

March 16, 2026



Molly Westman
Community Development
City of Mankato
Intergovernmental Center
10 Civic Center Plaza
Mankato, MN 56001

RE: ZONE-12-26: CUP/CDC/VARIANCE
Comments/Responses #1
Front Street Redevelopment

City Community Development team:

Thank you for taking the time to review the Conditional Use Permit (CUP), Certificate of Design Compliance (CDC) and Variance applications for the Front Street Redevelopment in downtown Mankato. We have received the city comments dated March 11, 2026. Below are the city's comments followed by our responses to accompany the enclosed plans resubmitted for city review.

COMMENTS/RESPONSES

- a. The plan submitted does not conform to the standards for a Certificate of Design Compliance. The applicant shall review the standards set forth in the Urban Design Guidelines, specifically, Principles 3, 4, 5, 6, 7, 8, and 10. Staff would be willing to further discuss this issues following your March 16 meeting with Ms. Draper.

ISG Response:

- *3 – Integrate traffic movement with pedestrian safety and street scape*
 - *Site access has been removed from Front Street providing a continuous pedestrian corridor from Liberty to Warren Street.*
 - *Landscape will screen the parking lot along Riverfront Drive.*
 - *The parking ramp designed in the center of the development to allow the buildings to screen it.*
 - *Dedicated pedestrian breezeway connecting the screened parking deck to S. Front Street created to facilitate direct and convenient access for consistent with enhancing future walkability for residents and visitors in the CBD.*
 - *Short- and long-term bike parking will be provided to encourage alternative forms of transportation with a minimum of 75 bike stalls provided as a residential amenity.*
- *4 – Respect the traditional urban development pattern*
 - *The facade along South Front Street support the urban fabric and retail corridor by holding the building to the R.O.W. line for at least 82% of the street frontage, with the remaining setbacks serving as an urban plaza at the intersection of S. Front Street and Warren Street, site triangles, and a pedestrian garage entrance along the mid-block of Warren Street.*
 - *On Warren Street, the parking deck will be shielded from view with architectural paneling, and the vehicular entrance will be visually minimized by the office building above.*
 - *Along South Front Street, retail bays will help to activate and extend the shopping corridor, with inset storefronts and canopies for future retail signage and pedestrian cover. An elevated terrace at the second level will provide further engagement between the private residential development and the public sidewalk*

below. The primary pedestrian garage entrance along the mid-block of South Front Street will also serve as a point of entry for the café and the retail bay at the corner of Liberty and South Front Street.

- Along S. Riverfront Street, the developer has acknowledged the city's request to increase the width of the sidewalk to a desired 8 feet in width from the back of curb. In order to accommodate this public encroachment into the private development, the office building has been pulled off the Riverfront R.O.W. providing enough space for the 8-foot sidewalk and landscape buffer.
- 5 – New or renovated buildings should complement adjacent buildings
 - We are in the CBD, and our planning strategy and vision applies to Urban Design in this defined area in order to achieve the Phase 2 downtown plan of becoming a future oriented amenity, with a mix of complementary uses that attract and becomes a social, livable and vital regional hub. Limiting this approach to only a block by block design would also restrict the possible outcomes to achieve the desired goal. The design approach with new buildings has been to embolden the use of local products that are native to Mankato, when and where the cost is feasible. Many of the buildings in Phase 1 of the downtown development over the last decade have utilized Kasota stone and Vetter stone products as examples that have been utilized and align well with the desire to enhance walkability and comfort with attractive design. Greater Mankato has no obligation to brick design for new buildings as the power of utilizing local is a core part of the strategy for the Phase 2 plan and our future story. The Post Office is a full building example of attractive design that has held up since its original 1895 design and addition in 1932 as an example of design and feasibility not being restricted. The proposed new development of this site will continue to utilize the exterior design as an attraction to the Phase 2 plan in the CBD.
 - The Team has reviewed with city staff the information that would be helpful to illustrate the adherence to the Urban Design Guidelines Principle V. We will submit a supplemental document to describe the design's demonstration of the salient points of the principles, but below is a summary of these points:
 - Alignment: The facade along South Front Street support the urban fabric and retail corridor by holding the building to the R.O.W. line for at least 82% of the street frontage, with the remaining setbacks serving as an urban plaza at the intersection of S. Front Street and Warren Street, site triangles, and a pedestrian garage entrance along the mid-block of Warren Street.
 - Width: The existing architecture along S. Front Street demonstrates a mix of storefront typologies that range in widths from ~21ft, ~24ft, ~40ft, and ~60ft. Our design employs a variety of architectural moves to create a varying rhythm to complement the context via architectural pilasters, inset storefronts, building entrances, and strong vertical piers to interrupt and break down the facades at the pedestrian scale comparable to the surrounding 2-story shopfronts. See Fig. 2.0



