CITY OF CHASKA

CARVER COUNTY, MINNESOTA

RESOLUTION

DATE NOVEMBER 17, 2025 RESOLUTION NO. 2025-85

MOTION BY COUNCILMEMBER HATFIELD **SECOND BY COUNCILMEMBER** GRAU

A Resolution approving the AUAR Order and Scoping Document for Big Woods Business Park/City of Chaska/PC #2025-20

WHEREAS, as the Responsible Governmental Unit (RGU), the City of Chaska has determined that an Alternative Urban Areawide Review (AUAR) is required for the proposed development of the site northwest of Chaska Boulevard and Highway 212 (also known as Big Woods Business Park); and

WHEREAS, the AUAR study area encompasses an area totaling approximately 359 acres on 17 parcels in the City of Chaska and Dahlgren Township, Carver County, Minnesota; and

WHEREAS, two parcels within the AUAR study area are located within Dahlgren Township; these parcels are intended to be annexed into the City of Chaska; and

WHEREAS, the project is proposed by Scannell Properties; and

WHEREAS, the Big Woods Business Park development contains development of approximately 2-3 million square feet; and

WHEREAS, therefore, pursuant to Minnesota Rule 4410.4400, subpart 11A, a Mandatory Environmental Impact Statement (EIS) is required as the industrial project is greater than 450,000 square feet in size; and

WHEREAS, the Alternative Urban Areawide Review (AUAR) process substitutes for any EAW or EIS required for specific qualifying projects, provided they comply with the review assumptions and mitigation measures; and

WHEREAS, the notice of availability of the Draft AUAR Order and Scoping Document was published in the Minnesota Environmental Quality Board's EQB Monitor on September 23, 2025; and

WHEREAS, the Scoping Document, included as Attachment A, was available for review and comment as part of the AUAR process as described in Minnesota Rules, part 4410.3610, subpart 5a; and

WHEREAS, the 30-day comment period began on September 23, 2025 and closed at 4:00 PM on October 23, 2025; and

WHEREAS, during the public comment period, comments were received from five government agencies and are included in Attachment C. Pursuant to Minnesota Rules, part 4410.3610, subpart

5a(C), the purpose of the comments on a Scoping Document for an AUAR is to suggest additional development scenarios and relevant issues to be analyzed in the review; and

WHEREAS, comments may suggest alternatives to the specific large project or projects proposed to be included in the review, including development at sites outside of the proposed geographic boundary; and

WHEREAS, the comments must provide reasons why a suggested development scenario or alternative to a specific project is potentially environmentally superior to those identified in the RGU's draft order; and

WHEREAS, responses to the comments received are included in Attachment B; and

NOW, THEREFORE, BE IT RESOLVED, that the City Council of the City of Chaska, Minnesota hereby approves the AUAR Order and Scoping Document for Big Woods Business Park.

Passed and adopted by the City Council of the City of Chaska, Minnesota, this 17th day of November, 2025.

Taylor Hubbard, Mayor

Attest Vicki L Schmid
Deputy Clerk

TO: Interested Parties (Including Minnesota Environmental Quality Board Distribution List)

FROM: Elizabeth Hanson, AICP
City Planner
City of Chaska

DATE: November 25, 2025

SUBJECT: Final Order for the City of Chaska Big Woods Business Park Alternative Urban Areawide Review

As the Responsible Governmental Unit (RGU), the City of Chaska has determined that an Alternative Urban Areawide Review (AUAR) is the appropriate form of environmental review for the proposed Big Woods Business Park.

This document constitutes a final order for review. The notice of availability of the Draft AUAR Order and Scoping Document was published in the Minnesota Environmental Quality Board's (EQB) Monitor on September 23, 2025. The scoping document was available for review and comment as part of the AUAR process as described in Minnesota Rules, part 4410.3610, subpart 5a. The 30-day comment period began on September 23, 2025 and closed at 4:00 PM on October 23, 2025.

During the public comment period, comments were received from five government agencies. Comments are included in Attachment C. Pursuant to Minnesota Rules, part 4410.3610, subpart 5a(C), the purpose of the comments on a Scoping Document for an AUAR is to suggest additional development scenarios and relevant issues to be analyzed in the review. Comments may suggest alternatives to the specific large project or projects proposed to be included in the review, including development at sites outside of the proposed geographic boundary. The comments must provide reasons why a suggested development scenario or alternative to a specific project is potentially environmentally superior to those identified in the RGU's final order. Responses to the comments received are included in Attachment B.

