



**NuLife Holdings LLC & NuLife Recovery**

4000 Central Ave NE

Columbia Heights, MN 55421

## **Narrative Framework for Zoning Text Amendment & Variance Request**

**Applicants:** NuLife Holdings LLC & NuLife Recovery

**Parcel ID:** 35-30-24-41-0163

**Property Address:** 4000 Central Ave NE, Columbia Heights, MN 55421

**Mailing Address:** NuLife Holdings LLC c/o Twin Cities Roofing, [REDACTED]  
[REDACTED]

**Current Zoning:** Central Business District (CBD)

**Proposed Use:** 245G Medical Treatment and Wellness Facility

### **Introduction and Purpose of Request**

The Applicants respectfully submit this application to request a **Zoning Text Amendment** to the Columbia Heights Central Business District (CBD) ordinance to include “Residential Care Facilities” as a “Permitted” or “Conditional Use”, as well as a concurrent request to **amend or grant a variance** regarding the City Ordinance service restrictions on Residential Care Facilities to allow for integrated outpatient services.

The objective is to repurpose the vacant commercial building at 4000 Central Ave NE into a state-of-the-art, 245G-licensed medical treatment and wellness facility. The proposed operational model optimizes the building’s three-story layout:

- **Floors 1 & 2:** Dedicated exclusively to short-term inpatient residential housing.
- **Floor 3:** Dedicated to treatment programming, securely accommodating inpatient clients during daytime hours (Monday–Friday) and outpatient clients during evenings and weekends.

### **Why a Text Amendment is Necessary**

A text amendment—rather than a parcel rezoning to a Limited Business (LB) District—is necessary to preserve the existing property's compliance. The structure's exterior facade approaches or exceeds 40-to-42 feet, which strictly conflicts with the 35-foot maximum building height restriction imposed in the LB District. The following narrative outlines how this proposed use aligns with the City's comprehensive planning goals, mirrors existing

permitted medical uses, and provides substantial economic benefits to the downtown corridor.

### **Precedent for Evolving Central Business District Uses**

The Columbia Heights CBD is the commercial heart of the city, designed to accommodate a diverse and evolving mix of services, retail, and professional spaces. Historically, the City has demonstrated a willingness to amend the permitted and conditional uses within the CBD to adapt to changing market demands—such as the previous additions of recreational facilities like billiard halls and bowling alleys.

The integration of a modern medical wellness facility represents a similar, necessary evolution of the downtown district. By updating the zoning text to permit Residential Care Facilities in the CBD, the City ensures that its downtown remains a dynamic, mixed-use hub that adapts to modern healthcare and professional service demands.

### **Economic Revitalization of a Stagnant Property**

The property at 4000 Central Ave NE has sat vacant and unutilized for several years. In its current state, the vacant footprint detracts from the vitality of the Central Avenue corridor and produces no active economic footprint for the surrounding business community.

NuLife Recovery proposes a substantial capital investment to fully renovate the interior of the building, bringing it up to modern architectural, aesthetic, and safety standards. Activating this property will eliminate a prominent downtown vacancy, prevent the risk of blight, stabilize the block, and increase the inherent property value of both the subject parcel and neighboring properties.

### **Substantial Job Creation & Local Economic Impact**

The proposed facility will be a thriving, high-volume contributor to the local economy. In Phase One of operations, the facility will create an estimated 30 to 50 immediate full-time equivalent (FTE) jobs, spanning professional medical staff, counselors, administrative personnel, security, and facility maintenance.

Operating across three shifts, this consistent influx of professionals will provide a direct secondary economic benefit to the CBD. Staff, visitors, and facility vendors will regularly patronize local downtown restaurants, coffee shops, and retail establishments, generating sustainable, year-round daytime and evening foot traffic that supports the broader Columbia Heights commercial ecosystem.

### **Medical Facility Parity within the CBD**

Under the current Columbia Heights zoning code, a "Clinic, medical or dental" is a Permitted (P) Use within the CBD. NuLife Recovery's proposed operation is, fundamentally, a highly regulated medical facility focused on holistic, evidence-based practices and wellness.

The primary distinction between the proposed 245G program and a standard permitted medical clinic is the logistical requirement for short-term, overnight residential care for a portion of the patient population, as overnight care facilities are currently not provided at standard clinics. Because the intensity of the use, the professional nature of the staff, and the daily operations mirror those of standard medical offices and clinics already permitted in the CBD, allowing this use via a text amendment represents a logical parity in municipal zoning logic.

### **Current City Ordinance Regarding State-Licensed Residential Care Facilities**

Current municipal code regarding State Licensed Residential Care Facilities dictates that *"On-site services shall be for residents of the facility only."* To accommodate the necessary outpatient component without triggering severe state licensing conflicts or artificial property subdivisions, the Applicant requests the following legislative modification to the text:

### **Proposed Ordinance Amendment (CBD Text) for State Licensed Residential Care Facilities**

"On-site services shall be for residents of the facility only, except where the facility is located within a multi-story commercial structure and maintains distinct separation (architecturally or by schedule) between residential and non-residential clients."

*Alternative Language:* "If the facility is a single-family or two-family dwelling, on-site services shall be for residents of the facility only."

While splitting the building into two separate addresses was considered to circumvent the current restriction, doing so creates severe regulatory and operational complications. Operating under multiple addresses triggers dual property tax burdens, leasing and billing complications, and more importantly, significant licensing conflicts under the state's 245G framework. Maintaining one integrated entity and license ensures the highest standard of regulatory compliance, safety, and oversight.

### **Alignment with Variance Standards (Practical Difficulties)**

Should the city prefer a Variance over a text amendment for this restriction, the request is justified by unique **practical difficulties** inherent to the property's physical structure:

1. **Inherent Physical Layout:** The building's rigid, multi-story vertical layout makes physical subdivision into separate addresses structurally impractical, yet its floor plates provide ideal, built-in physical segregation for different care tiers.

2. **Regulatory Compliance:** Artificially splitting the building into two separate physical addresses to circumvent the text restriction would trigger severe state licensing conflicts under the Minnesota 245G framework, effectively denying the property a reasonable, permitted medical use.

### **Strict Operational Controls & Logistics (Address of Dual Use within the City Ordinance)**

To ensure the dual-use facility integrates seamlessly and safely into the CBD, the applicant is implementing rigorous logistical separations, including:

- **Architectural Separation & Scheduling:** Outpatient and residential spaces are restricted to separate floors. The programming floor (Floor 3) will operate as a shared space utilizing dual-use scheduling separations: daytime Monday-Friday programming for inpatient clients, and evening/weekend programming for outpatient clients.
- **Advanced Access Control:** The facility will utilize state-of-the-art access control and security systems, with keycard-controlled front elevator and front stairwell (requiring ID badges) to ensure outpatient clients can *only* access the designated programming floor, keeping them completely physically separated from inpatient clients.
- **24/7 Security & Staffing:** The property will be actively managed and monitored around the clock by professional staff.
- **Required Curfews:** Residential patients will be subject to strict rules, curfews, supervision, and rigid daily schedules, resulting in highly controlled, minimal exterior foot traffic compared to standard retail or commercial uses.

### **Conclusion**

The proposed text amendment and concurrent variance represent a collaborative opportunity to eliminate a prolonged commercial vacancy, generate dozens of professional jobs, and bring a high-quality medical use to a district where medical clinics are already welcomed. We respectfully request approval of this application to allow NuLife Recovery to invest in the vitality and safety of the Columbia Heights community.