



## CITY OF SAINT PAUL

DEPARTMENT OF SAFETY AND INSPECTIONS  
375 JACKSON STREET, SUITE 220  
ST. PAUL, MINNESOTA 55101-1806  
Phone: 651-266-8989 Fax: 651-266-9124  
Visit our Web Site at [www.stpaul.gov/dsi](http://www.stpaul.gov/dsi)

### 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.