

**STATE OF MINNESOTA
BEFORE THE
PUBLIC UTILITIES COMMISSION**

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Chair
Commissioner
Commissioner
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Commissioner

**In the Matter of the Application for a
Route Permit Application for the
Laketown 115-kV Transmission Line in
Carver County, Minnesota**

Docket No. ET2/TL-24-132
OAH Docket No. 21-2500-40445

**COMMENTS ON ENVIRONMENTAL
ASSESSMENT**

INTRODUCTION

Great River Energy submits these comments on the Environmental Assessment (EA) prepared by the Department of Commerce, Energy Environmental Review and Analysis (EERA) regarding the Laketown 115-kilovolt (kV) transmission line and substation project (Project) being proposed by Great River Energy and Minnesota Valley Electric Cooperative (MVEC and, together with Great River Energy, Applicants) in Carver County, Minnesota. Because these comments largely relate to the route alternatives studied in the EA, the Applicants are submitting these comments in advance of the public hearing so that these comments are available to the public and other stakeholders during the May 21-22 public hearings. As discussed in greater detail in the sections below, the Proposed Route is the best route for the Project considering both reliability and potential human and environmental impacts. In contrast:

- Route Alternative A is opposed by Carver County because it would interfere with Carver County's planned highway expansion and relocation; this alternative also impacts the greatest number of residences.
- Route Alternative B would reduce the reliability of the system as compared to the Proposed Route.

- Route Alternative C is opposed by the City of Victoria because it conflicts with current development. This alternative crosses a recently annexed area of the City of Victoria and would travel over the top of two currently planned developments.

The Applicants appreciate the opportunity to submit these comments and will any additional comments after the public hearings.

COMMENTS

I. OVERVIEW OF ROUTE ALTERNATIVES EVALUATED IN THE EA.

The EA evaluates the Proposed Route, one alignment alternative (Alignment Alternative D), and three route alternatives:

- **Route Alternative A** begins at the proposed Laketown Substation and would generally follow Carver County State Aid Highway 10 (CSAH 10), connecting to a Great River Energy 115-kV transmission line along Guernsey Avenue. For ease of reference, these Comments will refer to “Route Alternative A (CSAH 10).” A map depicting Route Alternative A (CSAH 10) is included as **Attachment 1**.
- **Route Alternative B** begins at the proposed Laketown Substation and then connects to an Xcel Energy 115-kV transmission line along County Road 140. These Comments will refer to “Route Alternative B (Kelly Avenue).”
- **Route Alternative C** begins at the proposed Laketown Substation and follows the Proposed Route until it reaches an Xcel Energy 230-kV transmission line right-of-way. It then parallels the 230-kV line right-of-way until connecting with a Great River Energy 115-kV line along Guernsey Avenue. These Comments will refer to “Route Alternative C (230-kV Line).”¹ A map depicting Route Alternative C (230-kV Line) is included as **Attachment 2**.

Each route alternative studied in the EA starts at the proposed Laketown Substation but has a different endpoint than the Proposed Route. Route Alternative A (CSAH 10) and Route Alternative C (230-kV Line) both would ultimately connect to the same Great River Energy 115-

¹ Environmental Assessment at II-III (Apr. 8, 2025) (eDocket No. [20254-217369-01](#)) (hereafter “EA”).

kV transmission line as the Proposed Route. Route Alternative B (Kelly Avenue) would connect to a different transmission line than the Proposed Route, a 115-kV line owned by Xcel Energy.

The EA states that the three route alternatives were proposed by members of the public; however, Route Alternative A (CSAH 10) and Route Alternative C (230-kV Line) were first identified by Great River Energy during Project development, prior to submitting its Route Permit Application, and were included in early public outreach regarding the Project. These alternatives were studied in detail in Section 4.3 of the Route Permit Application as the “CSAH 10 Alternative” and the “Xcel Energy Powerline Alternative”, respectively, as “Route Alternatives Considered but Rejected.” In regards to Route Alternative B (Kelly Ave), although this specific alignment was not studied in Section 4.3 of the Application, Great River Energy considered a conceptually similar “route option” which connected to Xcel Energy’s 115-kV transmission line in Section 4.2 of the Application – the same 115-kV line to which Route Alternative B (Kelly Ave) connects: “Interconnecting with Xcel Energy’s 115-kV transmission system that runs east-west along County Road (CR) 140, south of the MVEC-owned existing Augusta Substation and the proposed Laketown Substation site...” As described in the Application, this route option was rejected and not studied further because it would not meet the long-term reliability or transmission planning needs of the Project. These two route alternatives and one route option were ultimately rejected in the Application, and not recommended in Great River Energy’s subsequent Response to Scoping Comments, for the reasons discussed below.

With respect to Route Alternative A (CSAH 10), during scoping, members of the public generally referred to Great River Energy’s CSAH 10 Route Alternative, and it is that alternative that is studied in the EA. Route Alternative B (Kelly Avenue) was discussed conceptually in the Application, and its specific alignment was presented by a member of the public during the scoping

period. No member of the public proposed or expressed a preference for Route Alternative C (230-kV Line) during scoping.

Prior to selecting a proposed route and filing the Application, Great River Energy conducted outreach and detailed analysis regarding the Project's routing. The Applicants respectfully submit that this outreach and analysis, as reflected in the Application and Response to Scoping Comments, is highly relevant to assessing the route alternatives analyzed in the EA and, for this reason, again summarizes that outreach and analysis in these comments.

A. Route Alternative A (CSAH 10) was not selected as the Proposed Route because it would significantly interfere with Carver County's plans for expansion and reconstruction of CSAH 10.

Recognizing that corridor sharing is an important consideration under the Commission's routing criteria, in developing the Project, Great River Energy developed and analyzed a route that would largely follow CSAH 10; this route is Route Alternative A (CSAH 10) studied in the EA. Great River Energy rejected Route Alternative A (CSAH 10) during early Project planning, and as outlined in the Application, due to long-standing plans for the reconstruction/realignment and expansion of CSAH 10, as detailed by Carver County, as well as the proximity of existing residences along CSAH 10. Great River Energy engaged in early and frequent coordination with Carver County officials where Great River Energy provided detailed Project information and Carver County officials communicated plans for CSAH 10.² This played a significant role in route development. Carver County stated that it did not recommend routing along CSAH 10 because it would interfere with the County's published plans to realign and widen that road in the next 5-10 years. The extent of the realignment was shown on Figure 4-3 of the Application, described in Section 4.3 of the Application, and is also presented in Attachment 1 here. Carver County Public

² Application at 4-8.

Works also expressed support for the Proposed Route and indicated that it does not wish the Project to interfere with Carver County's right-of-way requirements for its upcoming improvements to CSAH 10. Route Alternative A (CSAH 10) would cause significant disruptions to the highway project and the operating transmission line when the roadway is expanded. In one location, Carver County is proposing to move the location of CSAH 10 to straighten an existing curve (see Attachment 1). Indeed, here, the Proposed Route, should it be designed to follow existing CSAH 10, would no longer be co-located with CSAH 10 following the improvements. Also shown on Attachment 1 are the current municipal boundaries of the City of Victoria. The location where CSAH 10 connects to CSAH 11 was recently annexed into the City of Victoria. A route along CSAH 10 would result in greater impacts to landowners and residents along this road.

In addition to the planned development and realignment along CSAH 10, Route Alternative A (CSAH 10) was rejected in favor of the Proposed Route because Route Alternative A (CSAH 10):

- Is in closer proximity to more residences than the Proposed Route.
- Crosses more wetlands than the Proposed Route, including one crossing that exceeds 400 feet, meaning that a structure would likely need to be placed in a wetland.
- Would require 12 crossovers of CSAH 10 because of the density of structures that are in close proximity to the highway right-of-way.

Route Alternative A (CSAH 10) would not avoid or minimize impacts as compared to the Proposed Route but would only shift them to an area where there are more landowners, where known development is planned to proceed, across land within the municipal boundaries of the City of Victoria, and over the objection of Carver County.

B. Route Alternative B (Kelly Avenue) was not selected as the Proposed Route because it decreases system reliability.

Great River Energy initially analyzed a similar route option during Project development and in the Route Permit Application, but did not consider or study the configuration further because this configuration would result in an uneven distribution of loading on the electrical system in the area and thus would not meet the identified need as well as the Project's Proposed Route.³ In short, when developing projects, Great River Energy generally rejects configurations that do not improve reliability. Because this configuration, which was studied in the EA as Route Alternative B (Kelly Avenue), makes the existing system less reliable, Great River Energy did not propose it. However, it is studied as Route Alternative B (Kelly Avenue) in the EA.

In the Application, Great River Energy explained that a route option similar to Route Alternative B (Kelly Avenue) was identified but not considered further because it would result in multiple substations, including the proposed new Laketown Substation, to be co-dependent on a single 115-kV circuit. This would result in a higher level of exposure to outages resulting in less reliability.⁴

C. Route Alternative C (230-kV Line) was not selected as the Proposed Route because it would significantly interfere with the City of Victoria's current development.

Recognizing that corridor sharing is an important consideration under the Commission's routing criteria, when developing the Project's proposed route and as part of the Route Permit Application, Great River Energy also analyzed a route following an existing Xcel Energy 230-kV

³ Application at 4-1; Applicants' Scoping Comments at 8-9 (Dec. 4, 2024) (eDocket No. [202412-212706-01](#)).

⁴ See Application at 4-1 (Explaining that Alternative B would "result in a higher level of exposure to outages resulting in less reliability. Therefore, this route option was not considered further.").

line. Great River Energy conducted early outreach to the City of Victoria, aware of the residential developments in the vicinity of the Project. Following study, Great River Energy rejected this route, which is studied in the EA as Route Alternative C (230-kV Line), due to the City of Victoria's concerns that the Project would "severely prohibit development" of an area that has been "highly anticipated for the last few decades to become the commercial hub for the city."⁵ The existing 230-kV line does not follow a road, and the City of Victoria, prior to submittal of the Application, informed Great River Energy that the eastern portion of Route Alternative C (230-kV Line) was located within land on the northwest side of CSAH 10 and CSAH 11 that, at the time, would eventually become part of the City of Victoria through an annexation agreement with Laketown Township. The City of Victoria had plans to develop this property for commercial and industrial use in the near future. Since the submittal of the Application, the City of Victoria has annexed the subject land into the City of Victoria municipal boundaries and a developer is proceeding with a commercial development there. Therefore, as of the time of this filing, Alternative C (230-kV Line) will cross the municipal boundaries of the City of Victoria. Development of this parcel into the "Victoria Crossings" multi-use development has been proceeding over the past several months. As outlined in an Agenda Report for the City of Victoria dated April 28, 2025 (see Attachment 3),⁶ Tradition Development submitted a final plat request for consideration for a 9,100 square foot Kwik Trip convenience store with ten gas pumps and an attached car wash, the first phase of development of this parcel. Detailed drawings for the Kwik Trip and associated roadways are included in the April 28, 2025, Agenda Report, including the location of the existing 230-kV line easement. As proposed, Alternative C (230-kV Line), placed

⁵ Application at 4-9.

⁶ Attachment 3 includes excerpts of this document for ease of reference; the full document is available at <https://victoria.civicweb.net/document/192869/>.

to the north of the 230-kV line easement, would cross directly over the southern portion of the Kwik Trip, including two new roads: “Crossings Parkway [the access point to the Kwik Trip off of County Road 11] and Ridgeview Boulevard,” associated tree plantings along the road, and near the gas pumps. The final plat was approved for the Kwik Trip development on April 28, 2025.⁷

The Kwik Trip gas station is considered “Phase 1” of the proposal to completely develop this annexed parcel. As outlined in a City of Victoria Agenda Report from January 7, 2025⁸, Tradition Companies has stated its intent to develop the remainder of the parcel in one or two additional phases as “end users purchase parcels within the development.” A map on page 15 of the Agenda Report (*see* Attachment 3) describes an initial proposal for further development, including building collector roadways (with a possible connection to CSAH 10), utilities, and potential future commercial/retail, dining, and high-density residential and senior living facilities. Therefore, adjustment of the location of the Route Alternative C (230-kV Line) alignment to any other location on this parcel to avoid Kwik Trip would likely intersect with future development plans. Although a 115-kV line is not incompatible with these types of facilities as a general rule, the state of the development of this parcel has proceeded without consideration of this potential transmission line easement, and the Kwik Trip may be constructed and in operation before construction of the Project commences. It is not clear how the alternative as analyzed could proceed, knowing the roadway and structural constraints along its path.

Moreover, at the time of the Application, there were also two residential subdivisions under development to the north of Route Alternative C (230-kV Line) – Huntersbrook and Marsh

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https://ci.victoria.mn.us/news_detail_T3_R274.php#:~:text=Addition%20Residential%20Development.-,Community%20Impact,located%20in%20Victoria%20South%20Growth.

⁸ <https://victoria.civicweb.net/document/190669/>

Hollow, as shown on Attachment 2. One additional subdivision, Victoria Ridge - was also in early planning stages – just to the north of Route Alternative C (230-kV Line).⁹ Since submittal of the Application, an additional development proposal has come before the City of Victoria. On March 24, 2025, a City of Victoria Agenda Report presented a sketch plat request for West Creek Village, a residential development that presently includes 56 row townhomes, 18 twinhomes; and 36 single-family homes. This area is not currently within the City of Victoria municipal boundaries and would require annexation to become part of the city. Presently, as shown on page 144 of 147 of the March 24, 2025, Agenda Report (see Attachment 4)¹⁰ the existing 230-kV line crosses this property, but the initial plan has been designed to accommodate the existing line by planning homes to the north of the line and maintaining wetlands and stormwater ponds under the line. Just north of the existing 230-kV line, however, preliminary plans show a series of residential lots that comprise the subdivision, traveling north to the top of the parcel. Depending on ultimate right-of-way width, Alternative C (230-kV Line) would cross directly over the southernmost planned lots. Moving the Route Alternative to another location on the tract, such as south of the existing 230-kV line, would impact an existing residential property not included in the West Creek Village development plans.

