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PL2025-202

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December 17, 2025

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

Via Portal

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 our application 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 signage related to the CUP use.

Project Summary

MOA maintains one of the largest parking supplies in the Midwest, with over 15,000 spaces serving the complex. To manage this capacity and enhance guest experience, MOA partnered with the City of Bloomington to implement an advanced parking guidance system developed by Park Assist. Installed across the east and west seven-level ramps and expanded into the Mall's surface lots, this camera-based technology provides real-time digital signage and within the parking garage, available stall indicators to direct drivers to open spaces. 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) for overnight parking operations, branded "Park | Shop | Fly". While MOA reasonably anticipates that the majority of users will utilize this service for airport access, the program also creates a flexible transportation option for guests who wish to park, shop, and then travel via light rail to Twins, Vikings, or Timberwolves games, as well as other major regional events with light rail accessibility.

Recent revisions to the zoning ordinance allow remote airport parking as a conditional use in the CX-2 district, 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.

SRF Consulting completed the requisite parking study for the Project including onsite parking verification counts in November and December of 2025. As part of this investment, MOA also engaged Walker Consultants, developer of the parking model used to project capacity for the

last 33 years through all expansions of the Mall in order to guarantee that remote airport parking would not have an impact on guest experience.

Parking Analysis

In contemplation of this application, Walker Consultants evaluated parking demand at Mall of America ("MOA") using detailed hourly data from 2019 (pre-pandemic) through November 2025 to assess whether MOA can dedicate the roof level of the East Deck (907 spaces) to an airport park and fly program without creating parking or operational impacts.

The Walker analysis applies the industry-standard parking demand model used nationwide for large regional shopping centers, which evaluates parking needs based on the 20th highest hour of the year rather than isolated peak events. This approach intentionally discounts atypical spikes and instead measures the level of parking demand that reliably occurs under normal operating conditions. MOA provided this supplemental analysis to ensure that: 1) this application is consistent with its existing model for reviewing parking demand and 2) the City's outside consultant SRF had the benefit of Walker's long-standing work with the property and the City.

Using detailed, stall-by-stall data, Walker compared pre-pandemic conditions to current and projected demand to determine whether MOA's parking supply can support year-round operations. Walker's analysis shows that the design-hour demand remains substantially below pre-pandemic levels and has stabilized at a lower baseline, making the use of this segment of mall parking for Park | Shop | Fly operationally feasible.

Importantly, the model distinguishes between true system demand and short-term anomalies-like Black Friday. The Walker model accounts for seasonal variation, transportation mode shifts, and the availability of overflow facilities, ensuring that rare peak days can be managed without disrupting daily operations. This modeling matters because it demonstrates that even when parking capacity is evaluated conservatively, using accepted professional standards and multiple years of empirical data, and that the proposed Park | Shop | Fly use is compatible with existing parking demand under the long-accepted model for reviewing parking on the MOA campus. SRF's parking study utilizes this analysis through the lens of its third-party review. Reallocating a limited portion of parking supply will not create parking shortages, spillover impacts, or operational conflicts, and can be accommodated within MOA's existing parking system under foreseeable conditions.

Proposed Operations

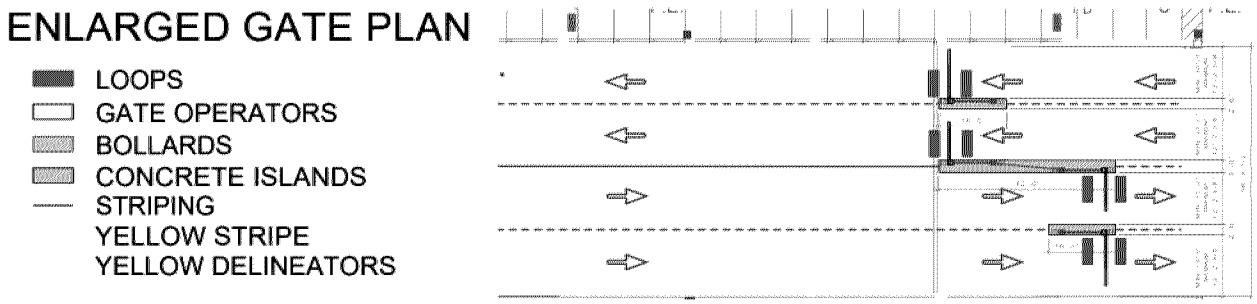
I. Parking Area Modifications and Reservation System

