

GENERAL INFORMATION

Applicant: Bloomington Housing and Redevelopment Authority (HRA)
Location: Citywide
Request: Privately initiated City Code Amendment to allow towers at former place of assembly sites in residential zoning districts

CHRONOLOGY

Planning Commission	04/02/2026	Recommended approval (Vote: 6-0, 1 abstention)
City Council	05/04/2026	Public hearing scheduled

DEADLINE FOR AGENCY ACTION

Application Date:	02/25/2026
60 Days:	04/26/2026
Extension Letter Mailed:	Yes
120 Days:	06/25/2026
Applicable Deadline:	06/25/2026

STAFF CONTACT

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PROPOSAL

The Bloomington Housing and Redevelopment Authority (HRA) is proposing a City Code Amendment to allow towers at former place of assembly sites in residential zoning districts that have been redeveloped. The Code currently allows towers at places of assembly when the antenna support structure is fully camouflaged as a bell tower, steeple or similar structure. The proposed amendment would allow the tower to remain if the place of assembly site is redeveloped into another Code-complying use per the underlying zoning district. The proposed amendment would be as follows, with added language underlined (reflects revised version as recommended by Planning Commission):

§ 21.302.37 TOWERS AND ANTENNAS.

(b) Area specific requirements for towers and antennas.

(1) *Towers outside the right-of-way in residential zoning districts.* Towers are allowed only in the following residentially zoned areas:

(A) Towers supporting amateur radio antennas and conforming to all applicable provisions of this code are allowed only in the rear yard of residentially zoned parcels.

(B) Towers supporting commercial antennas and conforming to all applicable provisions of this code are allowed only in the following residentially zoned locations:

(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; ~~and~~[-]

(iv) Former place of assembly sites that have been redeveloped, when the tower was legally established at a place of assembly site and is fully camouflaged as a bell tower, steeple or similar structure

Figure 1 – Tower at St. Mark’s Church



The Bloomington HRA has submitted this request to aid in the redevelopment of the St. Mark’s place of assembly located at 8630 Xerxes Avenue South. In 2025, the Bloomington HRA applied for a Comprehensive Plan Amendment to reguide this site from Quasi-Public to Low Density Residential (see [Case #PL202500084](#)). The application was approved by the City Council on August 25, 2026. The site is now guided Low Density Residential in the Comprehensive Plan. To redevelop the site as low density residential uses, the approval of a Type III Preliminary and Final Plat would be required to subdivide the property into residential lots. A plat application has not yet been submitted. The St. Mark’s site currently has a tower camouflaged as a bell tower that hosts telecommunications equipment – see Figure 1. The long-term leases associated with these facilities can complicate the redevelopment of place of assembly sites. The submitted City Code Amendment is intended to ensure the tower does not become legally nonconforming as a result of the change in use.

ANALYSIS

It is common for towers to be located on place of assembly sites due to the large lot size, taller structures (bell towers or steeples) to attach antennas, and proximity to existing residential. However, when a place of assembly discontinues operation, the future use of the existing site, including the tower, is limited. A new place of assembly user may take over the existing facility, allowing the tower to remain. However, many places of assembly buildings were constructed in the 1950s or 1960s and the building may be outdated, which makes reuse challenging. Further, there may be significant interest in redeveloping the place of assembly site given that places of assembly are often integrated within residential neighborhoods, are substantial sized properties, and already have access to City streets and utilities. Therefore, demolishing the building and redeveloping the site into residential may be the best reuse depending on the circumstance.

In the existing Code, towers are only allowed in residentially zoned locations at park sites, government, school, utility and institutional facilities, and places of assembly. The proposed amendment would allow for the tower to remain if the property were to be redeveloped into another Code-complying use, but only on former place of assembly sites when the tower was legally established. The proposed amendment would not allow towers on existing single-family residential sites. Rather, they would only be allowed at former place of assembly sites that have been redeveloped into residential or other Code-complying uses.

Wireless companies have long-term leases on the property, typically 30 or more years. The lease agreements usually include language such as right of first refusal, access rights, easements, and input regarding future use of the land. Without the proposed amendment, future reuse of the land would be challenging without allowing towers to retain legal status. Developers would need to buy out the lease, which can be very expensive and cost prohibitive. Absent some resolution with the lease and decommissioning of the tower, the result could be a large, poorly maintained site in a residential neighborhood that is used to house a tower.

The proposed amendment is narrowly written to only accommodate existing towers on place of assembly sites that are redeveloped into other Code-complying uses. The amendment would allow continued wireless service to the neighborhood while also providing reuse of the land into residential development. It would also require that these facilities continue to be camouflaged in a way to reduce visual impact.

There are five towers currently located at existing places of assembly in Bloomington. These sites are identified in Table 1. Should the privately initiated City Code Amendment be adopted, these are the sites that could be impacted by this policy change in the future. Overall, the proposed amendment allows for a smoother path for the reuse or redevelopment of place of assembly sites without compromising the legal status of towers that were legally constructed in the past. Staff views this amendment as the removal of a potential barrier to redevelopment and is supportive of the City Code Amendment.

Table 1 – Existing Place of Assembly Sites with Towers

Place of Assembly	Property Location	Case File #	Approval Date
St. Mark’s Church	8630 Xerxes Ave. S.	7758A-08	11/03/2008
Oak Hill Church	8901 France Ave. S.	4232A-08	02/02/2009
Mt Hope Lutheran Church	3601 W. Old Shakopee Rd.	6096A-09	06/22/2009
Holy Emmanuel Lutheran Church	201 E. 104 th St.	6739A-09	09/28/2009
Redemption Lutheran Church	927 E. Old Shakopee Rd.	3400A-15	11/05/2015

FINDINGS

There are no explicit findings that must be met for the review and approval of an ordinance. Rather, the purpose of the towers ordinance is most relevant. The purpose of the towers ordinance is to accommodate communication needs of the community while also protecting the public health, safety and welfare. Staff is supportive of the privately initiated amendment, which will facilitate redevelopment within existing neighborhoods while not compromising the legal status of existing facilities.

OUTREACH

Outreach/Notification

- Newspaper Notice (10-day notice – 03/19/26 and 4/16/26 Sun Current)
- Public Hearing Notice Online
- E-Subscribe Group Notification

PLANNING COMMISSION ACTION

The Planning Commission held a public hearing and unanimously recommend approval of the proposed ordinance following discussion at their April 2nd meeting (Vote: 6-0, Isse abstaining). Except for comments provided by the applicant, no one testified at the public hearing. The Planning Commission modified the proposed ordinance to clarify this only applies to existing towers. The revised ordinance is below.

- (i) Former place of assembly sites that have been redeveloped, when the tower was legally established at a place of assembly site and is fully camouflaged as a bell tower, steeple or similar structure.

Minutes from the Planning Commission meeting are attached for reference.

RECOMMENDATION

The Planning Commission and staff recommend approval of the ordinance through the following motion:

Motion by _____, seconded by _____, to adopt Ordinance No. 2026-____, an ordinance allowing existing towers at former place of assembly sites in residential zoning districts, thereby amending Chapter 21 of the City Code.

Staff recommends summary publication of the ordinance through the following motion:

Motion by _____, seconded by _____, to adopt Resolution No. 2026-____, a resolution authorizing summary publication of Ordinance No. 2026-____, an ordinance allowing existing towers at former place of assembly sites in residential zoning districts, thereby amending Chapter 21 of the City Code.