The existing 230-kV line, at the time it was developed, was a cross-country route through agricultural properties. Great River Energy's initial review of this route alternative in the Application identified the current and ongoing development in this area and the potential constraints. These constraints have only become clearer as time has passed since the Application was filed. A new right-of-way along the existing line, within areas that are currently being

⁹ Application at 4-10.

¹⁰ Attachment 4 includes an excerpt from this report for ease of reference. The full document is available at <https://victoria.civicweb.net/document/192256/>.

developed, would introduce new and unique routing constraints not experienced along the Proposed Route, and at the objection of the City of Victoria.

II. ROUTE ALTERNATIVE ANALYSIS.

Considering the information included in the Application and Response to Scoping Comments, as well as additional analysis conducted by Great River Energy, the Applicants offer the additional comments below regarding resources and topics for which, in the Applicants' view, there are material differences among routes.

A. Reliability.

Statute and rule require the Commission to evaluate reliability when selecting a route. Minn. Stat. § 216E.03, subd. 7(b)(13); Minn. R. 7850.4100(K) (requiring consideration of "electrical system reliability"). Likewise, reliability is a critical consideration in the Applicants' analysis of potential projects. Here, there are material differences in reliability between the Proposed Route and Route Alternative B (Kelly Avenue). The Applicants rejected a route option similar to Route Alternative B (Kelly Avenue) in the Application, opposed this specific route alternative's inclusion in the EA, and continue to assert that this alternative would reduce the reliability of the system.

As part of its analysis of potential projects, Great River Energy considers whether a given configuration will make the system more reliable, or less reliable, and does not make a practice of pursuing configurations that do not improve reliability. Here, although Route Alternative B (Kelly Avenue) would serve the Laketown Substation (as would all the routes studied in the EA), this alternative does not improve the reliability of the transmission system and will in fact increase the load exposure on the transmission line due to the addition of the Laketown load on the same circuit as Augusta and Victoria. EERA asked the Applicants to provide a reliability analysis for Route Alternative B (Kelly Avenue), which is attached to the EA as Appendix C. As detailed in Appendix

C of the EA, Route Alternative B (Kelly Avenue) would result in an uneven distribution of loading on the electrical system in the area, which would result in a higher level of exposure to outages and a higher likelihood of multiple substations lost in the event of a fault on the system. In contrast, the other routes analyzed in the EA (including the Proposed Route) provide balanced load distribution for end-users and ensure enhanced reliability and resiliency.

For Route Alternative B (Kelly Avenue) to achieve the same level of reliability as the Proposed Route, a new breaker station would need to be installed on the existing line between Augusta and Victoria. This would require a new approximately 20-acre greenfield breaker station site that would need to be purchased from a private landowner and would cost approximately \$8-10 million.¹¹ A potential location for this breaker station, and the impacts associated with such a site, were not studied in the EA, nor has a site been identified by Great River Energy because it is not proposed as part of this Project. In contrast, the configuration of the Proposed Route allows the breaker to be installed at the Laketown Substation, rather than at a separate site.

For any project, although it may be possible in many cases to draw a shorter route, an analysis of potential impacts for such a route is secondary if the route makes the system less reliable, as compared to other alternatives.¹² As noted above, to achieve the same level of reliability as the Proposed Route, an additional breaker station would be required, with related environmental impacts at an approximately 20 acre site, and increased costs of approximately \$8-10 million. When the entirety of potential impacts is considered, the Proposed Route compares favorably as

¹¹ Actual costs may vary and depend upon land acquisition costs and material procurement.

¹² For these reasons, the remainder of Applicants' Comments largely focus on the Proposed Route, Route Alternative A (CSAH 10), and Route Alternative C (230-kV Line).

compared to Route Alternative B (Kelly Avenue) because it both enhances system reliability and minimizes potential human and environmental impacts.

B. Land use & zoning.

In Chapter 4, the EA analyzes land use and zoning for each route alternative. In these Comments, the Applicants provide more detail regarding each route's potential impacts on land use and zoning. There are material differences among the routes, and the Proposed Route ultimately compares favorably.

1. Proposed Route.

As discussed in detail in the Application, the Project Area consists largely of agricultural and rural/transitional development land use patterns.¹³ The Proposed Route will result in minimal impacts to land use and zoning, and construction of the Project will not change land uses, particularly where the Project will be located with existing utility and road right-of-way. Short term agricultural impacts might occur during construction, which will be mitigated through restoration and compensatory payments. There will be permanent structures within agricultural fields, and Great River Energy will coordinate the placement of the structures with the landowner to the extent possible.¹⁴

Furthermore, the Project is a 115-kV transmission line – a common feature in communities and operating in conjunction with homes, businesses, and industry and is not inconsistent with the rural character of the Project Area. The EA recognizes that “impacts are anticipated to be minimal, if it all, since HVTTL does not have a large potential to change underlying land use,” and also that

¹³ Application at 6-21.

¹⁴ Application at 6-22.

“[i]nterference with county zoning ordinances is not expected.”¹⁵ A 115-kV transmission line is needed to serve local load, especially when the surrounding communities have noted plans for expansion and continued development of residential and industrial areas. The Project and Proposed Route will support that continued development and increased load, and the Proposed Route was designed such that it is consistent with future development.

The Applicants are aware that the City of Carver has identified a portion of the route for potential future annexation into the City, with subsequent development. As stated in Great River Energy’s Response to Scoping Comments, according to an August 2018 map provided by the City of Carver, the Project would cross 1.7 miles of land that is outside the city but within the City of Carver’s “ultimate growth boundary,” 1.5 miles of which is identified with the future land use type of “low density residential” and 0.2 mile of which is along Hampshire Road, identified with the future land use type of “commercial/industrial.” This land has not yet been annexed and remains outside City boundaries. The Applicants met with the City of Carver most recently on May 7, 2025, to discuss the Project and the EA. As a result of that meeting, the Applicants understand that the City of Carver’s position on the Project remains unchanged, and that there are no near-term plans for annexation or development in the vicinity of the Project.

More specifically, the City of Carver 2040 Comprehensive Plan notes that the area where the Project is proposed to occur is estimated to be developed/grow in the post-2040 timeframe, based on expected growth patterns. The Project as proposed would be compatible with all current and future land use types considered by the City of Carver for potential future annexation in this area, including agriculture, low density residential, and/or commercial/industrial. As shown by Great River Energy’s existing 115-kV infrastructure in the areas experiencing growth within and

¹⁵ EA at IV.

adjacent to the City of Victoria as discussed above, 115-kV systems do exist in areas with similar zoning, and the Proposed Route does not preclude future development along this route. Rather, the timing of the Project (now) and potential future development (approximately 15 years in the future, based on the 2040 Comprehensive Plan's post-2040 growth timeline) is compatible, such that the Project's Proposed Route does not interfere with identified planned developments. As stated in the Response to Scoping Comments, 115-kV service is critical to reliable service, and should the areas considered by the City of Carver be annexed for growth and development down the road, the 115-kV system put in place as part of the Project will support that growth, and growth can proceed around the transmission line.

2. Route Alternative A (CSAH 10).

As detailed in the Application and as the EA recognizes, Carver County has long opposed Route Alternative A (CSAH 10) due to the planned highway improvement project along CSAH 10 in the coming years.¹⁶ The EA acknowledges that Route Alternative A (CSAH 10) may result in "some interference with planning of future development along CSAH 10", but this understates the degree of impact that the Route Alternative would cause.¹⁷ More specifically, Carver County plans to expand the roadway to a four lane divided highway, realign, and relocate portions of CSAH 10 in the 5 to 10 years. A detailed explanation of these changes was included in Section 4.3.2 of the Application. Great River Energy understands that final highway plans are still under development. As such, attempting to design the Project's alignment around preliminary future highway modification designs would involve speculation and could still require structures built by Great River Energy to be relocated, depending on final plans. If Great River Energy placed the

¹⁶ Application at 4-8; EA at 31.

¹⁷ EA at 32.

Project along portions of the existing road that were removed and relocated in the future, as shown on Attachment 1, then the Project would no longer be co-located after the move.

Even if the highway plans were final, aligning the Project along the changed right-of-way would result in more impacts to residential landowners along CSAH 10 as compared to the Proposed Route. Not only would affected landowners be subject to two major construction projects in the course of several years, but the Project's alignment would need to be shifted closer to 13 existing homes that are located within 200 feet. The density of residential homes and businesses on either side of the highway would require that Great River Energy make several crossings of the road to avoid impacts to existing structures and provide proper setbacks (see Attachment 1). Great River Energy would need to make 12 crossovers of CSAH 10 because of the density of structures that are close to the highway ROW.

The Applicants have continued to coordinate with Carver County throughout this process and will meet with the County the week of May 12, 2025, to discuss the Project and the EA.

3. Route Alternative C (230-kV Line).

The EA states that Route Alternative C (230-kV Line) “minimizes impacts to future land use and zoning, as it is fairly compatible with industrial development in the city of Victoria.” This conclusion simplifies the level of impact that the Route Alternative would have on planned development and is counter to the City of Victoria's position on the Project, as reflected in the Application:

On January 22, 2024, the City of Victoria notified Great River Energy that this Route Alternative is located within land that will eventually become part of the City of Victoria through an annexation agreement with Laketown Township, and that the City would like to develop this property for commercial and industrial use in the near future. The City's position is that the presence of the transmission line and ROW building restrictions would deter such development (see correspondence in Appendix E). Great River Energy later met with the City of Victoria on February 22, 2024, to

discuss the Project, and the City of Victoria submitted a letter to Great River Energy on February 27, 2024. The City of Victoria restated its concerns that many of the properties crossed by the Xcel Energy Powerline Alternative are “within the future commercial and flex-employment growth areas for the city. These properties have been highly anticipated for the last few decades to become the commercial hub for the city. An additional power line and easement adjacent to the existing Xcel Energy power line and easement would severely prohibit development of this highly anticipated growth area.”¹⁸

Further, since the Application was filed, development in the City of Victoria has continued to proceed with development in this area as outlined in Section I.C, above, and these development plans did not contemplate the presence of an additional transmission line right-of-way intersecting development properties. Development plans have progressed to the point where commercial structures, such as the Kwik Trip gas station, have been approved by the City of Victoria and will be directly impacted by the Route Alternative. Based on the approved plats for the Kwik Trip gas station, the Project as proposed would likely be incompatible with the approved plat.

Although a 115-kV line is not inconsistent with residential, commercial, and industrial development, compatibility requires appropriate sequencing and planning. The City of Victoria already made the Applicants aware of near-term planned development near Route Alternative C (230-kV Line). At that time, the near-term development was progressed such that adding a 115-kV right-of-way would have required modifications to those plans. Now, those developments have only continued to proceed, as the City of Victoria indicated they would, and the Route Alternative would conflict with approved plats for the Kwik Trip gas station. In contrast, because they are no pending near-term developments along the Proposed Route, the Project would not require modifications to existing development plans if the Proposed Route were selected.

¹⁸ Application at 4-9.

The Applicants have continued to coordinate with the City of Victoria throughout this process regarding the EA and the Project. Most recently, the City of Victoria submitted written comments on May 7, 2025, reiterating the City's position on Route Alternative C (230-kV Line).

Overall, the record shows that the Proposed Route will not preclude future development, and that conclusion is correct when considering appropriate sequencing and planning (i.e., a 115-kV line is not incompatible with residential, commercial, and industrial development when planned prior to that development). Route Alternative C (230-kV Line) would impact present development that did not consider the presence of a new transmission line when undergoing its planning efforts. Accordingly, Applicants do not agree with the EA's statement that potential conflicts with existing land uses are most likely to occur on the Proposed Route. As these comments show, Route Alternative A (CSAH 10) and Route Alternative C (230-kV Line) have greater potential conflicts with existing land use. There are no equivalent land use conflicts present along the Proposed Route.

C. Public utilities & infrastructure.

In Chapter 4, the EA analyzes the potential impacts of the Proposed Route and route alternatives on public utilities and infrastructure and generally appears to conclude that impacts would be similar across route alternatives. However, as discussed in Section I.C above, the record reflects that Route Alternative A (CSAH 10) will have additional impacts on road infrastructure, as compared to the other routes evaluated in the EA.

D. Residences.

The EA analyzes potential Project impacts to residences primarily by evaluating proximity to residences. The EA concludes there are eight residences within 200 feet of the Proposed Route, 13 residences within 200 feet of Route Alternative A (CSAH 10), five residences within 200 feet of Route Alternative B (Kelly Avenue), and three residences within 200 feet of Route Alternative

C (230-kV Line). A simple comparison of the number of homes within 200 feet does not convey the impact that the Route Alternatives would have on residences. The Applicants offer the following unique additional impacts of each Route Alternative for the benefit of the record:

- **Route Alternative A (CSAH 10):** As described in Section II.B.2, this alternative would impact the highest number of residences. Road expansion and realignment would push the transmission line even closer to more residences. Highway modification plans by Carver County would result in cumulative impacts on those landowners should a transmission line be built along the road, then moved to accommodate a potential four-lane divided highway. The density of residential homes and businesses on either side of the highway would require that Great River Energy make 12 crossings of the road to avoid impacting existing structures and provide proper setbacks.
- **Route Alternative B (Kelly Avenue):** The EA states that there is one home within 50-100 feet of Route Alternative B, which is closer than any residence along the Proposed Route. In addition, as outlined in Section II.A, this alternative would require a new approximately 20-acre greenfield breaker station site, resulting in permanent aboveground facility impacts that would not occur under the Proposed Route. The specific location of the breaker station has not been studied.
- **Route Alternative C (230-kV Line):** The EA states that “Route Alternative C is near the fewest residences.” Although this may presently be the case, the EA does not reflect the residential development proposed for the community of West Creek Village, a residential development that presently includes 56 row townhomes, 18 twin homes; and 36 single-family homes (see Section I.C.). Route Alternative C would presently cross the southern portion of this planned development where multiple residential lots have been proposed (see Attachments 2-4).

