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October 7, 2025

Mr. Mike Centinario  
Senior Planner  
City of Bloomington  
1800 W. Old Shakopee Road  
Bloomington , MN 55431-3027

Re: Land Use Application (Conditional Use Permit) for Remote Airport Parking

Dear Mr. Centinario:

We represent MOAC Mall Holdings, LLC owner and operator of the Mall of America (“MOA”). On behalf of MOA, please accept this letter as the required documentation to accompany the applications for a Conditional Use Permit (CUP) pursuant to §21.501.04 of the City of Bloomington zoning ordinance for remote airport parking under the standards set forth in 21.302.41 and a final site plan including revisions to the MOA sign plan.

### **Project Summary**

Recent revisions to the zoning ordinance allow remote airport parking as a conditional use in the CX-2 and HX-R districts, subject to performance standards for new facilities. New remote airport parking is permitted only when located within an existing parking structure that has excess capacity, with all access gates and shuttle storage contained inside the structure. Excess parking supply dedicated to remote airport parking may be demonstrated either by exceeding the off-street parking requirements of §21.301.06(d) or through a parking study.

MOA maintains one of the largest parking supplies in the region, with approximately 15,000 spaces serving the complex. To manage this capacity and enhance the guest experience, MOA partnered with the City of Bloomington in 2018 to implement an advanced parking guidance system developed by Park Assist. Installed across the east and west seven-level ramps and expanded into surface lots, this camera-based technology provides real-time digital signage and lighting to direct drivers to available spaces, including accessible stalls. Park Assist provides MOA’s operations team with real-time parking data which confirms that MOA maintains excess parking capacity 355 days each year.

Building on this foundation, MOA proposes utilizing the seventh floor of the east ramp (P7 East) to support its use of 902 parking stalls for remote airport parking operations. As demonstrated by the attached data, there are approximately 5–10 days each year when MOA would need to temporarily suspend the remote parking option in order to preserve additional onsite parking capacity. These dates include Black Friday, select days during the Christmas holiday period (such as the Saturday before Christmas), the busiest one or two Saturdays of Spring Break, and the Saturday of President’s Day weekend. Even on these peak dates, however, the P7 East level remains largely open, with between 50% and 85% of spaces available depending on the day. Even during several of the airport’s traditionally busiest travel times such as MEA weekend

and the entire summer season, P7 East is fully available and can be dedicated in its entirety to remote paid parking guests.

The operation will be fully integrated into MOA's existing parking system and will feature payment terminals, automated gates, and a seamless mobile platform for advanced reservations, enabling guests to pay on-site or in advance. As required by the zoning ordinance, all access gates will be located within the parking structure. Remote airport parking will benefit from light rail transit access directly through the parking structure elevator. In the event that operations required shuttle or circulator services, all such shuttles will be stored within the existing structure. With this application, MOA is requesting amendments to its existing sign approvals to ensure clear and efficient navigation for remote airport parking users.

### **Conditional Use Permit**

Remote airport parking is now a conditional use in the CX-2 District. The proposed use meets the required CUP findings of City Code Section 21.501.04(e)(1-5) as follows:

1. The proposed use is fully consistent with the City's Comprehensive Plan. The Property and surrounding area are designated High Intensity Mixed Use, with policies for the South Loop District aimed at promoting higher density and greater land use intensity than stand-alone surface remote airport parking would provide. By locating the use within an existing parking structure, the proposal achieves an appropriate balance: it allows remote airport parking to operate in the City while preserving significant redevelopment sites for the higher-density projects envisioned in the Comprehensive Plan and South Loop District Plan. This approach not only ensures consistency with long-range land use goals but also minimizes visual and operational impacts that would otherwise be more pronounced in the District.
2. The proposed use is consistent with the South Loop District Plan (SLDP). By limiting remote airport parking to an existing parking structure with demonstrated excess capacity, the proposal directly supports the SLDP's emphasis on achieving higher-density, mixed-use redevelopment on key sites while accommodating essential supporting uses. This approach strengthens the South Loop vision by reserving valuable redevelopment land for future growth, reducing surface parking impacts, and ensuring that remote airport parking operates in a manner aligned with the long-term land use and development goals for the District.
3. The proposed use is not in conflict with City Code provisions. The proposed remote airport parking use is consistent with the performance standards outlined in 21.302.41.
4. The proposed use will not create an excessive burden on parks, schools, streets, and other public facilities and utilities which serve or are proposed to serve the planned development. The proposed use is contained within an existing parking structure in operation for more than 20 years.
5. The proposed use will not be injurious to the surrounding neighborhood nor detrimental to the public health, safety, or welfare. Long-term parking within an existing parking structure is entirely consistent with the structure's primary permitted use and does not introduce new or incompatible impacts. The accompanying parking data demonstrates that implementation of the proposed use will not adversely impact parking availability for MOA patrons or otherwise diminish access for other users. The Property is already fully

lighted and operates under MOA's best-in-class security standards, ensuring a safe and well-managed environment. As such, the use maintains existing conditions without creating adverse effects.

The above narrative and findings are intended to suffice as the written documentation to accompany the land use application. In addition, please find the following attached materials:

1. Parking Plan and Site Design Set
2. Proposed sign amendments and traffic control sign additions
3. ParkAssist parking data for 2023, 2024, 2025

Please do not hesitate to contact me with any questions. Thank you.

Sincerely,

  
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