



145 Good Counsel Drive
Mankato, MN 5600

August 18, 2026

VIA EMAIL ONLY

City of Mankato
Attn: Molly Westman
Intergovernmental Center
10 Civic Center Plaza
Mankato, MN 56001
Email: mwestman@mankatomn.gov

RE: Request by applicant Southwest Minnesota Housing Partnership (“SWMHP”) for an amendment to the planned unit development (“PUD”) approved by the City Council on May 11, 2026, to allow for the usage of Scheid Hall and to allow for parking lot and related infrastructure improvements at the property located at 170 Good Counsel Drive, Mankato, Minnesota, identified as Blue Earth County Tax Parcel Nos. R01.09.05.379.005 and R01.09.08.201.007, legally described as Outlot B, School Sisters of Notre Dame Subdivision, which is proposed to be re-platted as Good Counsel Hill Subdivision

Dear Ms. Westman:

The undersigned comprise the Board of Governors of Crusader Holdings LLC, a Minnesota limited liability company (“Crusader”) which owns the real property upon which Loyola Catholic School (“Loyola”) is located. Loyola is located immediately adjacent to the property in the PUD Application. We appreciate the opportunity to again provide comments regarding SWMHP’s proposed redevelopment of the School Sisters property. We previously provided written comments to the City of Mankato Planning Commission for its meeting on April 22, 2026 and supported City staff’s recommendation to limit Phase 1 of SWMHP’s proposed development by the amount of code-compliant parking spaces available on the applicant’s property.

We understand that SWMHP is now requesting to amend the PUD (the “PUD Amendment”) to further reduce the parking spaces contemplated by applicant’s proposed development. We write to express our opposition to the proposed PUD Amendment and any reduction in the minimum number of off street parking stalls required by City Code.

The Proposed PUD Amendment does not provide adequate parking

The applicant's proposed PUD Amendment does not have sufficient parking. There is no reason to deviate from City Code's required minimum off street parking requirements for the reasons identified in our previous correspondence dated April 15, 2026 and April 21, 2026, namely:

- Shared parking arrangement is not applicable to authorize reduction in required parking.
- There is no public transportation available to the property that would authorize a reduction in required parking.
- There is no space available for on-street parking.
- The City of Mankato's Code of Ordinances does not authorize the "proof of parking" sought by the applicant.

The PUD Amendment proposes to improperly reduce parking even further than the original PUD. In its PUD Application submitted January 27, 2026 and as originally proposed in its PUD Application for consideration in April 2026, applicant SWMHP's analysis of City Code identified 464 parking stalls required based on the applicant's proposed uses. The PUD Application requested that the City consider a proposal of 358 total parking stalls utilizing both shared parking and proof of parking. Through the PUD Amendment, the applicant is now requesting to further reduce the available parking to a total of 239 parking stalls. This is dramatically short of the applicant's own analysis of required parking stalls.

Inadequate parking will detrimentally impact Loyola operations and safety

Traffic patterns within the school property are scripted to ensure maximum safety and operational efficiency during peak times. SWMHP's proposed redevelopment, without the minimum requirements required by City Code, can only be expected to cause the applicant's proposed tenants and visitors to utilize Loyola's parking lot because there is no other parking, transit, or on street parking available on the hill. This unpermitted use would have a detrimental impact on school operations, put a burden on Loyola to regulate and monitor its own parking lot, and would impact the ability of Loyola constituents to find onsite parking for school events. As explained in more detail in our previous correspondence, Loyola is concerned that a lack of parking in the proposed development will impact student and staff safety.

City Code dictates minimum parking requirements and does not require balancing factors,

The City Code prescribes minimum parking requirements and does not require balancing factors, such as the applicant's financing sources, the applicant's purported business need for parking, or environmental attributes.

The applicant's proposed financing sources for its redevelopment are not relevant to the City's parking requirements. The City Code applies equally to a developer that seeks to fund improvements to properties through their own resources as a developer that seeks to fund the same improvements through external financing. An applicant's proposed financing sources do not change the requirements set forth in City Code.

The applicant's purported business need for parking cannot justify a reduction in minimum off-street parking requirements. The City Code specifies the number of required off-street parking stalls based on the use of the property and does not permit an applicant to "opt out" of providing the minimum required off street parking.

The geographic constraints cited by the Applicant – namely "adding parking in a convenient and sensible location" – also do not justify deviating from the minimum off-street parking required by City Code. The geographic features of a property may limit the amount of parking that such property may support; however, the applicant's proposed uses determine the amount of parking required by the proposed development. With respect to the requested PUD Amendment, the geographic constraints of SWMHP's property illustrate Crusader's concern that the lack of parking will detrimentally impact Loyola because there is no alternative parking available on the hill.

Conclusion

We did not have objection to the City staff's previous recommendation to permit a portion of the applicant's Phase 1 Development expressly limited by the number of code compliant parking spaces meeting the minimum off street parking requirements for a permitted use. We urge the Planning Commission and City staff to closely scrutinize parking for the applicant's contemplated development and we object to any deviation from the required minimum off street parking for the applicant's proposed development.

Because the PUD Amendment does not provide adequate parking based on the proposed uses, Crusader respectfully requests the Planning Commission and the City deny the PUD Amendment as proposed by SWMHP.

Sincerely,

CRUSADER HOLDINGS LLC

Reggie Reed
Tony Rotchadl
Adrienne Fahrforth
Father Tom Melvin (ex-officio, Loyola Board of Trustees)