The EA states that aesthetic impacts are anticipated to be “moderate” for all routes, “but possibly higher for the Applicants’ Proposed Route” and that “[o]n whole, Route Alternative C minimizes aesthetic impacts.” For the reasons set forth in this section, however, the Applicants respectfully disagree with this conclusion; instead, the analysis reflects that the Proposed Route best minimizes potential residential and aesthetic impacts.

E. Vegetation.

The EA states that impacts to vegetation are anticipated to be “moderate” for the Proposed Route and “minimal” for the other route alternative evaluated, stating that “more than twice as much tree clearing would be necessary” for the Proposed Route. However, it is important to contextualize potential impacts. The EA concludes that the Proposed Route is anticipated to clear less than two acres of vegetation, as compared to less than one acre for other alternatives. These potential impacts are minimal and comparable across alternatives.¹⁹

Further, although the EA states that there will be no tree-clearing for Route Alternative B (Kelly Avenue), there are several areas with trees along Kelly Avenue and Augusta Road that would be crossed by the Project.

F. Existing rights-of-way, survey lines, natural division lines, and field boundaries.

The EA concludes that the route alternatives are more co-located with existing infrastructure than the Proposed Route, referring to “utilities and roads.”

Great River Energy sought to co-locate the Project with existing rights-of-way but found that co-location like that reflected in Route Alternatives A and C would result in more significant human and environmental impact than the Proposed Route would. The Proposed Route seeks to balance maximizing co-location while minimizing impact. Co-location does not always result in the least impactful route. Route Alternative C (230-kV Line), for example, involves co-locating with the existing 230-kV line. This line is cross-country (i.e., does not follow a road), and therefore, placing another right-of-way along that existing line would increase the magnitude of potential

¹⁹ See, e.g., *In the Matter of the Application for a Route Permit for the Alexandria to Big Oaks 345- kV Transmission Project in Central Minnesota*, Docket No. ET10/TL-23-159, EA at 9-10; 163 (May 29, 2024) (describing vegetation impacts as “minimal” for routes resulting in forested area clearings between 4.67 acres and 8.47 acres).

impact, particularly considering the ongoing development directly adjacent to the existing line. Approximately 53.5 percent of the Proposed Route is co-located, which was developed after careful consideration of relevant routing factors.²⁰

The Proposed Route also avoids impacting the planned CSAH 10 highway improvements that would result from Route Alternative A (CSAH 10), and it avoids impacting land that the City of Victoria has already planned to host future commercial, industrial, and residential developments caused by Route Alternative C (230-kV Line). As compared to the route alternatives, the Proposed Route has the support of the City of Victoria as well as Carver County.²¹

G. Wetlands.

As the EA notes, Route Alternatives A (CSAH 10) and C (230-kV Line) cross both the most acres of emergent wetlands, and the most acres of forested wetlands.²² Based on the Applicants' review, these routes would require the placement of structures within wetlands. The EA further concludes that "The Applicants' Proposed Alignment would impact the least area of wetlands."²³ Based on the Proposed Alignment, Great River Energy does not anticipate pole placement within wetlands.²⁴ Therefore, both the Application and the EA support the Proposed Route because it minimizes wetland impact.

H. Agriculture.

The EA notes that "HVTLS generally do not interfere with future farming or grazing operations," and that potential on-the-ground impacts and short- and long-term financial impacts,

²⁰ Application at 3-1-3-2.

²¹ Application at 4-11.

²² EA at 70.

²³ EA at 88.

²⁴ Application at 6-35.

such as crop losses, can be mitigated through easement agreements.²⁵ Indeed, the EA concludes that impacts to agricultural land are expected to be minimal for all routing options.²⁶ Despite this conclusion, the EA finds that the Proposed Route will be more impactful than Route Alternatives A (CSAH 10) and C (230-kV Line). Great River Energy respectfully disagrees with this finding. A transmission line right-of-way is consistent for use as pasture, hay, or other crop cultivation. As noted in the Application, Great River Energy will work with landowners to minimize impacts to agricultural activities along the Proposed Route and will compensate landowners for any crop damage/loss and soil compaction that may occur during construction. Areas disturbed during construction will be repaired and restored to pre-construction conditions as required so that all surfaces drain naturally, blend with the natural terrain, and are left in a condition that will facilitate natural revegetation, provide for proper drainage, and prevent erosion.²⁷ Moreover, the draft route permit provides for construction and operational conditions that minimize impact to agricultural land.

I. Alignment Alternative D.

Alignment Alternative D was proposed by the public through the scoping process. The route follows the Applicants' Proposed Route, differing only at a portion south of Augusta Road and west of CSAH 43.

Alignment Alternative D is less co-located than the Proposed Route Alignment,²⁸ it has a greater potential for indirect impacts to surface waters,²⁹ it crosses the most acres of emergent

²⁵ EA at 86.

²⁶ EA at 97.

²⁷ Application at 6-23.

²⁸ EA at 85.

²⁹ EA at 97.

wetlands,³⁰ and it does not utilize any existing infrastructure.³¹ This alignment would result in structures within a wetland—both temporary and permanent wetland impacts.

Overall, the Applicants take no position on Alignment Alternative D.

III. OTHER COMMENTS.

Applicants also submit the following discrete comments on specific text in the EA:

Reference (page)	Topic	Comment
10	Potential Permits	The Project will not cross a Waterfowl Production Area, so no special use permit from U.S. Fish and Wildlife Service is required.
15	Distribution	The EA states that “[p]ortions of the project may have distribution lines ‘underbuilt’ onto the pole structures.” The Applicants clarify that, as stated on page 6-7 of the Application, existing distribution lines will either be under-built or buried, based on coordination with the distribution owner.
20	Regions of Influence	Clarification that the anticipated right-of-way will be 50 feet <i>on either side of the anticipated alignment</i> .
32	Zoning	The EA states that a transmission line “might interfere with the underlying zoning designation” of a property. However, the zoning authority determines the appropriate zoning designation for a property, and the presence of a 115-kV transmission line does not change a property’s zoning designation.
55	Tourism	The EA states that impacts to tourism are expected to be “long-term.” However, the remainder of analysis notes that the Project avoids public lands and tourist areas, and that the Project will not preclude tourist activities.
82	Rare Plants	The EA refers to surveys for rare plants. To clarify, as noted in the EA, rare plants are not anticipated in the right-of-way. Likewise, no resource agency has requested such surveys.
91	Future Projects	When considering the future projects, it is helpful to also understand the timing of those

³⁰ EA at 87.

³¹ EA at 97.

Reference (page)	Topic	Comment
		projects. Land development in and outside the City of Victoria is happening now and is ongoing. The Applicants are not aware of any near-term development in the vicinity of the Project and the City of Carver. Based on information from Carver County, Carver County's plans for CSAH 10 would occur in 5-10 years.

CONCLUSION

Applicants appreciate the opportunity to submit these comments on the EA. The Applicants respectfully submit that the Proposed Route meets the Commission's routing criteria and is the best route for the Project, considering reliability, human, and environmental factors.

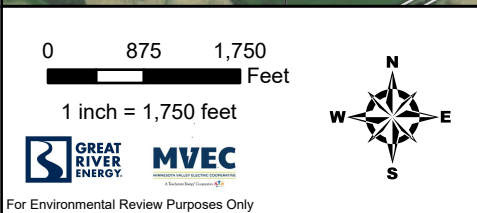
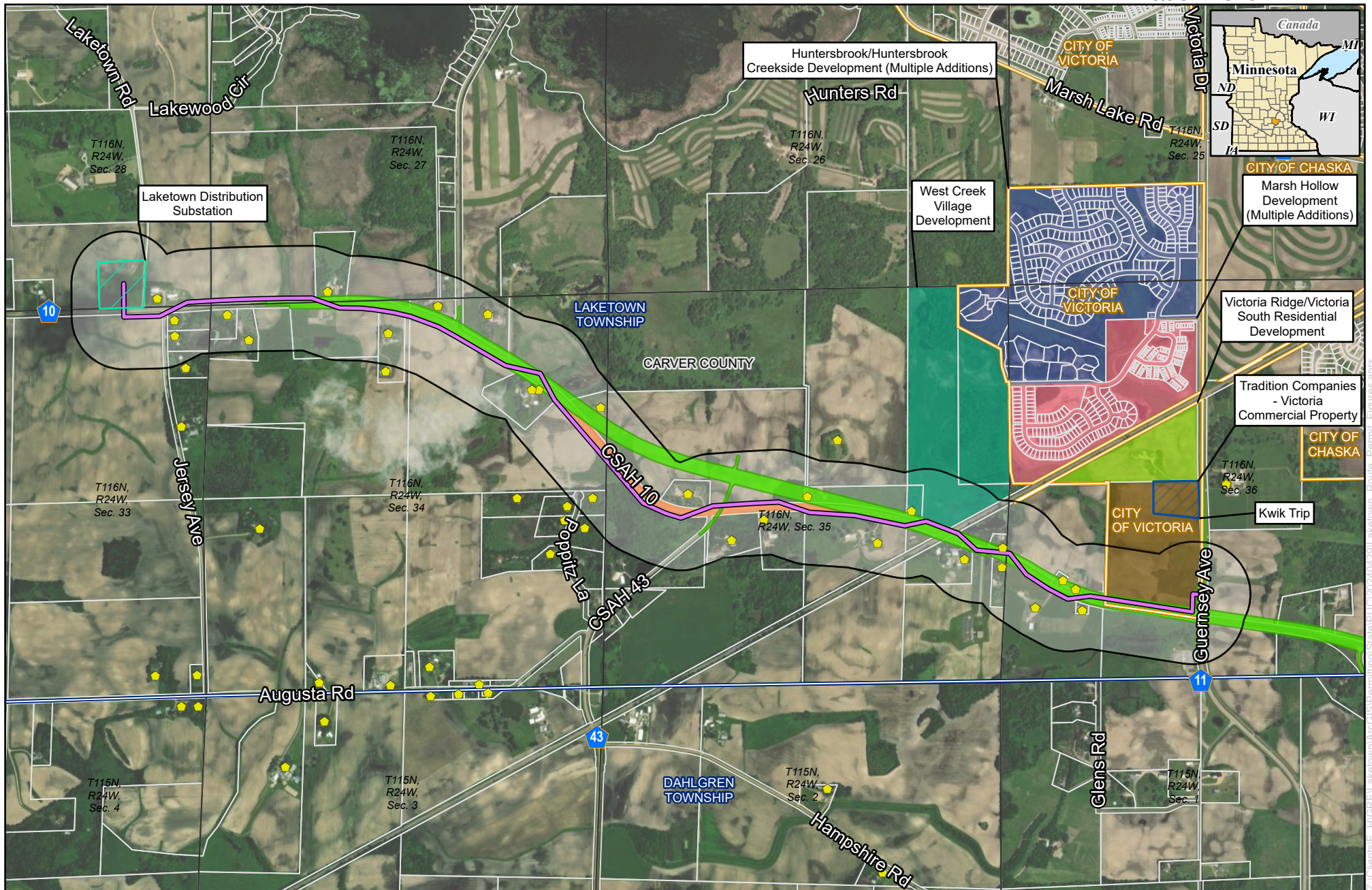
Dated: May 13, 2025

Respectfully submitted,

s/ Haley Waller Pitts

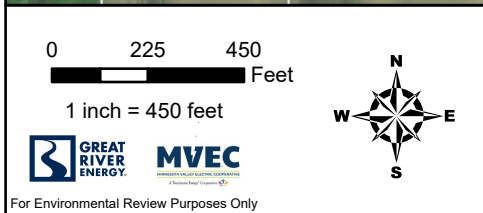
Haley L. Waller Pitts (# 393470)
FREDRIKSON & BYRON, P.A.
60 South Sixth Street, Suite 1500
Minneapolis, MN 55402-4400
Telephone: (612) 492-7000
Fax: (612) 492-7077

Attorney for Applicants



Attachment 1 **Laketown 115-kV Transmission Line Project** **Route Alternative A Constraints** **Carver County, Minnesota**

- | | | |
|---|--|---|
| <ul style="list-style-type: none"> Route Alternative A Substation Parcel Boundary Route Width Improvement: Highway 10 Western Subarea - West CSAH 10 Present Location Kwik Trip | <ul style="list-style-type: none"> Huntersbrook/Huntersbrook Creekside Development (Multiple Additions) Marsh Hollow Development (Multiple Additions) Victoria Ridge/Victoria South Residential Development Tradition Companies - Victoria Commercial Property | <ul style="list-style-type: none"> West Creek Village Development Residence Parcel Boundary Section Boundary City Boundary Township Boundary County Boundary |
|---|--|---|



Attachment 2

Laketown 115-kV Transmission Line Project

Route Alternative C Constraints

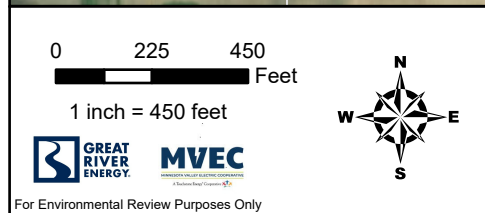
Carver County, Minnesota

Page 1 of 5

Substation Parcel Boundary	Parcel Boundary
Route Alternative C	Section Boundary
100' Right-of-Way	City Boundary
Route Width	County Boundary
Residence	