- *Horizontal Rhythms: The overarching commonality of the retail corridor would be a horizontal capstone or limestone ribbon that delineates ground floor retail with upper-level private uses, masonry and cast stone accents, as well as tall glass storefronts with a variety of mullion patterns or large glazing with no mullions. Our development incorporates a strong horizontal ribbon establishing the datum that separates the ground level storefront activity with the private uses above (as articulated with smaller, punched openings). The storefronts will have vertical and horizontal mullions to reduce large expanses of glazing and provide more texture and depth in layers.*
- *Entrances: The entrances all face the street, but are all set back such that the swing of the door does not overlap the right-of-way, while enforcing the sidewalk pattern as well as defining entrance points.*
- *6 – Architecture should stimulate interest at the street level*
 - *Display Windows: The retail bays with a high level of transparency due to a high ratio of glazing to solid walls all contribute to the interest at the street level. Additional architecture features such as pilasters, canopies, future retail signage and awnings, and the residential overlook all contribute to the stimulation of activity at the street level.*
 - *Outdoor Space: Along with the plaza at the corner of Warren and S. Front, the retail bays all have storefronts set back to encourage additional outdoor seating and retail activity along S. Front Street while maintaining the sidewalk useability and pattern.*
- *7 – Mankato's traditional character should be reinforced through building color, texture and materials*
 - *The design incorporates the warm, buff tones of the Mankato stone as a prominent facing material, which is consistent with the materials encouraged in the Design Guidelines. The mix of coarse ashlar limestone and honed northern buff limestone creates a contrast of textures that help to enhance the architectural variety of materials and finishes. Along with the limestone cladding, with fiber cement panels of neutral colors as well as storefronts to balance out the architectural composition. A pop of copper-colored metal panel framing the residential entry and overlook terrace helps to bring interest using a color that is classic and timeless.*
 - *Our design will implement products and design features that are consistent with Bridge Plaza, Prairie Care Medical center, Eide Bailly tower, Hotel Mankato, Profinium and Alltech, as well as phase two of the Civic Center, the historic Post Office, etc. Achieving the desired outcome of the downtown to be a regional MSA amenity is at the middle of our design intent as we focus on future generations' desire for a social hub of complimentary uses.*
- *8 – Signs should complement building appearance*
 - *Future retail signage is proposed within the storefront canopies and a full signage plan will be submitted with tenant buildout plans.*
- *10 – Improve alleys, parking lots and rear building entries to create a safe attractive and viable commercial and residential environment*
 - *The parking along S. Riverfront will have a planting buffer to create a safe and attractive separation from sidewalk to the parking.*
 - *The parking garage will have limited access points to reduce vehicle and pedestrian travel overlaps*

- *We are not proposing any alleys as they often have limited passive surveillance, thus increasing the safety of pedestrians in and around the development.*

- b. The applicant shall provide an updated plan for the sidewalk area along Warren Street that better coordinates with the Front Street corridor and provides increased pedestrian safety through the use of buffer zones.

ISG Response: We are revising the design to have the loading/unloading zone on the north side of Liberty Street as suggested by city staff.

- c. Applicant must provide a full set of updated plans that ensure full consistency across each plan. The existing submittal contains many inconsistencies.

ISG Response: See attached full set of updated plans.

- d. The applicant shall submit a plan to screen the parking in the surface parking area.

ISG Response: Landscape screening is shown on sheet C5-10 and is continuous along surface parking. Sea Green Junipers are proposed to provide year-round screening at a consistent 4' height once fully grown.