MOA proposes implementation of overnight parking as a strategic response to increasing regional parking demand and evolving airport-related parking pressures. The proposal is supported by regional parking data from the Metropolitan Airports Commission's (MAC) 2040 Long-Term Plan, which projects significant growth in parking demand at Minneapolis–St. Paul International Airport from approximately 29,400 spaces in 2025 to more than 36,000 spaces by 2040. Even under the most conservative assumptions, the MAC analysis identifies a parking deficit by 2040. Under more realistic scenarios that account for redevelopment, ramp conversions, and the loss of existing facilities, projected deficits range from roughly 2,000 spaces to more than 12,000 spaces. These findings underscore the increasing pressure on

nearby parking resources and the opportunity for MOA to constructively reuse parking capacity for the benefit of airport guests. As compared to other remote airport parking providers within the area, including hotel park and fly programs, airport parkers at MOA can pick-up last-minute items from its retailers, enjoy a meal, or benefit from the other amenities the mall offers.

The primary goals of the project are to enhance customer convenience, improve parking demand management, and generate revenue. P7 East has 907 parking spaces proposed for use as remote airport parking. This location was selected to allow for a controlled, scalable rollout while minimizing disruption to existing MOA operations. The system will be fully integrated and technology-driven, incorporating payment terminals, automated entry and exit gates, and a mobile platform that allows guests to reserve parking in advance or pay on demand.

Comprehensive design plans are incorporated as part of this application. Payment terminals are installed on the concrete islands shown below. No structural modifications are required to existing access points. As required by the zoning ordinance, all access gates will be located within the parking structure. The layout provides adequate vehicle queuing at the gates to avoid disruption to adjacent parking areas and maintains required fire access.



Operationally, the paid parking system is designed to prioritize ease of use and flexibility. Guests parking on-site may pay either by scanning a barcode ticket with a mobile device or by paying at the exit gate using a credit card.

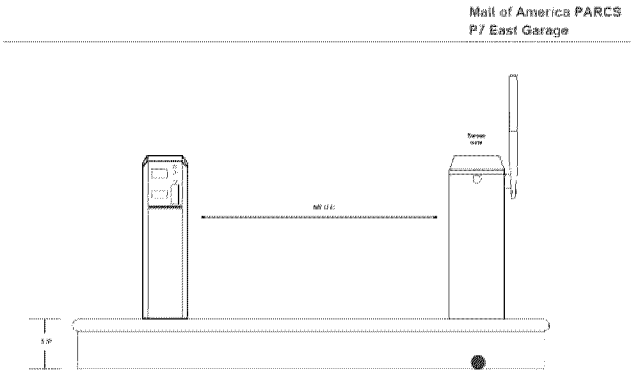


Figure 1: Entry System

Guests who prefer to plan ahead may reserve parking online through Mall of America's website, receive a digital barcode, and use that same barcode for entry and exit. The system proposed for use by MOA regularly accommodates 5,000 fans on game days in the "A", "B", and "C" ramps in downtown Minneapolis and is well suited to accommodate MOA guests.

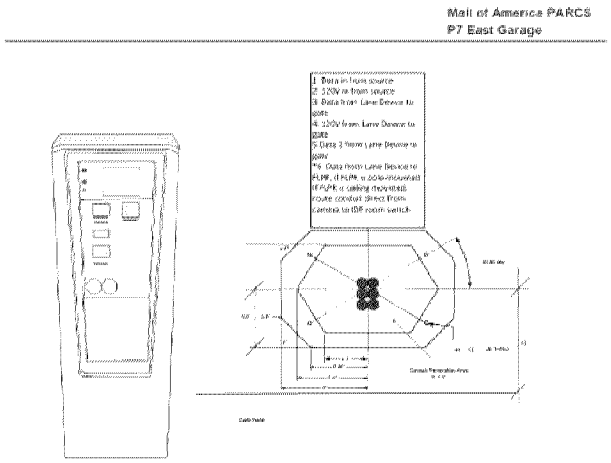


Figure 2: Exit System

II. Proposed Signage

MOA attracts over 32 million visitors annually. Over one billion people have visited the mall since it opened in 1992. This year, Black Friday drew a record 235,000 visitors in a single day. While MOA is a major local destination, approximately 40% of visitors are not from the metro area. Accordingly, MOA and the City have worked diligently to ensure that people visiting the mall can access the property efficiently.