<p>0 225 450 Feet</p> <p>1 inch = 450 feet</p> <p>GREAT RIVER ENERGY</p> <p>MVEC</p> <p>For Environmental Review Purposes Only</p>	<h2 style="text-align: center;">Attachment 2</h2> <h3 style="text-align: center;">Laketown 115-kV Transmission Line Project</h3> <h4 style="text-align: center;">Route Alternative C Constraints</h4> <h4 style="text-align: center;">Carver County, Minnesota</h4> <p style="text-align: center;">Page 2 of 5</p>	<table border="0"> <tr> <td></td> <td>Route Alternative C</td> <td></td> <td>Residence</td> </tr> <tr> <td></td> <td>100' Right-of-Way</td> <td></td> <td>Parcel Boundary</td> </tr> <tr> <td></td> <td>Route Width</td> <td></td> <td>Section Boundary</td> </tr> <tr> <td></td> <td>230-kV Transmission Line</td> <td></td> <td>City Boundary</td> </tr> <tr> <td></td> <td>Existing Right-of-Way</td> <td></td> <td>County Boundary</td> </tr> </table>		Route Alternative C		Residence		100' Right-of-Way		Parcel Boundary		Route Width		Section Boundary		230-kV Transmission Line		City Boundary		Existing Right-of-Way		County Boundary
	Route Alternative C		Residence																			
	100' Right-of-Way		Parcel Boundary																			
	Route Width		Section Boundary																			
	230-kV Transmission Line		City Boundary																			
	Existing Right-of-Way		County Boundary																			



Attachment 2

Laketown 115-kV Transmission Line Project

Route Alternative C Constraints

Carver County, Minnesota

Page 3 of 5

	Route Alternative C		Residence
	100' Right-of-Way		Parcel Boundary
	Route Width		Section Boundary
	230-kV Transmission Line		City Boundary
	Existing Right-of-Way		County Boundary



Attachment 2

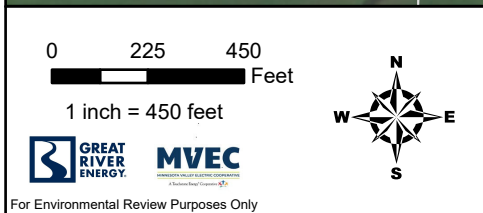
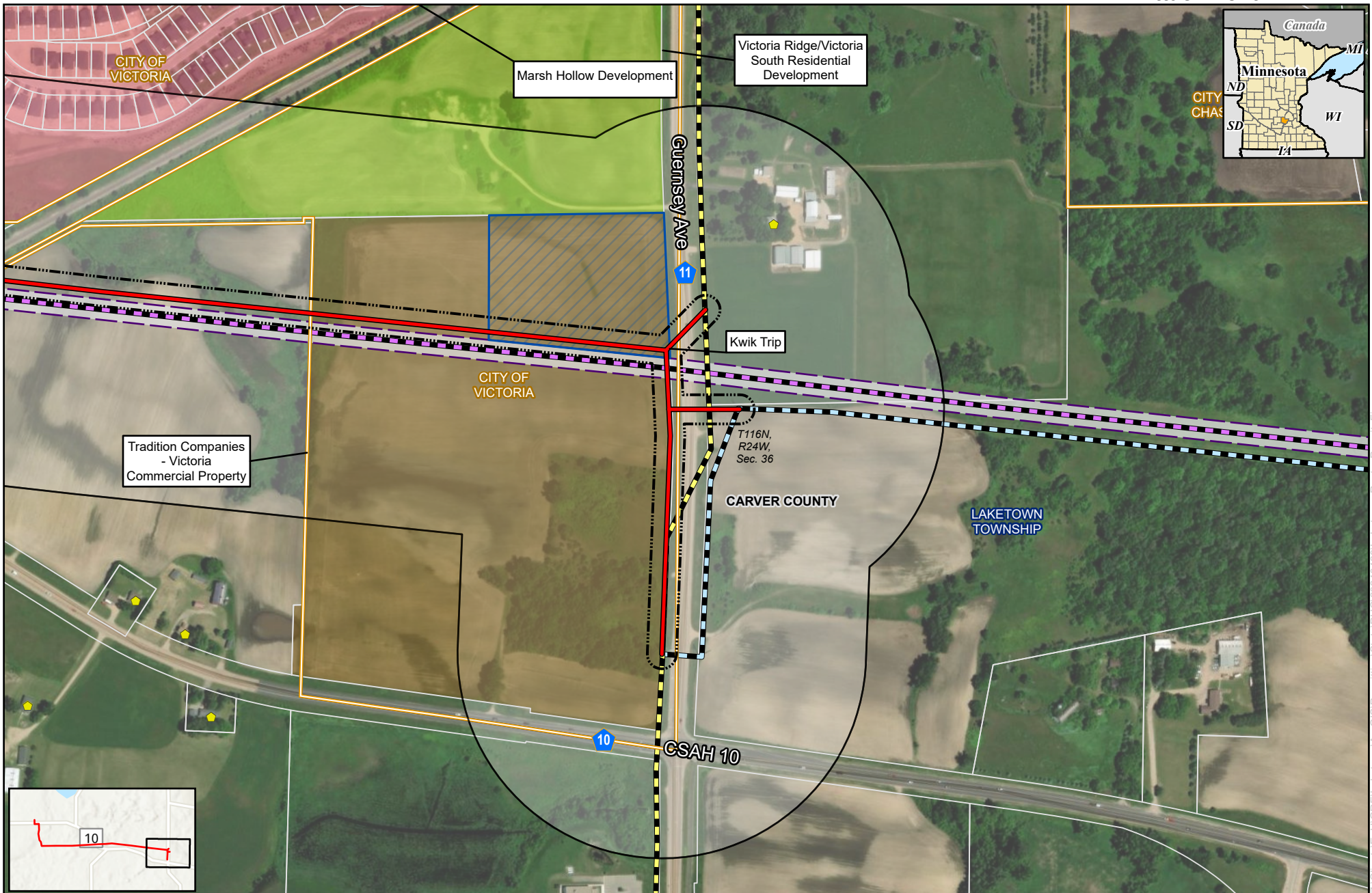
Laketown 115-kV Transmission Line Project

Route Alternative C Constraints

Carver County, Minnesota

Page 4 of 5

- | | | |
|--------------------------|--|--------------------------------|
| Route Alternative C | Residence | West Creek Village Development |
| 100' Right-of-Way | Huntersbrook/Huntersbrook Creekside Development (Multiple Additions) | Parcel Boundary |
| Route Width | Marsh Hallow Development (Multiple Additions) | Section Boundary |
| 230-kV Transmission Line | City Boundary | County Boundary |
| Existing Right-of-Way | | |



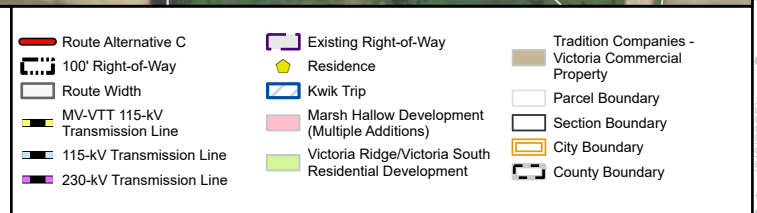
Attachment 2

Laketown 115-kV Transmission Line Project

Route Alternative C Constraints

Carver County, Minnesota

Page 5 of 5





City of Victoria

AGENDA REPORT

Regular Council Meeting - Apr 28 2025

Agenda Item: Consider a Final Plat and Rezoning for Kwik Trip
Staff/Department: Brian McCann City Planner - Community Development

BACKGROUND INFORMATION:

Applicant: Tradition Development (the "Applicant") on behalf of ECC Land Holdings LLC (the "Property Owner").

Location: The Subject Property consists of a portion of a single parcel (PID:070350100) consisting of 4.14 acres, which is located north of County Road 10, west of County Road 11, south of the Victoria Ridge development and the adjacent railroad. The entire parcel originally consisted of approximately 78.39 acres but was recently split between the north and south sides of the railroad tracks. The portion that was recently annexed is approximately 48 acres in size, and includes the Subject Property considered for development.

Synopsis: The Applicant has submitted a final plat request for consideration by the Planning Commission and City Council for a 9,100 square foot Kwik Trip convenience store with 10 gas pumps and an attached car wash on a 4.14-acre parcel. The request includes a Rezoning to change the zoning from Agricultural to C-2 Community Commercial District.

Existing Conditions

The site currently consists of vacant farmland with some slight elevations. There are also power lines with a large easement running through a significant portion of the South Growth area, adjacent to the site.

Previous Reviews

The Applicant previously submitted a sketch plat application and exhibit to receive feedback from the Planning Commission during their regular meeting on [August 20, 2024](#), and the City Council during their regular meeting on [August 26, 2024](#).

The Planning Commission reviewed the preliminary plat and associated applications during their regular meeting on [January 7th, 2025](#) and the City Council approved the requests during their regular meeting on [January 27th, 2025](#) including submittal of a Comprehensive Plan Amendment and Conditional Use Permits for the accessory gas pumps and car wash.

Rezoning

The Applicant received annexation approvals from the City of Victoria and Laketown Township. Upon annexation, the property automatically established an Agricultural zoning classification. The Applicant is proposing to rezone the property from Agricultural to C-2 Community Commercial District as part of their preliminary plat submittal.

The Applicant has applied for rezoning to the C-2 Community Commercial Zoning District with consideration by city staff. Community Commercial will focus on uses that serve the community as a whole, and does not have a negative impact adjacent residential developments. The following bulk

standards are outlined in [Zoning Code Section 27-8](#) and were reviewed against the proposed development. The lot and principal building appear to meet all the minimum requirements as shown below:

	Min. Lot Area	Min. Lot Front.	Min. Lot Depth	Max. Imp.	Max. Height	Front/Rear Setback	Side/Corner Setback	Bldg. Sep	Res. Setback
C-2 District	0.5 acres	100'	150'	80%	50'	20'/20'	10'/20'	20'	30'
Proposal	4.14 acres	368'	373'	46%	<50'	>20'/>20'	>10'/>20'	<60'	50'

Comprehensive Plan Amendment

The 4.14-acre area of the property is currently guided as Flex-Employment in the 2040 Comprehensive Plan. Based on past guidance from the Metropolitan Council, the proposed use would be required to match future land uses with proposed uses, i.e. commercial structure with Commercial land use designation. The Flex-Employment future land use classification is reserved for business park type uses, not a convenience store.

The Applicant received City Council authorization for a Comprehensive Plan Amendment, which has been submitted to the Metropolitan Council. At the time of writing this case, the amendment has not been formally approved but is anticipated to be approved by the City Council's meeting on April 28th, 2025, where they will consider the final plat and rezoning requests.

Proposed Site Layout

The submitted final plat proposes the principal building central to the site with a car wash on the north side. The gas pumps are located near the southern entrance with guest parking areas adjacent to the building and on the eastern portion of the site. Another access is proposed on the west side of the site with access to the north/south collector road through the Victoria Ridge development. The southern access connects to Crossings Parkway which is anticipated to be a commercial collector road extending from CSAH 11 (Victoria Drive) from the east, down to CSAH 10 (Engler Boulevard) to the south.

City Staff previously requested a right-in only for the southern access into the Kwik Trip due to anticipated concerns with full commercial buildout of the approximate 90-acre commercial area. With a single full access point for the entire region along County Road 11, stacking is expected along Crossings Parkway which will create safety concerns with customers exiting the Kwik Trip site from the southern access point. A condition of preliminary plat approval places the liability of potential intersection upgrades on Kwik Trip, in the event that there are increased warrants for a right-in only at the southern entrance. The condition is also noted in the proposed conditions below.

Architectural, Signage, and Lighting Review

The Applicant has not provided renderings for consideration but they will be reviewed accordingly when submitted for a Site Plan & Building Materials application which will be reviewed by the Planning Commission and City Council. When provided, City Staff will review the renderings in conformance with commercial design standards.

Signage renderings were provided and generally appear to be in conformance with [Zoning Code Section 21 - Sign Regulations](#). Illuminated signage is proposed which requires a Conditional Use

Permit. It's anticipated that the Applicant will amend their Conditional Use Permit to allow illuminated signage when they submit for a Site Plan & Building Materials review.

Street lights are indicated on the site plan along the roads at major intersections. A photometric plan will also be provided with a Site Plan & Building Materials application to determine sufficient site lighting for parking and pedestrian areas. Lighting standards for commercial areas should also be in conformance with [Zoning Code Section 27-9](#).

Landscape and Tree Preservation Requirements

The following standards are from [Zoning Code Section 33 - Landscape and Open Space Requirements](#):

- **Open Space:** There is a minimum 30% open space for Commercial Zoning Districts. This calculation does not include sidewalks or trails. Buffer areas can count towards this but they must be established as outlots. Based on the proposal, there is approximately 50% open space with the proposed development site.
- **Plantings:** 1 tree and 1 shrub for every 1,000 feet of required open space is required for the proposed development. The proposed landscape plan appears to meet this requirement.
- **Boulevard Trees:** Boulevard trees are required along the front or rear yards adjacent to right-of-way every 45 feet, and every 35 feet for secondary front yards on corner lots. The trees must be placed a minimum of 25 feet from intersections. These requirements appear to be met.
- **Foundation Plantings:** These are required along the foundations of commercial buildings which will be evaluated with a Final Plat submittal with a Site Plan & Building Materials application.
- **Buffers:** A 30' buffer is required between Commercial and R-4 zoning districts and has been provided on the plan. The City Council approved a reduction in the required buffer to allow an additional fire lane north of the car wash.
- **Off-Street Parking:** These areas shall have terminal landscaped islands and parking spaces must be screened appropriately from streets. These requirements are also met.
- **Tree Preservation:** There are no trees on this portion of the parcel, so a Tree Preservation plan and evaluation is not required.

