

From: rtvarco@comcast.net
To: [*CI-StPaul Contact-Council](#)
Subject: Sound Level Variance Requests set for public hearing on September 3, 2025
Date: Thursday, August 21, 2025 10:57:17 AM

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These comments concern the noise limit variance requests from University of St Thomas (UST) for ten football games to be played on its campus this Fall. September 5 and 9; October 4,10,16,18,21, and 25; and November 1 and 15. The discretion of the Council to grant these requests is limited by St. Paul's Legislative Code. Section 293.10 (e) 3 provides in relevant part that: “ (t)he variance may be granted only if the council finds that full compliance with ... (the noise limits) would constitute an unreasonable hardship on the applicant, on other persons, or on the community. The council shall balance the hardship to the applicant against the adverse impact on the health, safety and welfare of the persons affected, the adverse impact on the property affected, and any other adverse effects of granting the variance.”

Nothing in UST's applications identifies the unreasonable hardship the Code requires for the requested variances. Indeed what UST seeks is exactly what the Code prohibits, i.e., the operation of an entertainment venue that produces noise incompatible with a residential neighborhood. Given this deficit in the UST requests, it is reasonable for the neighborhood to be given the protective noise level accorded it. Granting the requests without the required showing contravenes the Code. The Council should act in compliance with the Code and deny the requested variances.

Richard Varco, Jr.