- e. Applicant shall provide detailed plans of the proposed exterior refuse enclosure. The enclosure must conform to City Code, including landscaping as required per Sec. 10-1743. Plans shall detail the location of any grease disposal for the restaurant.

ISG Response: Proposed exterior refuse enclosure will conform to City Code. Grease disposal will be located in the exterior refuse enclosure.

- f. Applicant must provide the proposed bike locker capacity shown and floor plans for the space.

ISG Response: A minimum of 75 bicycle spaces will be provided within the residential bike storage room.

- g. Applicant shall provide refuse truck turning movements.

ISG Response: Refuse truck turning movements have been added to sheet C3-00.

- h. Applicant shall provide an exhibit demonstrating proposed mechanical equipment locations and any required screening. Mechanical Equipment placements must conform to Mankato City Code. Rooftop mechanical equipment shall conform to Sec.10-1745 of the Mankato City Code.

ISG Response: The building elevations and section show roof top units and call out a factor-finish metal screening to match building facade for all roof top mechanical units exceeding 6 feet in height. Mechanical equipment placement and screening will conform to city code.

- i. The applicant shall provide an amenities plan for residents, particularly within the terrace area.

ISG Response: The private outdoor amenity deck will include a fenced in dog area with hose bib and waste receptacle for cleaning pet refuse, pergola, grill, fireplace, seating and open space. Refer to sheet C3.

- j. The applicant will need to coordinate with Public Safety well prior to beginning construction to ensure that the proposed construction does not impact public safety operations.

ISG Response: Acknowledged. This will be determined prior to building permit.

- k. Staff request clarification as to what is intended with the proposed stormwater treatment basin, particularly the “salvaged existing system to be reused” statement included within the plans.

ISG Response: There will be no salvaged system as shown on the utility plan. This note has been removed from the Proposed Drainage Map in the Stormwater Memorandum.

- l. Applicant shall provide planting details for the proposed landscaping plan in accordance with Mankato City Code.

ISG Response: Refer to added sheet C5-20.

- m. The applicant shall submit information address common area maintenance of the buildings and common areas.

ISG Response: Acknowledged. This will be submitted prior to building permit.

- n. Applicant shall submit an application for a License to Encroach that covers all proposed encroachments. This shall be requested for, and in place, prior to, or in conjunction with, the council review for the variance application. The application shall include an updated encroachment map.

ISG Response: License to Encroach application will be submitted via the city online portal prior to the Council review of the variance application.

- o. Applicant shall specify all proposed material finishes, including specific products, manufacturers, product sizes, product installation orientation, product finishes (i.e. precast concrete) and product specific colors (for that specified product).

ISG Response: See updated material board selections.

- p. Applicant shall provide a Hydrant coverage map.

ISG Response: See attached hydrant coverage map.

- q. Applicant shall provide an ADA site circulation plan for the development including the Right Of Way areas.

ISG Response: ADA routes from accessible stalls to public R.O.W have been added to sheet C3-00. All public walks will be accessible.

- r. Applicant shall provide window washing plans that detail actual utilization intentions.

ISG Response: Per Minnesota Building Code Section 1305.3114, windows located 38 feet or higher above an associated work surface must be provided with a safe window cleaning method in accordance with ANSI/IWCA I-14.1. The buildings in the proposed development will incorporate roof-mounted window cleaning anchor points/davits to allow professional window-washing contractors to safely access and clean exterior glazing from the roof using rope-descent systems.

- s. Applicant shall be responsible for any noise or light complaints from or by the development.

ISG Response: Acknowledged.

- t. Parking demand for the redevelopment shall not exceed the number of off-street parking provided per Mankato City Code. The applicant shall petition for the property to become part of the Downtown Parking District if the property does not conform.

ISG Response: The development is providing the number of off-street parking per Mankato City Code.

- u. Applicant shall be subject to SAC & WAC fees based on the City of Mankato assessment policy and fee schedule

ISG Response: Acknowledged.

- v. Applicant shall provide clarification regarding the availability of the ramp for public usage.

ISG Response: Market rate public parking will be allowed from 7am-5pm. There will be reserved residential parking between 5pm-7am, with remaining stalls available to the public.