Parkland Dedication

The City of Victoria requires parkland dedication for commercial developments over one acre in size. If the Applicant is requesting a cash fee in lieu of land contributions, the acreage is multiplied by the calculated fee per acre of land in the city's fee schedule, which is \$105,000 per acre. The following breakdown is representative of the City of Victoria's 2025 fee schedule and is subject to change for future years: 4.14 acres x 0.05 x \$105,000 = 0.207 acres, or \$21,735.

The Parks and Recreation Committee reviewed the sketch plat for Victoria Commercial during their regular meeting on [September 16, 2024](#), and recommended the City Council consider a park for the South Growth commercial area - but not as part of the Kwik Trip proposal due to proximity to County Road 10 and limited acreage. They also recommended a trail connection for the greater commercial area to County Road 11 (Victoria Drive).

Parking

[Zoning Code Section 20](#) designates the number of parking spaces required for specific uses, as well as parking lot setbacks, and parking stall dimensions. Based on the proposed convenience store and Zoning Code definitions, a "retail stores and service establishments" is the most appropriate parking evaluation. This would require 3.6 parking spaces per 1,000 sq. ft. of gross retail store area. This results in a minimum parking requirement of 33 spaces, which is satisfied with 63 parking spaces

proposed for the site. The parking lot setbacks and minimum stall dimensions all appear to be met as well except for a stall adjacent to the vacuums and air pump.

Pedestrian Connectivity

The proposal includes sidewalks along the internal roads of the development, as well as a trail along the south side of Crossings Parkway, and a trail along County Road 11 which is anticipated with future reconstruction of the road anticipated in 2028. There is also a proposed concrete sidewalk that leads from Ridgeview Boulevard into the site from the west. These pedestrian connections meet our minimum requirements but will also need to be confirmed with Carver County in relation to their road improvement projects. Any additional pedestrian features or connectivity will need to be reviewed by the City.

Stormwater Management

This property falls under the jurisdiction of the Carver County Watershed Management Organization (CCWMO), and thus is subject to their rules. A copy of the final plat was provided to the CCWMO and the Applicant is working through their approval processes. A copy of the CCWMO memo is attached to this case.

The City Engineer also noted that a regional stormwater management approach may be beneficial for the commercial area and should be considered by the City. The Applicant is proposing a privately owned and maintained stormwater pond on the site, with a connection across Ridgeview Boulevard to potentially connect with a regional stormwater system as commercial development occurs further west and south.

Site Utilities

Utilities will come from the extension of the collector road to the north from the Victoria Ridge development with trunk sewer and water extensions. Well #6 is completed, but has not yet been permitted for pumping by the MnDNR. The permitted pumping date, and water appropriation allowance, has yet to be determined by the MnDNR and could impact the development timeline for this parcel. If necessary, City Staff have included a condition that landscaping cannot be installed, and the car wash cannot be used, until the well is permitted for pumping which was also approved with the preliminary plat.

Carver County Public Works Memo

The Carver County Public Works Department has provided a memo for the Planning Commission and City Council to consider which is attached to this case. The bulk of the memo is in relation to access, turn lanes, and future improvements on CSAH 11.

City Staff Review Comment Memo

A city staff review memo is attached to this case for consideration by the Planning Commission and City Council. The memo includes comments from the City's Community Development and Fire Departments, as well as comments from the City Engineer.

Public Hearing and Planning Commission (04/15/2025)

A public hearing was required for these applications and was properly advertised in the Waconia Patriot on Thursday, April 3rd, 2025. A copy of the notice was also published on the City of Victoria's website and on the monitor at City Hall. A letter notifying adjacent property owners within 350 feet of the request was also mailed on April 3rd, 2025 to 11 adjacent property owners. City staff did not receive any comments prior the public hearing.

Attachment 3

The Planning Commission held a public hearing for the requests during their regular meeting on April 15, 2025. No public comments were provided during the meeting on this request. The Planning Commission voiced concerns about the intersection of Crossings Parkway and County Road 11 and advised staff to continue discussions with Carver County regarding safer access at this intersection, as well as additional accesses in the South Growth commercial area. The Planning Commission was supportive of the project and recommended approval with a 6-0 vote.

BUDGET IMPACT:

All costs associated with this request are the responsibility of the Applicant.

LEGAL REVIEW:

The City Attorney has been provided title work to formulate their plat opinion. The Applicant must comply with any findings of their plat opinion prior to recording the final plat.

STAFF RECOMMENDATION:

If the Planning Commission recommends approve of the final plat and rezoning, City Staff have prepared the following conditions for consideration:

1. The Applicant shall address, to the City's satisfaction, all items outlined in the March 21st, 2025, staff memo.
2. The Applicant shall comply with all applicable regulations and conditions prescribed by the Carver County Water Management Organization (CCWMO) and receive all applicable approvals.
3. The Applicant shall enter into a development agreement with the City for this development prior to or concurrent with Final Plat approval.
4. The Applicant shall provide a letter of credit as established by the development agreement for all public improvements associated with this development.
5. The Applicant shall obtain all necessary City, County, PCA, and other regulatory agency approvals and permits prior to construction.
6. Compliance with all requirements of the City Attorney's plat opinion.
7. Well No. 6 must be permitted for pumping prior to installation of landscaping or use of the car wash.
8. Upon full build-out of Crossings Parkway, or if traffic safety improvements are deemed necessary by the Fire Department prior to the full build-out, a traffic analysis shall be conducted for the southern entrance into the Kwik Trip site from Crossings Parkway. This study shall be conducted by a third party at the expense of Kwik Trip to determine warrants for upgrades to the intersection. If the analysis determines an upgraded intersection is warranted, Kwik Trip shall be responsible for improvements to the intersection.
9. Recording of the final plat in the Office of the Carver County Recorder/Registrar of Titles within 180 days after the date of approval.
10. Furnishing the City with a certified mylar copy of the plat evidencing filing with the County.

STRATEGIC PRIORITIES:

<input checked="" type="checkbox"/>	Economic Vitality	<input checked="" type="checkbox"/>	Service Excellence	<input checked="" type="checkbox"/>	Infrastructure & Transportation	<input checked="" type="checkbox"/>	Housing & Community Character
<input checked="" type="checkbox"/>	Engagement & Communication	<input checked="" type="checkbox"/>	Public Safety	<input checked="" type="checkbox"/>	Recreation & Culture	<input checked="" type="checkbox"/>	Environmental Sustainability

ATTACHMENTS:

[Land Use Application](#)

[Kwik Trip #1792 Final Plat](#)

[Kwik Trip #1792 Plan Set](#)

[Kwik Trip #1792 Signage Plans](#)

[Kwik Trip - Compiled Staff Review Memo 03.21.25](#)

[Carver County Public Works Memo](#)

[CCWMO Comment Memo and Applicant Responses](#)

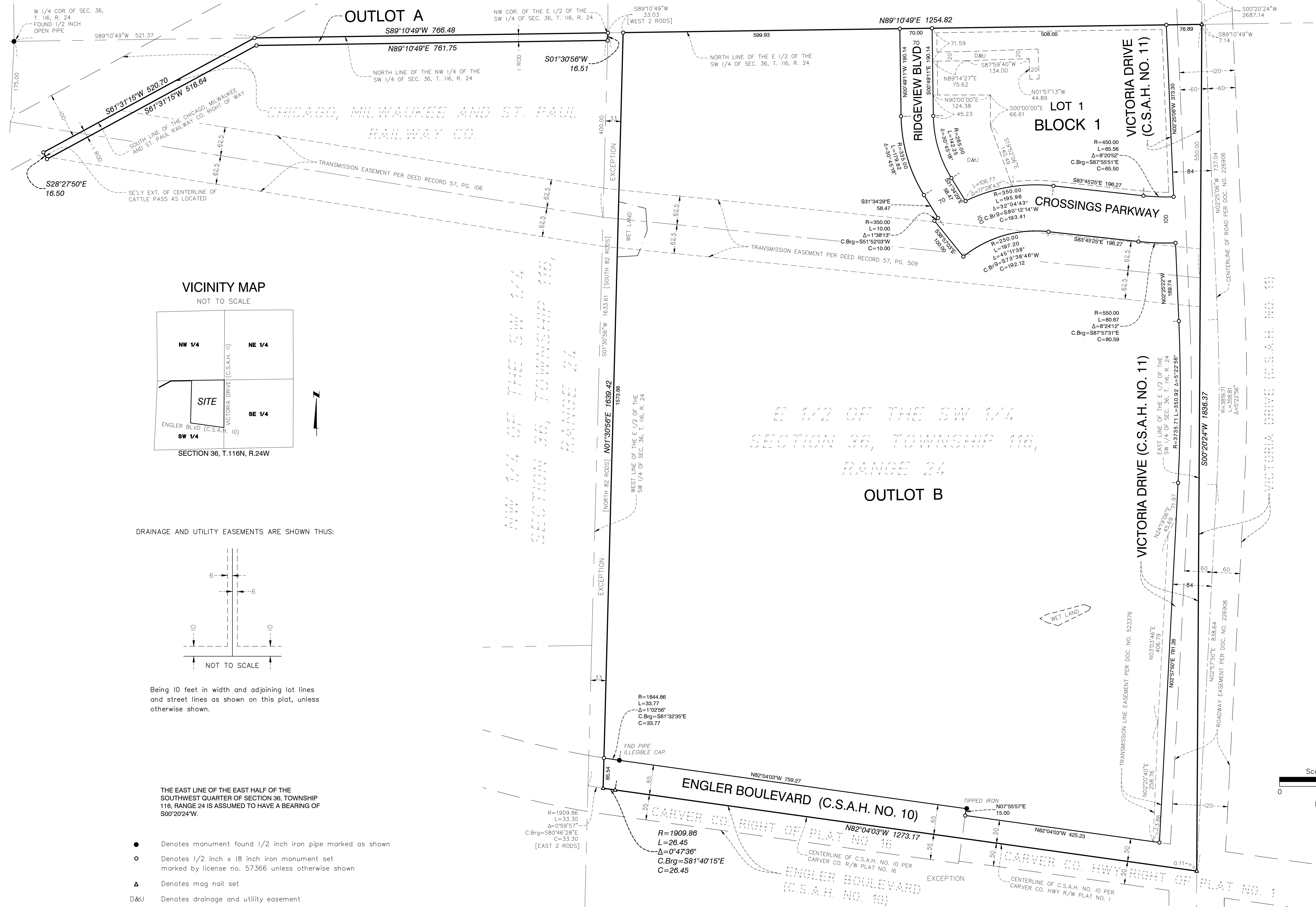
[Public Hearing Notice](#)

[2025- 27- Final Plat - Kwik Trip #1792 - Pdf](#)

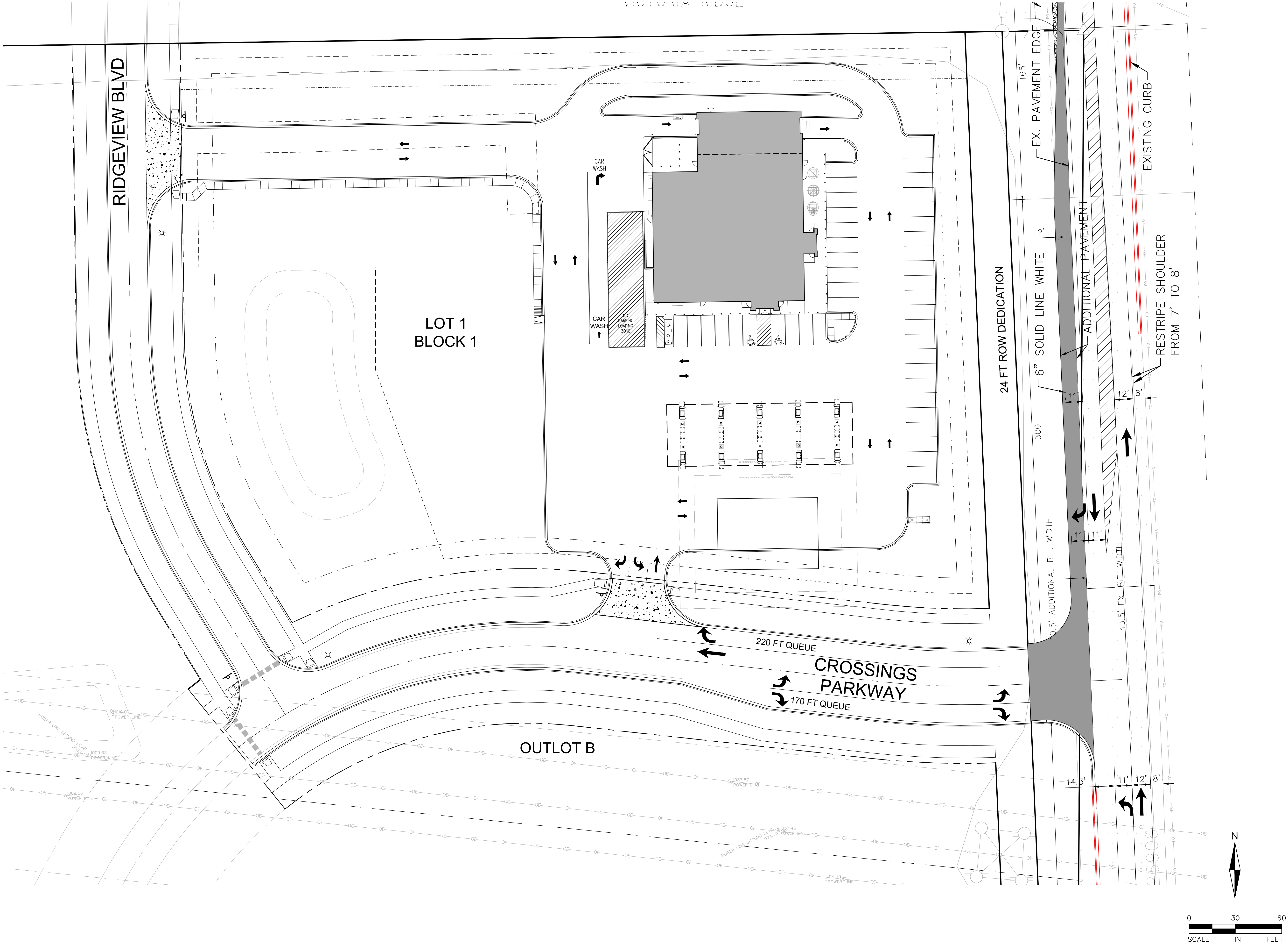
[2025-28 - Summary Publication - 481 ZC - Pending - Pdf](#)

