



February 25, 2026

Two Whom in May Concern:

The Bloomington Housing and Redevelopment Authority is initiating a City Code amendment to address a growing issue with towers located on places of assembly. The proposed amendment would allow existing towers on places of assembly to remain if the property is redeveloped into residential. The code currently allows towers with antennas in residential zoning district if located on certain properties including:

- i) Place of assembly sites, when the antenna support structure is fully camouflaged as a bell tower, steeple or similar structure;
- (ii) Park sites, when compatible with the nature of the park; and
- (iii) Government, school, utility and institutional sites.

Many times towers are located on places of assembly due to the larger lot size and proximity to residential users. However, when a place of assembly closes its doors the opportunity to redevelop the site is limited. Ideally, a new place of assembly will reuse the existing building and the tower remains. However, many of these buildings were developed in the 1950 and 60's and are often lacking in size or amenities required by modern users. Additionally, a place of assembly located in the middle of single family neighborhood is less attractive because of its lack of regional access. In these situations, demolishing and redeveloping the site into residential is optimal.

The code, as written today, would not allow the site to redevelop into residential and the tower to remain. The code does not allow towers in residential. The tower companies usually have long term lease (30+ years) protecting their investment into the property. These agreements include access rights, right of first refusal to purchase the property, and input regarding reuse and redevelopment of the property. Without allowing towers in residential zoning districts the ability to redevelop is greatly reduced. Developers would need to negotiate a buy out the tower lease which will likely be cost prohibitive or in some cases impossible due to the strong rights afforded the tower company. The result would be a place of assembly closing and a large unmaintained vacant parcel remain in a residential neighborhood to support the tower.

The proposed amendment would be narrowly tailored to allow existing towers on places of assembly to remain in residential development. This would not permit new towers in residential properties. Narrowly tailoring the code to existing towers ensures continued service to the neighborhood without adding any new impacts.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Palermo".

Michael Palermo
Assistant Housing and Redevelopment Authority Administrator