding is met for both variance requests.**

5. The variance will not permit any use that is not allowed in the zoning district where the affected land is located.

The proposed hotel and associated uses and amenities are permitted within the T4M zoning district. The requested variances relate only to design standards and do not authorize any prohibited use. **This finding is met for both variance requests.**

6. The variance will not alter the essential character of the surrounding area.

The project is part of an approved, multi-block redevelopment framework and directly implements the vision for University Avenue as a transit-oriented, pedestrian-supportive corridor. The surrounding area is characterized by a diverse mix of building types and architectural styles and contemporary mixed-use infill. A hotel facade that meets 43.1% length and 23.3% area window and door openings, with window and door openings strategically concentrated at active uses, fits comfortably within that varied urban fabric. It neither introduces a foreign typology nor establishes a precedent for wholesale waiver of design standards.

Because the project embodies the essential character of the corridor consisting of active, engaging, transit-supportive urban development, the requested variances will not alter the essential character of the surrounding area. **This finding is met for both requested variances.**

- F. **DISTRICT COUNCIL RECOMMENDATION:** Staff received a recommendation of approval from District 13 – Union Park District Council.
- G. **CORRESPONDENCE:** Staff have received a letter from Midway Chamber of Commerce in favor regarding these requests.
- H. **STAFF RECOMMENDATION:** Based on Findings 1 through 6, staff recommends approval of the requested variances to allow 43.1% length of openings and 23.3% area of openings on the ground floor of the building's north façade.