[Ordinance 481 ZC - Kwik Trip 1792 Rezoning](#)

C.R. DOC. NO



Drawing name: X:\2023\40000073-00 - victoria commercial property - boye south\plan sheets\4000073site.dwg Feb 28, 2025 — 12:25am



Attachment 3

ALLIANT

733 Marquette Avenue
Suite 700
Minneapolis, MN 55402
612.758.3080
www.alliant-inc.com



VICTORIA CROSSINGS
NW CORNER OF CR 11 AND CR 10
VICTORIA, MN (LAKETOWN TOWNSHIP)

FINAL PLAT

SITE PLAN (LINEWORK ONLY)

I hereby certify that this plan, specification, or report was prepared by me or under my direct supervision and that I am a duly Licensed PROFESSIONAL ENGINEER under the laws of the State of MINNESOTA

DAN SJOBLUM, PE
10/08/24 54821
Date License No.

QUALITY ASSURANCE/CONTROL
D. NASH 10/08/24
BY DATE

DATE	ISSUE
10/08/24	KWIK TRIP REVIEW
10/31/24	TURN LANE DESIGN
11/05/24	PRELIMINARY PLAT
11/07/24	CCWMO WATERSHED APP.
01/22/25	CITY COMMENTS
01/27/25	WATERSHED COMMENTS
02/28/25	FINAL PLAT SUBMITTAL

PRELIMINARY
FOR REVIEW ONLY
NOT FOR CONSTRUCTION

PROJECT TEAM DATA
DESIGNED: DMS
DRAWN: DMS
PROJECT NO: 40000073

C100



ALLIANT

733 Marquette Avenue
Suite 700
Minneapolis, MN 55402
612.758.3080
www.alliant-inc.com



TRADITION
Development

VICTORIA CROSSINGS

NW CORNER OF CR 11 AND CR 10
VICTORIA, MN (LAKETOWN TOWNSHIP)

FINAL PLAT

SITE KEYNOTE PLAN

I hereby certify that this plan, specification, or report was prepared by me or under my direct supervision and that I am a duly Licensed PROFESSIONAL ENGINEER under the laws of the State of MINNESOTA

DAN SJOBLUM, PE
10/08/24 54821
Date License No.

QUALITY ASSURANCE/CONTROL

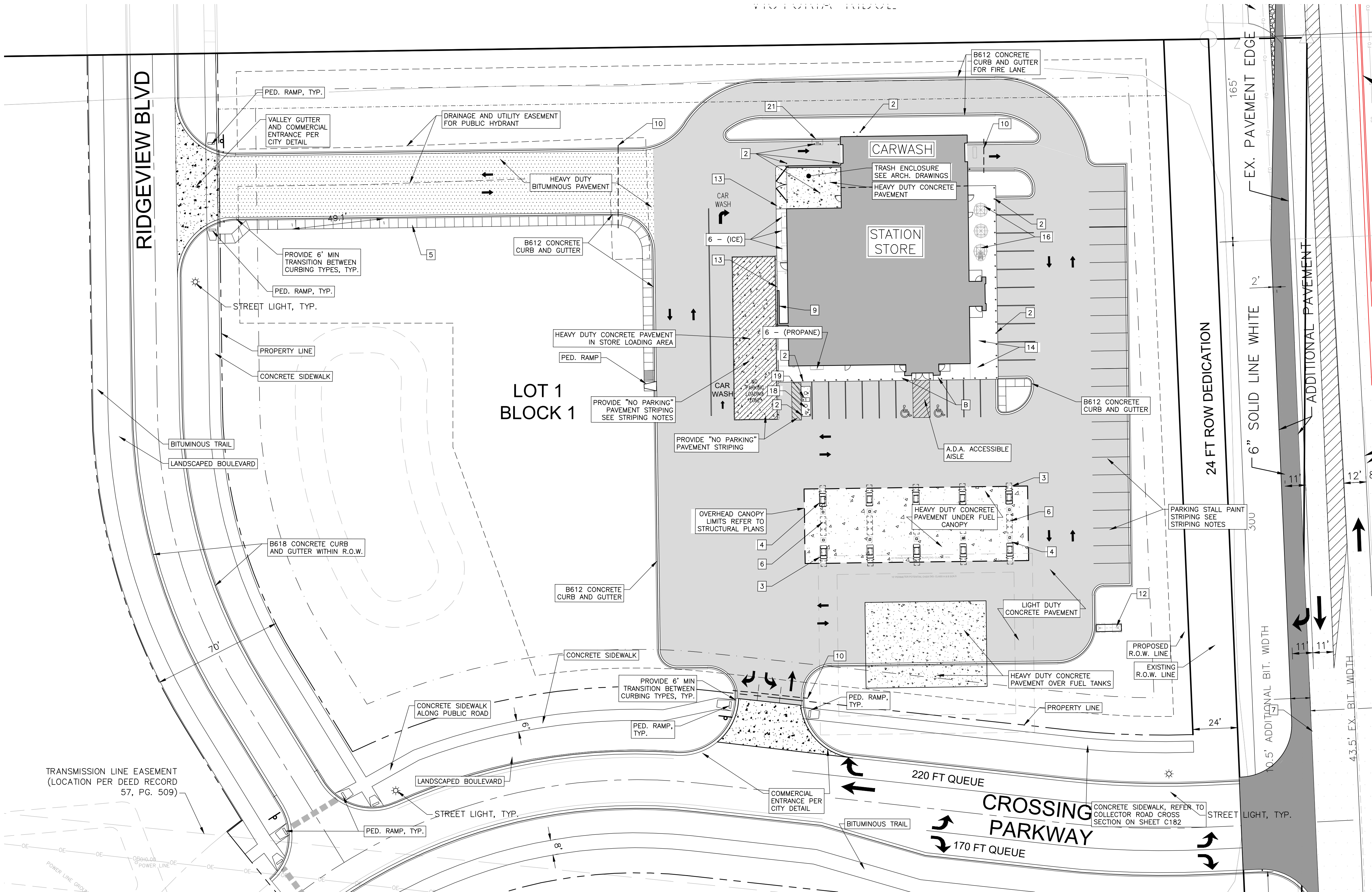
D. NASH 10/08/24
BY DATE

DATE	ISSUE
10/08/24	KWIK TRIP REVIEW
10/31/24	TURN LANE DESIGN
11/05/24	PRELIMINARY PLAT
11/07/24	CCWMO WATERSHED APP.
01/22/25	CITY COMMENTS
01/27/25	WATERSHED COMMENTS
02/28/25	FINAL PLAT SUBMITTAL

PROJECT TEAM DATA

DESIGNED: Value
DRAWN: AAA
PROJECT NO: 40000073

C101



SITE LEGEND:

- CURB & GUTTER
- EXISTING CURB & GUTTER
- OUTFALL CURB AND GUTTER
- CONSTRUCTION LIMITS
- PROPERTY LINE
- LIGHT DUTY CONCRETE PAVEMENT
- 4" CONCRETE WALK
- HEAVY DUTY CONCRETE PAVEMENT
- HEAVY DUTY BITUMINOUS PAVEMENT
- PROPOSED POLE MOUNTED LIGHT FIXTURE

SITE DATA:

EXISTING SITE AREA: 180,279 S.F. - 4.14 AC
EXISTING PERVIOUS AREA: ±180,279 S.F.
EXISTING IMPERVIOUS AREA: ± 0 S.F.

NET SITE AREA: 180,279 S.F. - 4.14 AC
PROPOSED PERVIOUS AREA: 107,073 S.F. - 2.46 AC
PROPOSED IMPERVIOUS AREA: 83,097 S.F. - 1.91 AC

PARKING DATA:
PARKING PROVIDED

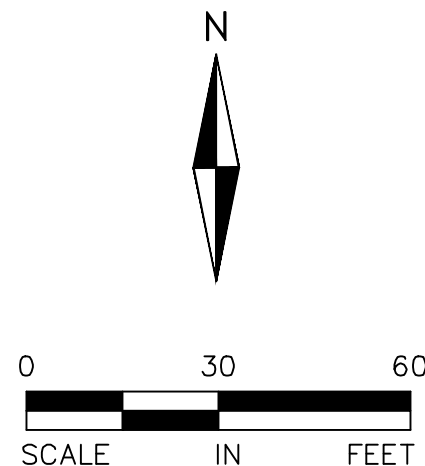
GAS PUMP STALLS: 20 STALLS
CUSTOMER PARKING STALLS: 41 STALLS
ACCESSIBLE STALLS: 2 STALLS
TOTAL PARKING PROVIDED: 63 STALLS

SITE NOTES:

- PRIOR TO STARTING CONSTRUCTION, THE CONTRACTOR SHALL BE RESPONSIBLE TO MAKE SURE THAT ALL REQUIRED PERMITS AND APPROVALS HAVE BEEN OBTAINED. NO CONSTRUCTION OR FABRICATION SHALL BEGIN UNTIL THE CONTRACTOR HAS RECEIVED AND THOROUGHLY REVIEWED ALL PLANS AND OTHER DOCUMENTS APPROVED BY ALL OF THE PERMITTING AUTHORITIES.
- CONTRACTOR SHALL FIELD VERIFY THE LOCATIONS AND ELEVATIONS OF EXISTING UTILITIES AND TOPOGRAPHIC FEATURES, SUCH AS EXISTING GUTTER GRADES AT THE PROPOSED DRIVEWAYS, PRIOR TO THE START OF SITE GRADING. THE CONTRACTOR SHALL IMMEDIATELY NOTIFY THE ENGINEER OF ANY DISCREPANCIES OR VARIATIONS FROM THE PLANS.
- ALL WORK TO BE PERFORMED IN ACCORDANCE WITH THESE PLANS AND SPECIFICATIONS AND THE REQUIREMENTS AND STANDARDS OF THE LOCAL GOVERNING AUTHORITY.
- CONTRACTOR IS RESPONSIBLE FOR DEMOLITION & REMOVAL OF ALL EXISTING STRUCTURES WHICH INTERFERE WITH NEW WORK AS SHOWN.
- ALL DIMENSIONS, GRADES, EXISTING AND PROPOSED INFORMATION SHOWN ON THE PLANS SHALL BE FIELD VERIFIED BY THE CONTRACTOR PRIOR TO CONSTRUCTION. CONTRACTOR SHALL NOTIFY THE CONSTRUCTION MANAGER IF ANY DISCREPANCIES EXIST PRIOR TO PROCEEDING WITH CONSTRUCTION FOR NECESSARY PLAN OR GRADE CHANGES. NO EXTRA COMPENSATION SHALL BE PAID TO THE CONTRACTOR FOR WORK HAVING TO BE REDONE DUE TO INFORMATION SHOWN INCORRECTLY ON THESE PLANS IF SUCH NOTIFICATION HAS NOT BEEN GIVEN.
- DIMENSIONS SHOWN ARE TO FACE OF CURB, CENTER OF STRUCTURE, EDGE OF SIDEWALK OR EXTERIOR OF BUILDING.
- ALL CONCRETE SIDEWALK ADJACENT TO BUILDING SHALL BE SEPARATED BY A 1/2" EXPANSION JOINT.
- PROTECT EXISTING CONCRETE SIDEWALKS DURING ALL PHASES OF CONSTRUCTION. CONTRACTOR TO REPLACE ANY CRACKED OR BROKEN PANELS CAUSED BY SITE CONSTRUCTION.
- CONTRACTOR IS RESPONSIBLE FOR THE REMOVAL & DISPOSAL OF THE EXISTING BITUMINOUS. BITUMINOUS SHALL BE SAW CUT OR JACK HAMMERED FOR STRAIGHT EDGES. TACK SHALL BE USED ON BITUMINOUS EDGE PRIOR TO PATCHING. MATCH EXISTING GRADES.
- CONTRACTOR SHALL PROTECT ADJOINING PROPERTIES & STRUCTURES FROM HAZARDS ASSOCIATED WITH HIS CONSTRUCTION ACTIVITIES & SHALL BE RESPONSIBLE FOR ALL DAMAGES TO PROPERTIES & STRUCTURES THAT OCCUR AS A RESULT OF THESE ACTIVITIES.
- CONTRACTOR SHALL NOT IMPEDE EXISTING TRAFFIC CIRCULATION TO ADJACENT BUSINESSES. PROVIDE TRAFFIC CONTROL DURING CONSTRUCTION PER MNDOT STANDARDS.
- CONTRACTOR SHALL PERFORM SWEEPING ON PRIVATE PARKING AREAS AND PUBLIC STREETS AT LEAST ONCE A WEEK, ONCE A DAY IF NEEDED.
- CONTRACTOR SHALL BE HELD FULLY RESPONSIBLE TO PREVENT AND ELIMINATE ANY DUST NUISANCE OCCASIONED BY AND DURING CONSTRUCTION, UNTIL THE PROJECT HAS BEEN COMPLETED AND HANDED OVER.
- REFER TO ARCHITECTURAL DRAWINGS FOR CONCRETE STOOPS ADJACENT TO PROPOSED BUILDING.
- CONTINUOUS CONCRETE CURB & GUTTER WHICH CHANGES TYPE SHALL HAVE A FIVE FOOT TRANSITION.
- ALL CONCRETE CURB AND GUTTER ADJACENT TO CONCRETE WALK SHALL BE SEPARATED BY A 1/2 INCH EXPANSION JOINT.
- PARKING LOT STRIPING SHALL BE 4 INCH WHITE.
- ALL WORK WITHIN THE R.O.W. SHALL COMPLY WITH THE CITY OF VICTORIA ENGINEERING DESIGN STANDARDS.
- ALL CURB AND GUTTER TO BE CONCRETE B612 CURB UNLESS NOTED OTHERWISE.
- CONCRETE APRONS TO BE INSTALLED AT ACCESS DRIVES WHERE SHOWN ONTO PUBLIC STREETS PER CITY STANDARDS.