- w. Due to the proposed street and parking closures, the applicant shall provide a plan detailing how they intend to provide alternative parking during the closure and ensure the most minimal impact the street and parking areas.

ISG Response: Street closure along Front Street will be temporary for utility hook-ups. The public parking stalls along the east side of Front Street will remain open during construction except for occasional deliveries and installations that will require a short-term closing of a few stalls. These parking closings will be communicated with the local business prior to the work being performed.

- x. Staff recommend that a signage plan is submitted in conformance with *Urban Design Framework Manual*.

ISG Response: A signage plan conforming to the Urban Design Framework Manual will be submitted with the tenant buildout plans.

- y. The applicant shall provide a narrative stating that the applicant understands that an occupancy restriction will be in place based on the proposed phasing of the project and that they agree to not occupy any of the Phase I spaces until Phase 2 is completed with all of the required parking. The City will withhold any certificate of occupancy for the property until all of the required parking is completed.

ISG Response: Acknowledged. It is anticipated that the office and mixed-use building structures will be constructed first. During the interior construction of those buildings, the parking ramp will be constructed. The two phases were in regard to construction sequencing. The development will be constructed in one phase.

- z. Applicant shall provide an updated Variance exhibit that visibly displays the lot coverage calculation areas.

ISG Response: The building has been pulled away from the Riverfront ROW to accommodate the 8-foot sidewalk width. This has reduced the overall building lot coverage to 75%, eliminating the need for a variance.

- aa. The applicant shall work with Kurt Klinder of the Mankato City to determine development addressing and vacate the existing addresses.

ISG Response: Acknowledged.

- bb. Applicant shall be aware that loading and unloading shall not interfere with the operation of adjacent uses or roadways. It shall not block parking spaces within development nor shall it block street parking and shall not occupy drive aisles required for ingress/egress to the development.

ISG Response: Acknowledged.

- cc. A minimum of a 26' drive aisle depth shall be maintained for the surface parking lot. The applicant shall provide updated plans that meet the minimum drive aisle depth.

ISG Response: The total required parking bay width of 63 feet is provided. Stall striping of 19 feet is preferred to visually make the drive lane smaller and slow vehicles down.

dd. Proposed ramp shall be sufficiently lit to ensure safety of tenants, including the under-ramp storage area.

ISG Response: Acknowledged.

ee. Applicant shall provide details on the proposed screening of the off-street loading area located along Liberty Street. See code for required off-street parking screening requirements.

ISG Response: Per the Liberty Street elevation, a 6 ft high wall has been provided as well as architectural perforated metal screening above the wall to further provide architectural interest and screening of the loading bay.

ff. The applicant shall submit a construction logistics plan addressing construction activity and contractor parking, including documented use and authorization of off-site parking lots. The updated logistics plan shall allow access for emergency vehicles to the block of South Front Street.

ISG Response: A construction logistics plan can be made available upon request. (Nathan Hermer noted, in an email, that an updated construction activity plan would not be submitted at this time) Contractor parking will be located on the proposed construction site in the Construction Laydown Area and / or in the public parking ramp across Warren Street. Near the end of the project the subcontractors will park in the recently completed parking ramp.

gg. The applicant shall be aware that separate meters will be required for residential and commercial usage.

ISG Response: Acknowledged.

hh. Applicant shall be aware that it is the City of Mankato's position that no truck activities (loading/unloading) shall take place on South Front Street.

ISG Response: Acknowledged. No loading/unloading is proposed on South Front Street.

ii. The applicant shall provide a waste management plan for any pet-related services that may be provided on site.

ISG Response: A hose bib and waste receptacle will be provided at the pet area. Residents will be encouraged to use both after using the pet area facility. Maintenance staff will also be responsible for daily cleaning.

jj. The applicant shall determine whether they would like to petition to join the Downtown Special Service District for maintenance.

ISG Response: Acknowledged. This will be determined prior to building permit.

kk. The applicant shall provide a ramp cleaning plan in accordance with applicable federal, state, and local laws.