Guests must be able to locate the new parking option and not disrupt other onsite operations. There are three types of signage alterations proposed for the Overnight Parking use. First, revisions to the "Dynamic Message Signs" that coordinate traffic around the mall campus. Second, additional internal directional signage within the mall property both static and dynamic and finally, new signage on the building advertising the Park | Shop | Fly use. Each are addressed in turn below.

A. Dynamic Message Signs Within the City Right of Way

Changeable Message Signs (CMS), also known as Dynamic Message Signs (DMS) or Variable Message Signs (VMS), are traffic control devices capable of displaying multiple messages, which can be changed manually, by remote control, or automatically. These signs are used to display regulatory, warning, and guide information to road users, and are particularly useful for conveying dynamic information such as traffic conditions or restrictions that vary by time, day, or condition. DMS signs within the local right of way are governed by the state of Minnesota Manual on Uniform Traffic Control Devices (MN MUTCD). The MN MUTCD establishes statewide standards for the design, placement, and use of traffic control devices—including signs, signals, and pavement markings. It applies to all public roads, as well as pedestrian and bicycle facilities throughout Minnesota. It helps ensure a consistent and predictable experience for everyone using our roads and active transportation networks.

The design characteristics of messages on DMS signs are detailed in Section 2L.04 of the MN MUTCD, while their legibility and visibility are addressed in Section 2L.03. DMS can be permanently located, as specified in Section 2L.08. DMS should display only traffic operational, regulatory, warning, and guidance information, and not advertising or unrelated non-traffic messages. They may also display traffic safety campaign messages, emergency homeland security messages, and AMBER alert messages. As described by the MN MUTCD DMS signs

are particularly effective to provide for lane control when changing circumstances require alternative access routes.

Based on the sheer volume of traffic generated by MOA and its associated attractions, resulting in over a billion dollars in spending annually within the mall alone, the property is benefited by DMS signage on surrounding local roadways. This signage was installed in 2015 (*See* 2015 South Loop District Local Road Wayfinding Plans and Protocol) in partnership with the City of Bloomington as part of a multiphase plan to better accommodate traffic, reduce emissions and to increase the efficiency of travel to and around the property. In addition to meeting these goals, the DMS signage also reduced the mall's dependency on the City's police department providing on-site traffic control for high volume days.

Figure 3: Existing DMS Signage

As part of this application, MOA is seeking to add language to these signs highlighting the new parking class within P7 East and also to refine existing language used on the signage so that it is consistent throughout the mall campus. Specifically, MOA desires to revise existing local roadway DMS 3, 4, 5, 6, 7, 9, 15, 16 as shown on the Local Roadway Signage and Internal Dynamic Signage Package Plan sheet.

The MN MUTCD requires state and local highway agencies with DMS to issue and maintain a policy regarding the use and display of all types of messages on the system. The policy previously adopted by the City for the South Loop District is included with this application. Just as mall users are directed to regular parking and valet parking and delivery drivers to loading areas, MOA proposes a change to the existing signage carousel to include "Overnight Parking-P7 East".

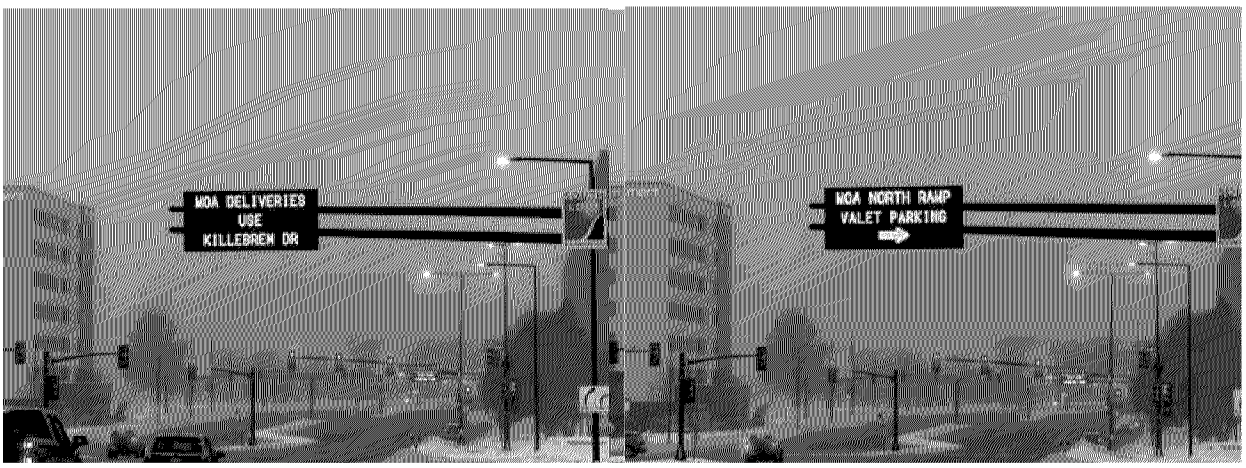
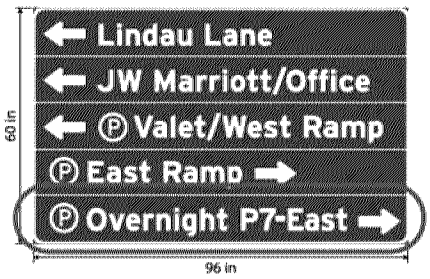