PLAN KEY NOTES:

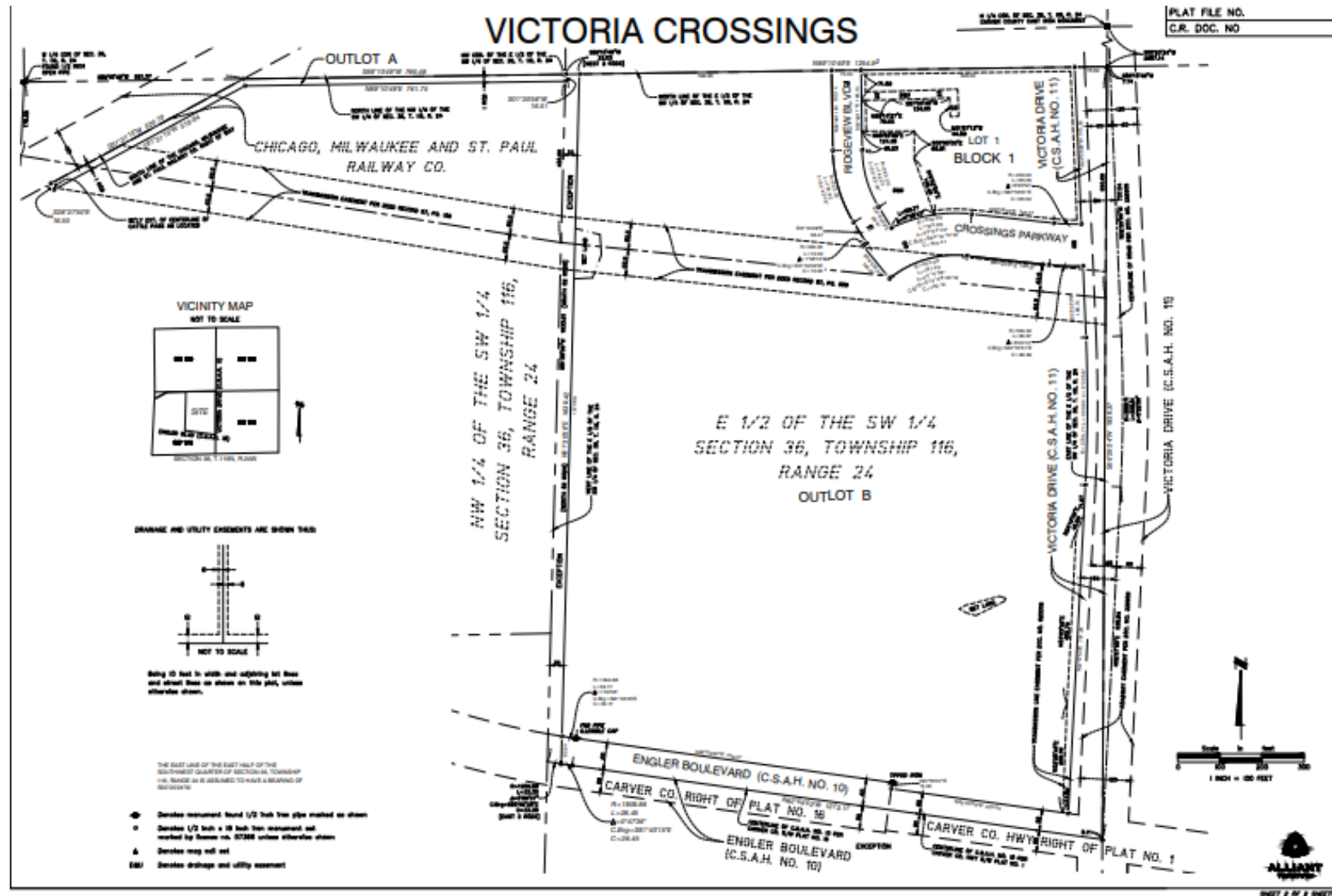
- LANDSCAPE AREA SEE LANDSCAPE PLAN SHEET L-1.0
- 30" HEIGHT, 6" DIA. CONCRETE FILLED PIPE BOLLARD SEE DETAIL 6/SP5.
- 36" HEIGHT 6" DIA. CONCRETE FILLED PIPE BOLLARD SEE DETAIL 7/SP5.
- CONCRETE ISLAND WITH 6" EXPOSURE WITH FUEL DISPENSER, DISPENSER PER OWNER.
- 4" CONCRETE WALK.
- OUTDOOR MERCHANDISING.
- MATCH EXISTING CURB AND GUTTER / SIDEWALK / PAVEMENT.
- TRANSFORMER LOCATION.
- TOTE SCREENING WALL. SEE ARCHITECTURAL PLANS.
- PVC IRRIGATION SLEEVE UNDER PAVEMENT. VERIFY WITH IRRIGATION PLAN FOR EXACT SIZE.
- BIKE RACK PER OWNER.
- PYLON SIGN.
- PAINT FACE OF CURB TRANSITION WITH HIGH VISIBILITY YELLOW PAINT.
- 6" INTEGRAL CONCRETE CURB AND WALK.
- SITE AREA LIGHT WITH CONCRETE BASE PER 5/SP5
- PICNIC TABLES PER OWNER.
- CONCRETE VALLEY GUTTER PER DETAIL 13/SP5
- FREE AIR COMPRESSOR PER OWNER. PROVIDE SIGNAGE PER OWNER.
- AUTO VACUUM PER OWNER ON CONCRETE ISLAND WITH 6" EXPOSURE. PROVIDE TRASH CONTAINER PER OWNER.
- PEDESTRIAN CURB RAMP.
- CARWASH KEYPAD PER OWNER. PROVIDE TRASH CONTAINER PER OWNER.
- FUEL TANKS VENT STAND PER OWNER.



RESOLUTION 2025-

Exhibit B

Final Plat for Kwik Trip #1792





City of Victoria

AGENDA REPORT

Regular Council Meeting - Mar 24 2025

Agenda Item: West Creek Village Residential Development - Revised Sketch Plat

Staff/Department: Brian McCann City Planner - Community Development

BACKGROUND INFORMATION:

Applicant: U.S. Home, LLC (the "Applicant"), on behalf of Victoria Properties, LLC (the "Property Owner").

Location: The Subject Property consists of two parcels (PID: 070350321 and a portion of PID: 070350100) for a combined approximate 88.1 acres, which is located north of County Road 10, west of the Huntersbrook Creekside and Marsh Hollow developments, south of the Marsh Lake Hunting Preserve, with a portion the railroad intersecting the site.

Synopsis: The Applicant has submitted a sketch plat request for consideration by the Planning Commission and City Council. The proposal includes:

- 56 row townhomes;
- 18 twinhomes; and
- 36 single-family homes

Existing Conditions

The site currently consists of farmland and associated structures, rolling hills, wetlands, and a portion of Chaska Creek.

Sketch Plat

The Applicant previously provided a concept for rowhomes on the south side of Creekside Lane and single-family homes on the north side of Creekside Lane, which was reviewed by the Planning Commission and City Council last year.

The revised concept attached to this case made the following changes based on feedback from the Planning Commission, City Council, and city staff:

- A trail connection to the Marsh Hollow development to the east
- Inclusion of a quarter-acre tot lot for the neighborhood
- Single-family homes in replacement of row townhomes on the east side of the development, which subsequently addresses snow storage concerns
- Twinhomes on the southwest side of the development

No approvals or actions are to be taken during this meeting; rather, the sketch plat process is to provide guidance to assist the Applicant in any subsequent applications.

Proposed Uses

The Applicant is proposing three residential products for the property which are row townhomes, twinhomes, and single-family dwellings. The proposed uses are addressed as permitted uses in the

City's Zoning Code Section 24-1 Low Density Residential (R-1) District, and Section 24-3 Multi-Family Residential (R-3) District.

Annexation and Rezoning

The property is currently located in Laketown Township, so it does not have a zoning designation and would require annexation approval from Laketown Township and the Office of Administrative Hearings. Upon annexation, city code requires that annexed property automatically have a zoning classification of Agricultural.

A rezoning would be required to rezone the property from Agricultural to a mix of Planned Unit Development (PUD) with underlying R-1 Low Density Residential, and standard R-3 Multi-Family Residential. These zoning designations comply with the future land use classifications for a blend of Low and Medium Density Residential. Rezoning is discretionary and should capture the city's vision of development for this parcel.

Based on the revised concept, city staff anticipate the following deviations as part of the PUD request from the Applicant at preliminary plat:

- Reduction in minimum lot size from 12,000 square feet to 5,600 square feet
- Reduction in minimum lot width from 130 feet to 100 feet
- Reduction in front setback from 30 feet to 25 feet
- Reduction in side setbacks from 10 feet to 8 feet (intended to fit a 40-foot wide home with 8 foot setbacks, resulting in 56-foot lot width)
- Increase in impervious for the single-family units from 35% to 50% (outside shoreland)
- Possible reduction in minimum lot width of 40 feet to 30 feet to accommodate the townhomes

Comprehensive Plan Amendments

Their previous concept would have resulted in a net density of approximately 6.25 units per acre for the townhomes, and 2.00 units per acre for the single-family homes, requiring a Comprehensive Plan Amendment to guide a portion from Low Density Residential (2.25 - 6.00 units per acre) to Conservation Residential (0.5 - 2.25 units per acre). These single-family homes north side of Creekside Lane will require a Comprehensive Plan Amendment for Conservation Residential to allow lower densities adjacent to strict environmental conditions due to West Chaska Creek. This required Comprehensive Plan Amendment would still be required for the revised sketch plat.

The property is currently guided a blend of Low and Medium Density Residential, a small area of Commercial, and portions of Open Space. A Comprehensive Plan Amendment would be required to include all proposed townhomes and townhomes as Medium Density, a portion of the single-family as Low Density areas, and to allow a lower density for the single-family homes north of Creekside Lane as part of "Conservation Residential District" currently pending approval by the Metropolitan Council. The amendment should also include changing the Commercial land use designation to Open Space, since the portion is encapsulated by wetlands.

These amendments and housing products would result in the following densities per unit type:

- Single-family (Conservation) - 0.62 units per acre (13 units / 20.89 acres)
- Single-family (standard) - 2.56 units per acre (23 units / 8.97 acres)
- Townhomes - 11.48 units per acre (18 units / 1.56 acres)
- Townhomes - 9.89 units per acre (56 units / 5.66 acres)

As mentioned above, a mix of housing products would require realignment of our Low Density Residential and Medium Density Residential (6 - 12 units per acre) guided areas. Staff conducted an analysis with help from the Metropolitan Council on the proposed products and resulting density:

- Current city-wide density: 3.47 units per acre
- City-wide density after amendments: 3.36 units per acre
- 2040 requirement: 3.0 units per acre
- 2050 requirement: 3.5 units per acre

The resulting amendments would slightly lower our overall city-wide density by 0.09, but still within the range for the 2040 Comprehensive Plan. The city will need to consider additional density in the 2050 Imagine plan due to the minimum city-wide density increase to 3.5 units per acre.

Comprehensive Plan Amendments are discretionary and should fit the vision of the properties as determined by the Planning Commission and City Council.

Proposed Site Layout

The submitted sketch plat proposes a majority of units from a single access on the south side of the extended Creekside Lane, and 13 single-family homes with two accesses from the north side of Creekside Lane. Seven of the 13 lots are proposed with a cul-de-sac, with the remaining eight single-family lots having private drives for access from Creekside Lane and the public cul-de-sac. The Applicant has also proposed a private street for the townhomes, and a private drive for six of the single-family homes north of Creekside Lane. The remaining streets are proposed to be public roads.

The Applicant has shown a trail along the south side of Creekside Lane, and a trail connection to the Marsh Hollow development from the south side of the site. There is a small sidewalk connection shown between the private drive and the cul-de-sac on the north side of Creekside Lane, and single sidewalks shown throughout the development.