ISG Response: Acknowledged. This will be provided prior to building permit.

ll. The applicant shall address all utility, traffic, and loading comments with the City Engineer. The applicant and City Engineer shall determine the including the following timing of submission of the following items:

- a. Applicant shall respond and address Engineering's staff comments on the traffic memo, particularly the need for collection of existing volume counts, tabulation of queue lengths and confirmation of new trips.

ISG Response: We will work with engineering staff to address comments regarding the traffic memo.

- b. Staff recommend that the proposed loading zone be removed from the south side of Warren Street. The Warren Street study (2020) recommends a revised future cross-section for Warren Street and adding an

additional new loading zone will cause issues with the feasibility and implementation of these future improvements.

ISG Response: We are removing the loading/unloading zone from the south side of Warren Street.

- c. Staff recommend that the proposed loading zone be located along the north curb line of Liberty Street. Liberty Street is a better candidate for a loading zone as it has significantly less volume and could function as a time restricted loading zone to still provide for parking during non-loading hours.

ISG Response: We have relocated the loading zone to Liberty Street as staff suggested.

- d. Applicant shall review sight triangle at intersection of Warren St and S Riverfront Dr and location of the proposed building to ensure sufficient operational sight distance.

ISG Response: According to Chapter 5, Sec. 5-20, the sight triangle is shown on sheet C3-00. Further evaluation of vehicular or pedestrian sight distances will be performed.

- e. Applicant shall respond and address Engineering's staff comments on the Stormwater Management Report.

ISG Response: Acknowledged. Engineering comments and design will be coordinated with the city engineer.

- f. The applicant shall provide proof of concept and supporting calculations of the underground treatment mechanism as design progresses.

ISG Response: Acknowledged. Engineering comments and design will be coordinated with the city engineer.

- g. Engineering Staff recommend discharging site stormwater to Liberty Street if elevations are supportive of implementing. Capacity and documented inundation at Warren/Riverfront pose risk to private infrastructure.

ISG Response: Outlet elevations will be reviewed and coordinated with city engineer.

- h. The applicant shall revise existing conditions hydraulic modeling to include an accurate assessment of current landuse, accounting for existing pervious surfaces present on the southwestern quadrant of the site. An evaluation of the existing inlet capacity, ponding, and bypass flows shall also be analyzed in full.

ISG Response: Acknowledged. Final hydraulic modeling will be submitted with building permit.

- i. The applicant shall be aware that City Staff conducted a field walk to observe conditions of the existing storm sewer following written concern of demolition and removal from adjacent property owners, citing water still flows through this infrastructure. Staff observed bulkheads and an absence of water in the system.

ISG Response: Acknowledged.

- j. The applicant shall remove all existing storm sewer and bulkhead existing pipes at the limits of construction. Where disturbance limits impact public right-of-way, storm sewer shall be removed (or replaced) to the greatest extent possible.

ISG Response: Acknowledged.

- k. The applicant shall be aware that casing will be required on any proposed storm sewer within the structural zone of influence, in accordance with building codes and LRFD Bridge and Structural Design Manual

ISG Response: Acknowledged.

- l. The applicant shall be aware that the City is discussing the possibility of a maintenance agreement for the underground treatment.

ISG Response: Acknowledged.

- m. Existing Emergency Vehicle Preemption (EVP) on Liberty Street for Riverfront Emergency Signal shall be required to be protected in place.

ISG Response: Acknowledged.

- n. Applicant shall further detail and clarify the encroachment plan. The extent of the encroachments both width and depth from the right of way line, should be fully detailed and dimensioned. Proposed and existing utilities should be shown to ensure proper maintenance work including replacement of the pipe can occur without impacting the building structure.

ISG Response: License to Encroach application will be submitted via the city online portal prior to the Council review of the variance application.

- o. Proposed development with food preparation and service shall have proper fat oil and grease separator designed as part of the utility plan.

ISG Response: Fat oil and grease separator will be included in the final utility design.

- p. Applicant shall provide for a minimum 8-foot sidewalk along east side of S Riverfront Drive.

ISG Response: Building design has been revised to accommodate an 8-foot public sidewalk that will encroach into private development.