Figure 4: Delivery and Valet Parking Messaging

The proposed messaging conforms with the existing policy adopted for use of these signs and existing practice. Revisions to the public DMS package are designed to help parkers find the type of parking they are searching for when approaching the property: Valet; MOA Parking; Overnight Parking. The proposed language complies with the MN MUTCD message guidelines: Each DMS message shall consist of no more than two phrases, with each phrase understood by itself, the meaning of the message remaining the same regardless of the sequence. Where signage conforms to existing state guidance and adopted policy, as it does here, approval of package revisions is both appropriate and required.

B. Directional and On-Property Signage

Comprehensive signage will be installed within the East Parking Ramp and at key on-site decision points to clearly direct drivers to the paid parking area in P7 East. The signage strategy is intended to reduce confusion, limit internal circulation within the ramp, and maintain efficient traffic flow. All proposed directional signage is compliant with the City's sign ordinance and applicable Class IV Sign District standards.



Directional signage identifying the location or direction of areas within mall property are regulated signs exempt from permitting under the City's revised sign ordinance. Directional signage will be added to as shown here and as further described on the "Ring Road Decision" sheet of the Sign Graphics, Traffic Flow, and Ride Share Improvement Plans ("Sign Plan").

Wayfinding, transit identifiers, and elevator cab graphics entirely within the mall will be added to assist guests in locating and traveling to the Park | Shop | Fly facility. Examples of this signage are shown as "Ramp Directional Signs," "Transit Graphics," and "Park Assist Sign Modifications" on the attached Sign Plan. Similarly, the signs proposed at the central elevator bay and

internally within P7 East are located on private property and will not be visible from the public right-of-way (Signs A, B, C on the "Building Signs" sheet of the Sign Plan).

For clarity, signs identified as "monument signs" on approved building plan set reflect branding updates to existing Park Assist monument signage already installed within the parking decks and do not introduce new sign structures. No new monument signs are proposed by this plan. Dynamic message signs (DMS) located along the mall's internal ring road specifically at MOA gate 1 and MOA gate 4, are controlled by MOA and will be updated to reference overnight parking.

C. New Signs Advertising Park |Shop | Fly Use

Two building-mounted wall signs are proposed on the exterior façades of the elevator towers serving the parking structure, with one sign oriented toward each of two distinct public frontages (the Sears frontage and the frontage adjacent to the Crayola Experience). Each sign is supported by the wall of the structure, meeting the definition of a wall sign under the City's sign ordinance.

The elevator towers constitute enclosed, vertical building elements and are treated as standard nonresidential building façades for purposes of signage regulation. The proposed signs are therefore evaluated under the applicable standards for nonresidential buildings of seven stories or greater. Under those standards, building signs are permitted on all building elevations, up to eight signs per elevation, with no individual sign exceeding 400 square feet in area and subject to an overall building-frontage calculation.

Each sign falls within the square footage requirement, faces a public frontage, and no more than one sign is proposed per elevation. The signs will be constructed of permanent, durable materials and will be maintained in accordance with the City's maintenance and safety standards. The signs will be affixed to existing architectural elements and do not involve freestanding structures.