There are some general concerns from city staff with this proposal regarding the availability of Well No. 6 for services, the necessity of a future water treatment plant for our south and western growth areas, and limited access to Carver County Road 10 / Engler Boulevard with a single access point for the residents south of Creekside Lane. A temporary access onto County Road 10 is shown on the sketch plat, and the plan has been accepted by Carver County until future development occurs to the west.

City staff are requesting feedback from the Council related to three items on the revised sketch plat:

- Preference of a public or private street for the townhomes;
- Preference of sidewalk on one, or both sides for the townhomes; and
- Preference for a trail the entire stretch on the north side of Creekside Lane, or the connection between the private drive and the cul-de-sac as shown by the Applicant - which should be upgraded to an 8' bituminous trail

Shoreland Overlay District

A portion of the Chaska Creek runs through the north side of the property, which is within the Shoreland Overlay District and classified as a tributary. Tributaries within the Shoreland Overlay District rely on the a minimum lot width of 75 feet, per the city's recent Shoreland Ordinance for Tributaries. Additionally, 50% of the shoreland area applicable to this proposal must consist of open space. The maximum impervious for these properties would also be a maximum of 25%. It is staff's understanding that these single-family units will comply with all of these requirements, but these calculations should be confirmed at preliminary plat.

Building Material and Signage Review

Residential performance standards are outlined in [Zoning Code Section 18-8 Residential Performance Standards](#), including permitted and prohibited building design materials. Renderings have been provided and appear to meet the necessary design standards, but will be further reviewed during preliminary plat.

Any proposed development signage should be provided at preliminary plat for review by city staff in conformance with [Zoning Code Section 21 - Sign Regulations](#).

Landscape and Tree Preservation Requirements

The following standards are provided for consideration from [Zoning Code Section 33 - Landscape and Open Space Requirements](#), and [Municipal Code Article 105-III Tree Preservation and Replacement](#):

- **Open Space:** A minimum percentage of 50% open space is required for R-1 uses, and 25% for R-3 uses. This calculation does not include sidewalks or trails. Wetlands, creeks, and buffer areas can count towards this but they must be established as outlots.
- **Plantings:** 3 trees per R-1 property is required, as well as 1 tree and 1 shrub for every 1,000 feet of required open space for R-3 properties. These are trees and shrubs in addition to required buffers.
- **Boulevard Trees:** Boulevard trees are required along the front or rear yards adjacent to right-of-way every 45 feet, and every 35 feet for secondary front yards on corner lots. The trees must be placed a minimum of 25 feet from intersections.
- **Foundation Plantings:** These are required along the foundations of the townhomes.
- **Buffers:** 40' buffers are required adjacent to major arterial roadways, and 25' buffers are required between R-1 and R-3 zoning districts.
- **Tree Preservation:** A tree preservation plan will not be required until preliminary plat submittal, and will be evaluated by city staff at that time.

Staff will review a landscape plan and any tree preservation plans with a future preliminary plat submittal, if pursued by the Applicant.

Parkland Dedication

The City of Victoria requires parkland dedication for residential developments in the amount of the (the number of residential units in the development x the calculated number of residents) / 75 = acres of land dedication. If the Applicant is requesting a cash fee in lieu of land contributions, the acreage is multiplied by the calculated fee per acre of land in the city's fee schedule, which is \$105,000 per acre.

The following breakdown is representative of the City of Victoria's 2025 fee schedule and is subject to change for future years, but this is the evaluation for their previous submittal since exact numbers for the townhome and newly-added single-family units were not provided:

(56 townhome units x 2 residents per unit) / 75 = 1.49 acres = \$156,800

(18 townhome units x 2 residents per unit) / 75 = 0.48 acres = \$50,400

(13 single family units x 3.5 residents per unit) / 75 = 0.60 acres = \$63,700

In total, 2.58 acres, or \$270,900, or some combination thereof.

The Parks & Recreation Committee reviewed the proposed sketch plat, and the rescinded preliminary plat, and were supportive of the trail incorporations. The Committee also suggested a full cash fee in lieu of land dedication as a viable option if they could not fulfill their full land obligation. If there were opportunities to expand the park area, they were supportive of that as well.

The proposed trails along Creekside Lane and the connection to Marsh Hollow can be deducted from these amounts, as well as the quarter-acre park provided by the Applicant. The Applicant is aware of our parkland dedication requirements and is expecting to provide a cash fee in lieu of the missing land requirements.

Parking and Pedestrian Connectivity

[Zoning Code 20-6 Schedule of Off-Street Parking and Loading or Unloading Space Requirements](#)

designates the number of parking spaces required for specific uses. Based on this section, this site would yield the following breakdown of parking spaces, which will need to be evaluated with exterior elevations at preliminary plat submittal:

- Townhomes: 2 spaces with at least 2 enclosed spaces for 50 percent of the units and at least 1 enclosed space for the remainder.
- Single-family and two-family: 2 enclosed spaces per dwelling.

The development does not have any guest parking areas outside of the public streets. Planning Commission and City Council should determine if guest parking areas for the townhomes would be beneficial, or not.

The proposal includes trail along the south side of Creekside Lane, with sidewalk on one side of the road for the dwellings. Planning Commission and City Council should decide if they want sidewalks on both sides of the road for the townhomes, since their density exceeds 3 units per acre.

Streets

The proposed sketch plat presents two accesses from the north side of the collector road, one private and one public. The private drive would connect to the cul-de-sac stub for some of the single-family homes. The southern access is proposed to serve townhomes, single-family homes, and townhomes with a temporary access to County Road 10. There are concerns from city staff regarding the number of units with a single access on Creekside Lane for the south side of the development, until development occurs to the west.

Wetlands and Stormwater Management

This property falls under the jurisdiction of the Carver County Watershed Management Organization (CCWMO), and thus is subject to their rules. As shown in the concept drawings, impacts to existing wetland are likely, which will need to be mitigated pursuant to the CCWMO. Wetland buffers should be platted as outlots, and access to all ponds must meet city standards.

Site Utilities

Utilities will come from the extension of Creekside Lane to the west from the Marsh Hollow development with trunk sewer and water extensions. Well #6 must be completed and permitted by the MnDNR before services outside the current city limits can be served. The permitted pumping date, and water appropriation allowance, has yet to be determined by the MnDNR and could impact the development timeline for this parcel.

This parcel is also within the future search area for a second water treatment plant, and should be considered as part of the sketch plat review.

Summary of Challenges for Consideration

- Reduction in R-1 standard minimum lot size, width, depth, front and side setbacks, and increased impervious for many of the single-family homes

- No shown landscape buffers adjacent to Creekside Lane
- Possible reduction in the R-2 standard minimum lot width from 40 feet to 30 feet
- Quarter-acre park tot lot, and no other gathering areas for the community
- Limited access to Highway 10 with a single access on Creekside Lane
- Additional townhome units on a private street beyond the allowable 12 units
- No trail on the north side of Creekside Lane
- Sidewalks on one side of the street throughout the development

Planning Commission - 03/19/2025

The Planning Commission reviewed the previous sketch plat request at their regular meeting on March 19, 2025, and discussed the following:

- General acceptance of the proposed changes
- Preference for a private 26' road for the townhomes to allow parking on one side of the road
- Preference for sidewalks on both sides of the road for the townhome area, to allow residents to easily access the park
- Preference for the simple connection on the north side of Creekside Lane to connect the cul-de-sac and private drive, instead of the whole stretch of Creekside Lane - although it should be upgraded from sidewalk to trail
- General concerns about snow storage and sightline for drivers along the road south of Creekside Lane

City Council Considerations

- Does the sketch plat meet the vision of this parcel? Rezoning and Comprehensive Plan Amendments are discretionary - if the housing product does not fit the vision of this area, the Applicant should be informed during the sketch plat review.
- Do the housing products meet the intent of low and medium density residential (warranting a rezoning and CPAs)? Should this property be considered for higher/lower density housing options?
- Does the general development (housing products, configuration, parks, streets, etc.) meet the intended vision, warranting Comprehensive Plan Amendments that may possibly lower the density?
- Are the proposed deviations from R-1, and potentially R-2, performance standards acceptable for a PUD?
- Are there any particular neighborhood amenities that should be considered for this area? Is the parkland dedication satisfactory for the proposed development and future residents?
- Does the site layout appear to function adequately for access, navigation, parking, pedestrians, etc.?
- Will noise from the railroad or County Road 10 negatively impact the southern townhome residential lots? If so, how should those impacts be mitigated?
- Are there concerns about the number of units on a private drive?
- Is there a preference on public or private street for the townhomes?
- Is there a preference for trail along the entire stretch of the north side of Creekside Lane? Or the connection as shown?
- Is there a preference for sidewalks along both sides for the townhomes, or other areas exceeding 3 units per acre?
- If the concept does not fit the City Council's vision - should they come back with a revised concept?
- If the concept does fit the vision - should the Applicant proceed with a preliminary plat application?

BUDGET IMPACT:

All costs associated with this request are the responsibility of the Applicant.

STAFF RECOMMENDATION:

The Sketch Plat process is the time for the Planning Commission and City Council to provide feedback to the Applicant on the proposal in order to better inform the Applicant of items that are supported or not supported. There is no formal action taken as part of the Sketch Plat.

Staff recommends the City Council consider the items noted above as part of their feedback, as well as any other questions, comments or concerns that arise.

STRATEGIC PRIORITIES:

<input checked="" type="checkbox"/>	Economic Vitality	<input checked="" type="checkbox"/>	Service Excellence	<input checked="" type="checkbox"/>	Infrastructure & Transportation	<input checked="" type="checkbox"/>	Housing & Community Character
<input checked="" type="checkbox"/>	Engagement & Communication	<input checked="" type="checkbox"/>	Public Safety	<input checked="" type="checkbox"/>	Recreation & Culture	<input checked="" type="checkbox"/>	Environmental Sustainability

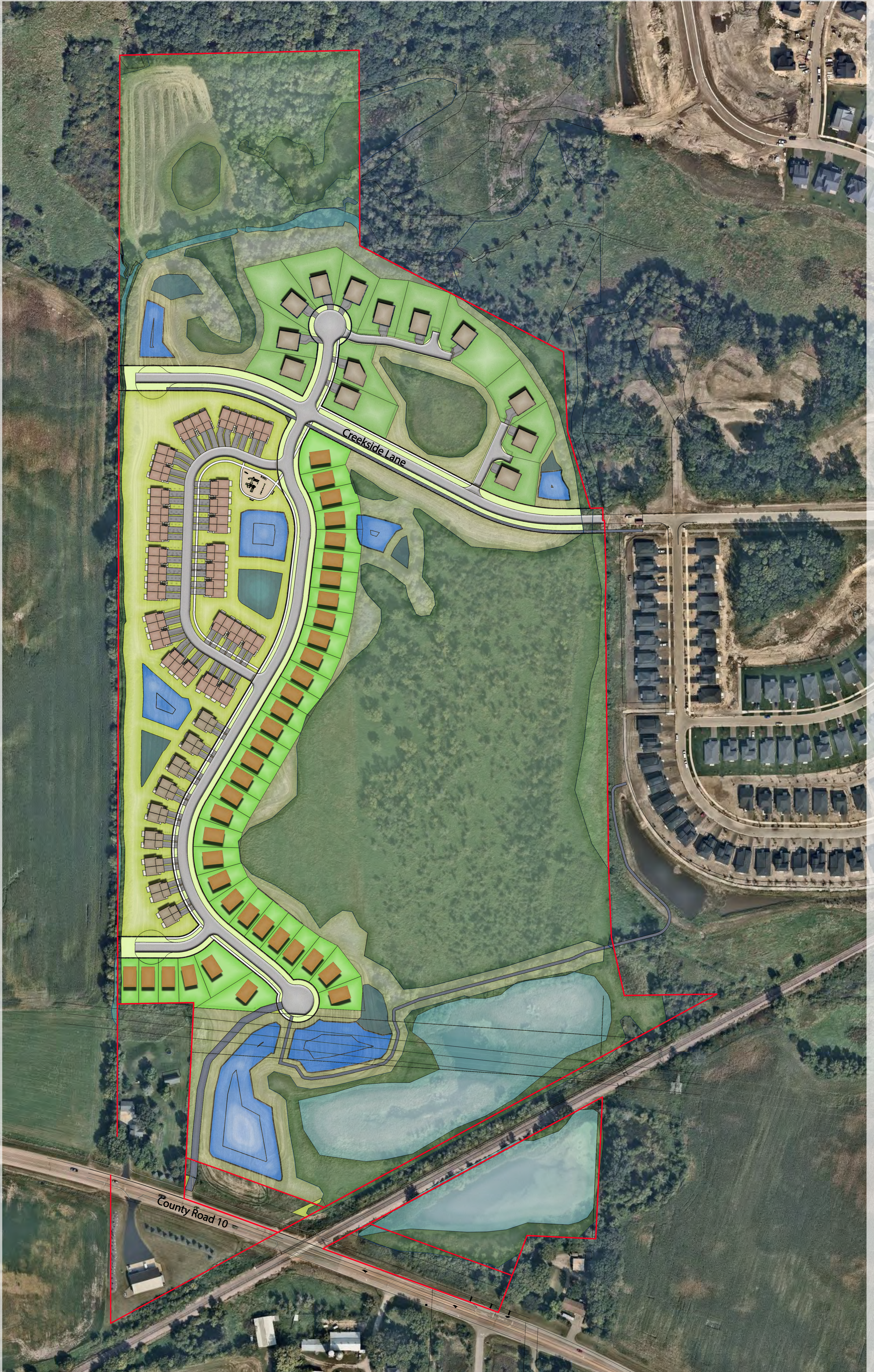
ATTACHMENTS:

[West Creek Village Revised Product Markup Architecture](#)

West Creek Village

Victoria, Minnesota

Attachment 4 6.2.



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