- q. Applicant shall be aware that the existing storm sewer system downstream of the project site is susceptible to high intensity rainfalls (e.g. June 2024 event) and flooding does occasionally occur in this area of town. Staff recommend the proposed project design and storm sewer system include best management practices and provisions to minimize risk when flows exceed the local storm sewer system. Of particular concern is the lower levels of the proposed parking structure which may be located below the hydraulic grade line of the storm sewer system. The applicant should consider how these areas would respond to periodic flooding and propose solutions to minimize risk and ensure safety.

ISG Response: Acknowledged.

- r. Applicant shall be aware that the existing sanitary sewer system downstream of the project site is susceptible high flows. Larger capacity pipes in the area routinely run full with hydraulic grade lines above the pipe. Staff recommend the proposed project sanitary sewer system include best management practices and provisions to minimize risk (e.g. service backflow preventors).

ISG Response: Acknowledged.

- s. Applicant shall be encouraged to consider utilization and activation of the Front Street right of way via streetscape and similar type amenities to ensure that this development contributes to the success of Front Street as a pedestrian oriented downtown destination.

ISG Response: The public streetscape will include landscaping as shown on sheet C5-10 and the concrete walk will include the standard exposed aggregate banding finish.

- t. Applicant will be required to pay SAC and WAC connection charges.

ISG Response: Acknowledged.

- u. Applicant shall be aware that ROW obstruction fees will be incurred based on the proposed construction phasing plan.

ISG Response: Acknowledged.

- v. Applicant shall forward R/W tree planting plan to City Forester for review.

ISG Response: Acknowledged.

- w. Boulevard trees shall be replaced at a 2:1 ratio.

ISG Response: There are currently (11) boulevard trees planned for removal. The project anticipates (22) new trees to satisfy this requirement. The project also plans to protect (3) existing trees at the intersection of Liberty + Riverfront Dr.

- x. Sidewalk tree planting detail shall match City specifications, coordinate with the City.

ISG Response: Acknowledged.

- y. All sanitary, water, and storm services that are not being utilized by the new development shall be identified by the design team and depicted on the removals plan. Those services shall be abandoned to the respective main line.

ISG Response: Acknowledged.

- z. Sewer and Water Services – Larger water services shall be wet-tapped if the condition of the pipe will permit. When the Public Safety Center was remodeled, they could not wet tap due to the condition on the outside of the pipe. Sizes of sewer and water services are not noted on the utility plan; due to that the recommended types of connection would be prescribed at a later date. Proposed sanitary services on S. Front Street will require a connection to clay pipe (N. Service) and a connection to truss pipe (S. Service); design team to specify viable connections to those pipes. Coordinate with the City.

ISG Response: Acknowledged.

- aa. There are precast sanitary manholes adjacent to the two proposed services on Warren Street and service connections shall be made at adjacent precast sanitary manholes via an inside drop and modification to the bottom of the structure to add a dedicated invert for the new service.

ISG Response: Acknowledged.

- bb. 24" storm connection into manhole on Warren Street shall be core drilled being the structure is precast.

ISG Response: Acknowledged.

- cc. Street cuts into Warren Street shall be full width.

ISG Response: Acknowledged.

dd. Ex. 48", 72", & 127" abandoned Storm Drains traversing site shall be removed.

ISG Response: Acknowledged.

ee. Traffic Control Plan shall be incorporated into Civil Plans.

ISG Response: Acknowledged.

ff. The applicant shall protect City Fiber optic conduit running on west side of S. Front Street Between Warren Street and Liberty Street.

ISG Response: Acknowledged.

gg. If not already complete, the applicant shall log into the City's online portal and make notification fee payment.

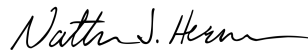
ISG Response: All invoices have been paid and no outstanding fees are shown in the city online portal at this time.

Thank you again for reviewing the application and attached materials. Please contact us with any questions or if there is any additional information we can provide in support of this project. Andrea Rand is the application coordinator and her contact is Andrea.Rand@ISGInc.com or 952.426.0699. Nate Hermer is the project manager and civil engineer and his contact information is Nathan.Hermer@ISGInc.com or 507-387-6651.

Sincerely,



Andrea Rand, AICP
Development Services Coordinator



Nate Hermer, PE
Project Manager