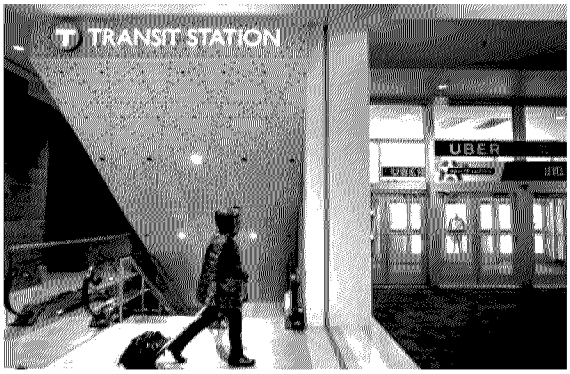
The elevator tower wall signs are compliant building signage for a nonresidential structure within the Class IV sign district and are consistent with the scale, visibility, and design parameters contemplated by the City's sign ordinance. The City's sign code has been substantially revised since the existing façade signage was originally approved. To the extent staff does not concur with the conclusion that the proposed wall signs comply with the current code, the applicant respectfully requests consideration of flexibility pursuant to Section 21.501.06.

III. Accessing the Airport

This plan integrates overnight paid parking with existing transportation options serving the airport. P7 East provides direct access to established rideshare operations and to the Metro Blue Line, which offers direct connections to both Terminal 1 and Terminal 2 at MSP Airport.

A. Integration with Light Rail Transit

The transit station at MOA is the busiest transit station in Minnesota. It serves as a major transit transfer point and is the terminus for the Hiawatha Light Rail Transit (Blue Line) and the Cedar Avenue Bus Rapid Transit (Red Line). Up to four future Arterial Bus Rapid Transit (Rapid Bus) lines will use the station. The MOA Station is on the lower level of the Mall of America (MOA) east parking deck and is immediately accessible from P7 East. The Blue Line runs from 4:13am with the last train departing at 12:10am. It is a twelve-minute ride to the airport with stops at both terminals. Guests will have access to the transit center directly from the East Ramp elevators. Light Rail tickets may be purchased from the pay stations within the transit center.



B. Ride Share Accessibility

Guests may also access the airport via rideshare services. As shown on the "Ride Share" sheet of the Sign Plan, four stalls are designated as rideshare waiting areas. Although Mall of America currently provides five designated rideshare pick-up and drop-off locations (East Ramp, West Ramp, North Entrance, Radisson Blu, and JW Marriott), the East Ramp, Level 1 location will be the most accessible for Park | Shop| Fly customers. The number of rideshare stalls in this location will increase from two to four to accommodate anticipated demand and potential increased use as shown on the "Ride Share" sheet of the attached Sign Plan.

C. Shuttle Service

No shuttle service is proposed at this time. Any shuttle vehicles, if utilized in the future, would be staged and stored exclusively within non-guest parking areas on Level P0 of the East Garage, specifically within the Blue Lot located in the southeast corner of P0 East. To be clear, this area is not accessible to guests for parking and is not included within the mall's guest parking count.

Consistent with existing operations, including the Mystic Lake shuttle service, any shuttle bus service would originate from the Transit Center. Shuttle operations would follow established, best-in-class operational practices. The number of vehicles and departure frequency would be determined at a later date.

Based on the configuration of the Transit Center pick-up area and the demonstrated experience of comparable shuttle operators within the facility, shuttle operations would not result in vehicle stacking, queuing, or circulation conflicts. All shuttle vehicles would be staged and stored in non-guest areas, ensuring no impact to guest parking availability.

D. Secured Access

Both vehicles and guests will have 24 hour access to the Park | Shop |Fly facility. Guests will receive barcode access from either the advance registration system or through the pay on site system. Scanning this barcode at the central elevator bay will allow guests to regain entry to P7 East 24 hours a day. 24/7 MOA dispatch will be in place to address any technical challenges guests encounter. All lighting is compliant with prior City approvals and no changes to existing lighting are proposed. Consistent with existing conditions, lighting within P7 East will continue to be activated based on occupancy and motion detection, minimizing unnecessary light spill while maintaining clear visibility for guests accessing their vehicles.

MOA Security Dispatch and Patrol operate 24 hours a day, every day of the year and is staffed to accommodate this proposed use. MOA has many different safety protocols in place throughout its campus and the P7 decks are no exception. Those protocols will be enhanced as part of this effort including the secured access described above.

Overall, the proposed paid parking program represents a targeted, data-driven approach to managing growing parking demand in a constrained regional environment. By starting with P7 East and using a flexible, technology-enabled platform, MOA can address near-term pressures while retaining the ability to scale the system if future demand warrants.

Conditional Use Permit

Remote airport parking is 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. Conditional Use Permit Application
2. 2015 South Loop District Local Road Wayfinding Plans and Protocol
3. Approved Parking Plan Set for Construction of Improvements ("Construction Permit Set")
4. Park | Shop | Fly- Sign Graphics, Traffic Flow, and Ride Share Improvement Plans ("Sign Plan")
5. Park | Shop | Fly- Overnight Parking at Mall of America Operational Plan
6. Local Roadway Signage and Internal Dynamic Signage Package
7. Park Assist Data and Walker Consulting Summary
8. Conditional use permit application fee of $220.00.

Please do not hesitate to contact any member of the development team with any questions. Thank you.

Sincerely,

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Larkin Hoffman
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Park|Shop|FLY at Mall of America®

December 2025

AGENDA

1. Introductions
2. City of Bloomington Update
3. Mall of America Update

GOALS AND OBJECTIVES

The goal of implementing a paid parking system at Mall of America is centered around enhancing customer convenience, generate revenue and manage parking demand effectively.

Our objective is to implement a fully integrated paid parking system at MOA, starting with P7 East. This system will include payment terminals, automated gates, and a seamless mobile platform for advanced reservations, allowing guests to pay on-site or in advance.

PARKING SHORTAGE

The Metropolitan Airports Commission (MAC) 2040 Long-Term Plan (LTCP) outlined parking projections for MSP Airport, addressing public and employee parking needs.

Total parking demand grows from **29,410 spaces in 2025** to **36,100 spaces in 2040**.

Table 1: Existing and Future Public and Employee Parking Requirements

	Base Year (2019)	2025	2030	2040
On-Airport	18,800	21,090	22,640	25,900
Off-Airport	5,700	6,370	6,840	7,820
Employee	1,900	1,950	2,080	2,380
Total	26,400	29,410	31,560	36,100

Three parking scenarios were analyzed to estimate surplus or deficit compared to existing conditions. The scenarios considered various factors like the opening of existing facilities, conversion of ramps for public parking, and loss of parking due to construction. Under the three scenarios:

- Scenario 1 assumes all existing parking facilities are open and not impacted by any development. It estimates a deficit of 2,880 at 2040.
- Scenario 2 assumes off-airport developments have reduced private operator parking and some on-airport ramp levels are converted to public parking. It a deficit of 2,180 at PAL 3.
- Scenario 3 assumes that in addition to scenario 2 impacts, Valet Ramp and Green and Gold Ramps are demolished, with loss of Park 'N Go surface lot and Park 'N Fly ramp. It projects deficits of 5,540, 7,690, and 12,230 spaces at PAL 1, PAL 2 and PAL 3, respectively, after accounting for the loss of existing parking facilities and ramps.

Table 2 below shows the surplus/(deficit) in each stage.

Table 2: Different Scenarios' Parking Surplus/Deficit

	Base Year (2019)	2025	2030	2040
Scenario 1	6,820	3,810	1,660	(2,880)
Scenario 2	N/A	4,510	2,360	(2,180)
Scenario 3	N/A	(5,540)	(7,690)	(12,230)

MOA OPERATIONAL PLAN

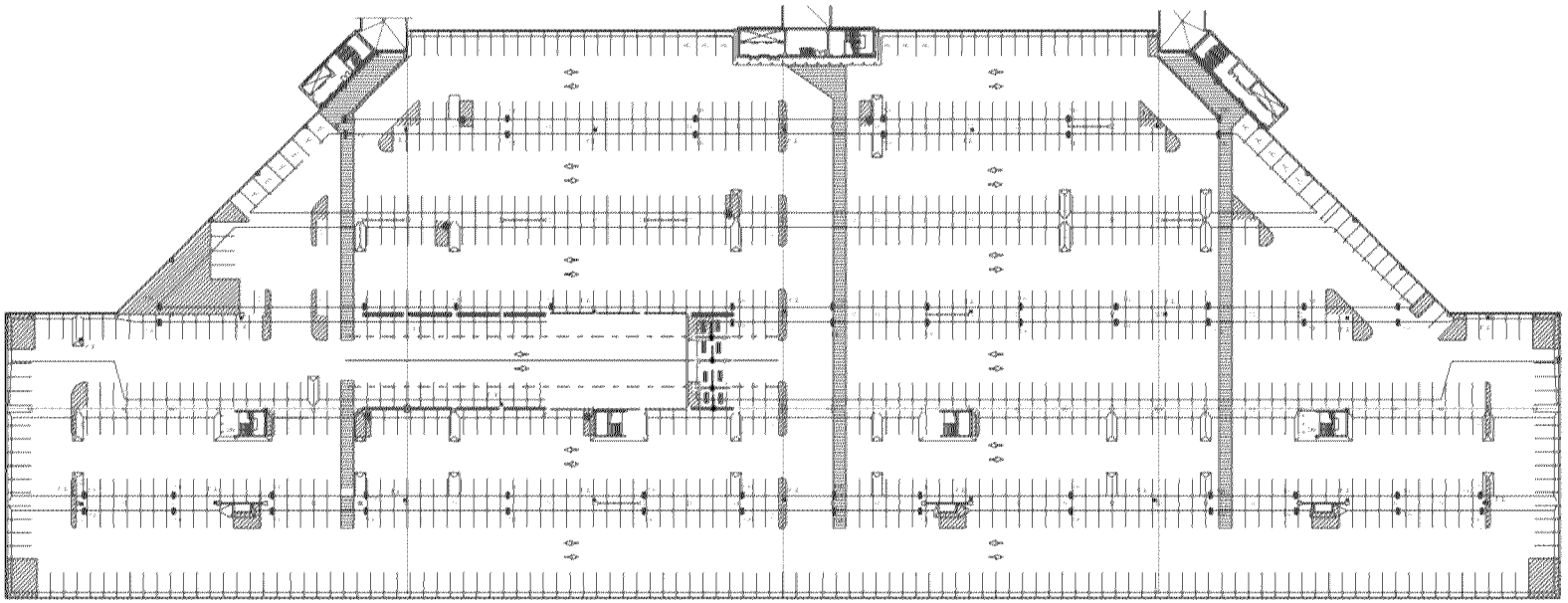
Advanced Reservation System – A user-friendly online platform tied to mallofamerica.com allowing guests to reserve parking in advance.

On-Demand Parking & Mobile Payment – A seamless, mobile-enabled solution for on-the-spot parking availability and payment, ensuring a smooth guest experience.

Comprehensive Signage Package – Strategically placed signs guiding guests to P7 East, ensuring clear and efficient navigation throughout the parking areas.

Ride Share + Transit - We will provide the guests with options for transportation to the airport via Rider Share and Transit.

P7 EAST PARKING



907 parking spots in P7 East will be designated for paid parking.

Signage will be strategically placed throughout the east ramp to guide guests effortlessly to designated paid parking areas.

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USER EXPERIENCE:

ONSITE PAYMENT

Arrival: Guest drives up to the parking entrance.

Payment Station: Guest approaches the payment station and selects the option to purchase a parking ticket.

Ticket Issuance: A ticket is dispensed with a barcode.

Payment Options:

1. **Option 1**: Scan the barcode with your phone and enter payment information (Apple Pay, Google Pay, PayPal, or credit card).
2. **Option 2:** Pay when leaving by inserting your credit card at the exit gate.

Exit: Guest leaves the parking area by scanning the ticket barcode at the exit gate.

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USER EXPERIENCE:

ONLINE PAYMENT

Website Access: Visit mallofamerica.com/parking on mobile or desktop. Navigate to parking reservation site:

Reservation: Reserve a parking spot and receive a barcode.

Payment: Enter payment information on the website during the reservation process: Credit Card

Arrival: Drive to the parking entrance and scan the barcode to enter.

Exit: Scan the same barcode at the exit gate to leave.

Transportation to Airport: User Experience

Uber + Lyft

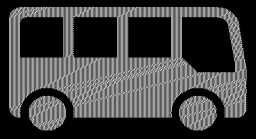
P7 East Central Elevator(s)

- Sign on Central Tower Above Access Point
- Update Signs in Elevators

Direct Access to P1 East Ramp

Existing Rideshare Operation

- Located directly adjacent to elevator



Transit (Blue Line)

P7 East Central Elevator(s)

- Sign on Central Tower Above Access Point
- Update Signs in Elevators

Direct Access to P0 East (Transit Area)

Existing Transit Operation

Blue Line Has Direct Access to MSP Airport

- Both Terminal 1 and Terminal 2