AUAR Study Area

The AUAR study area encompasses an area totaling approximately 359 acres on 17 parcels in the City of Chaska and Dahlgren Township, Carver County, Minnesota (shown on Figure 1). The study area is located northwest of Chaska Boulevard and US 212. Two parcels within the AUAR study area are located within Dahlgren Township; these parcels are intended to be annexed into the City of Chaska.

Development Scenarios

Two development scenarios, defined in Table 1 and shown on Figures 2 and 3, are proposed to be evaluated in the AUAR. Scenario 1 and Scenario 2 both include Business Park (industrial/office) and Commercial land uses.

- Scenario 1: (Figure 2) represents the lower density development scenario
- Scenario 2: (Figure 3) represents the higher density, maximum build scenario

Table 1: AUAR Development Scenarios

Component	Scenario 1	Scenario 2
Business Park Building Area (square feet)	1,800,000 sq ft	2,700,000 sq ft
Commercial Building Area (square feet)	200,000 sq ft	300,000 sq ft
Rural Residential / Greenbelt	76 ac	76 ac
Open Space (Acres)	39 ac	39 ac
Total (square feet)	2,000,000 sq ft	3,000,000 sq ft
Total Project Area	359 Acres	359 Acres

Figure 1: AUAR Study Area

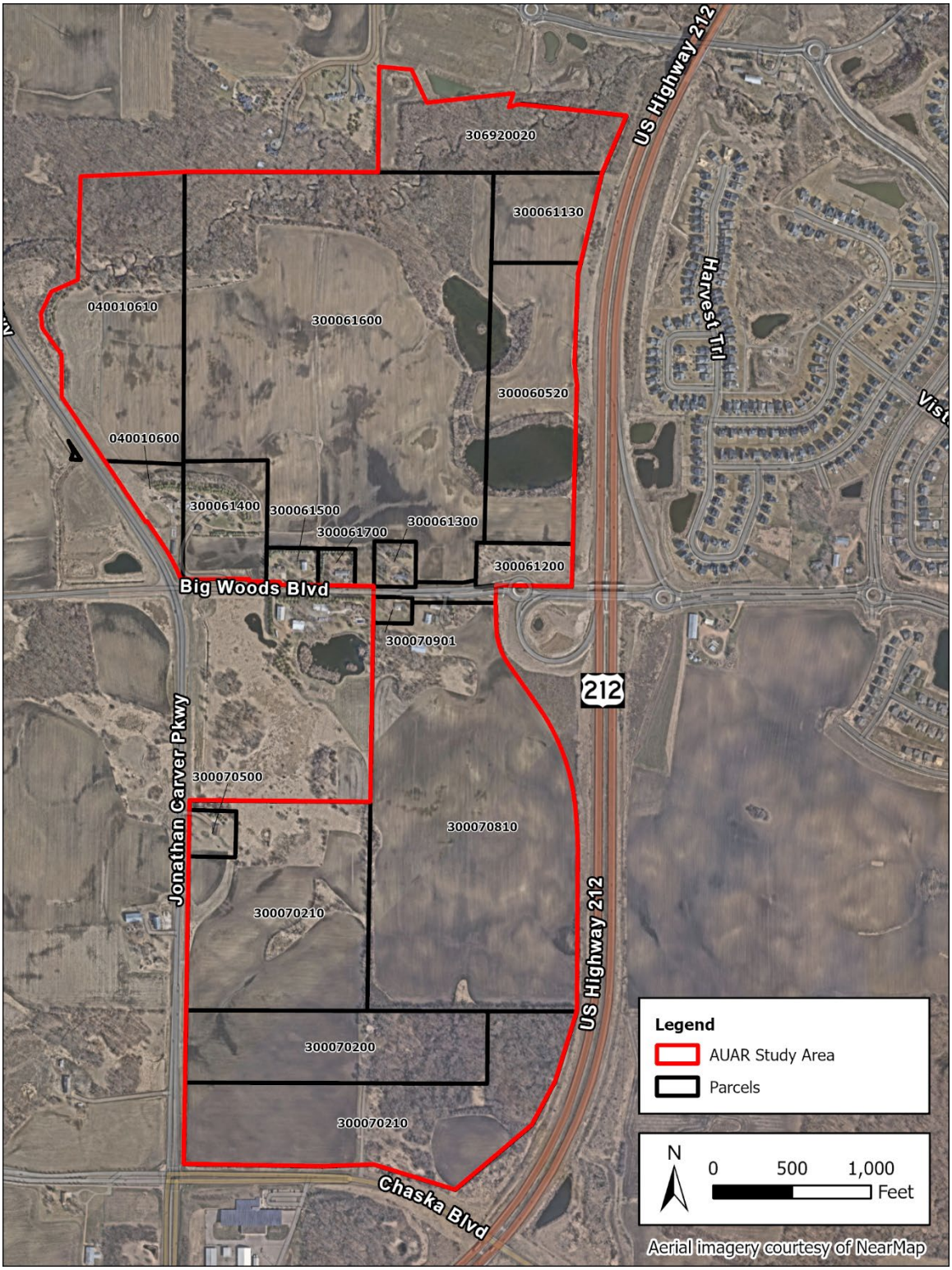


Figure 2: AUAR Study Area – Scenario 1

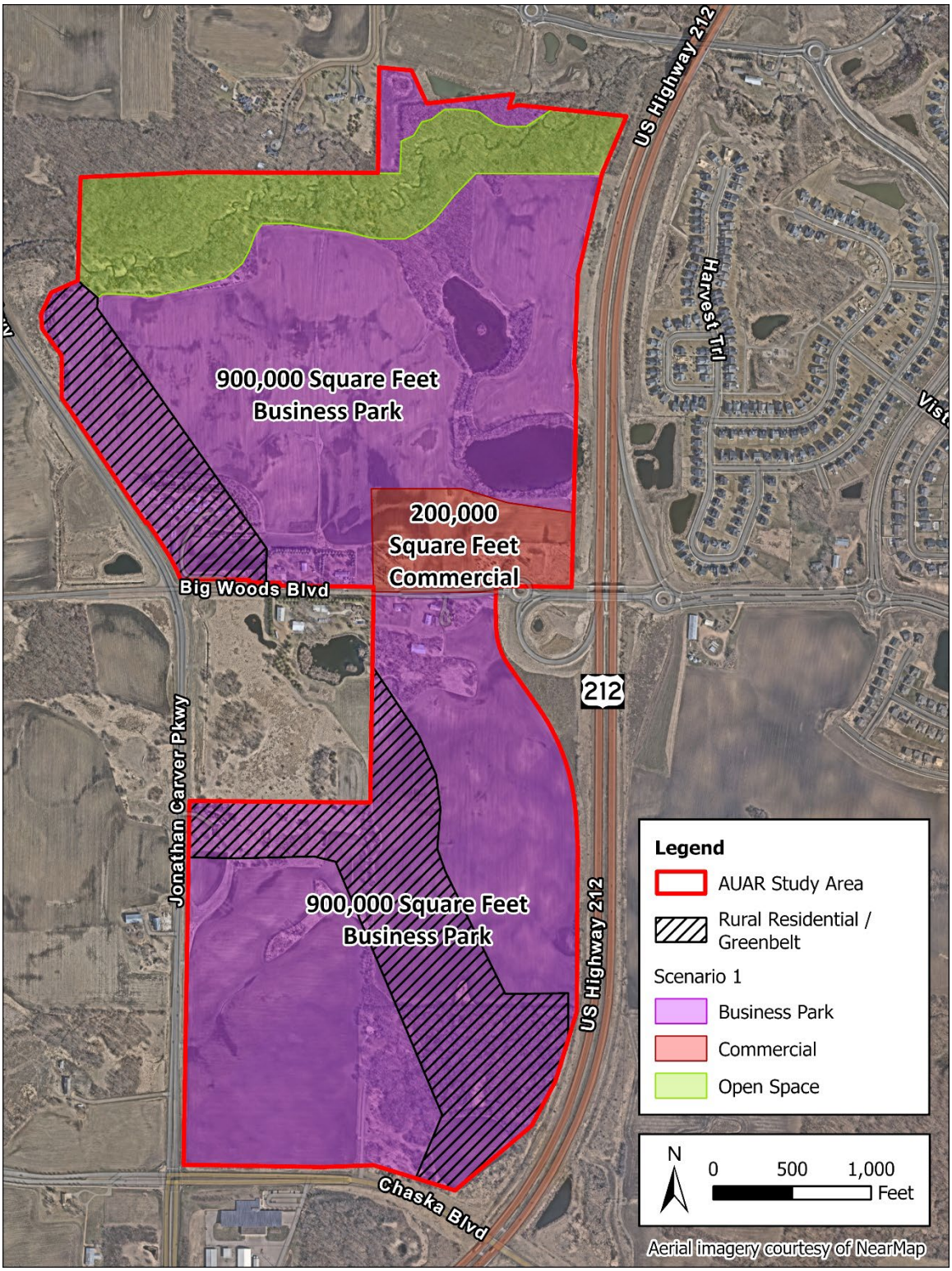
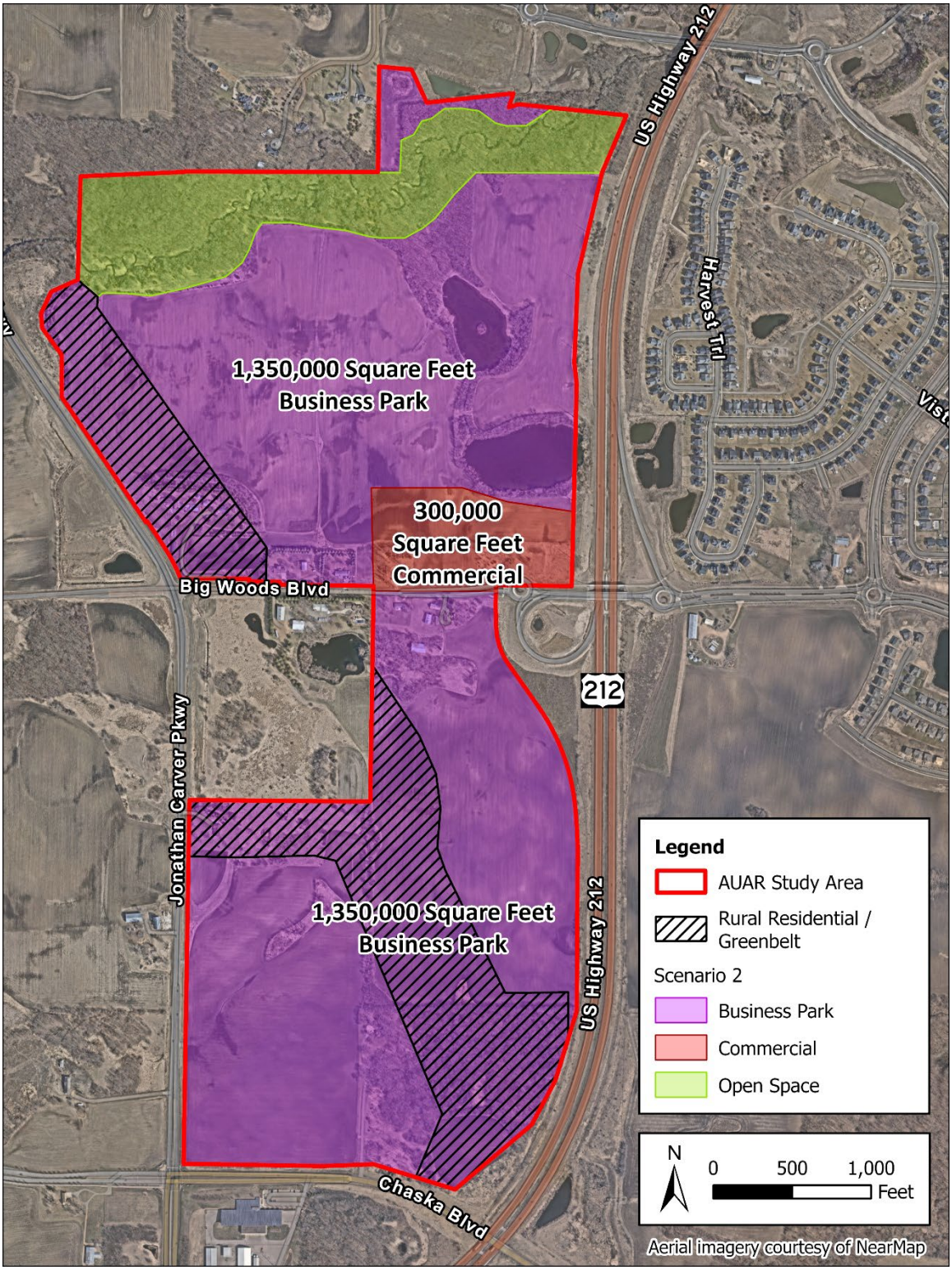


Figure 3: AUAR Study Area – Scenario 2



ATTACHMENT A: FINAL SCOPING DOCUMENT

Big Woods Business Park AUAR

FINAL SCOPING DOCUMENT

NOVEMBER 2025

PREPARED FOR:

City of Chaska

PREPARED BY:

Kimley»Horn

Table of Contents

List of Tables

List of Figures

List of Attachments

Attachment A: Final Scoping Document
Attachment B: Comment Responses
Attachment C: Comment Letters

Scoping Document

This EAW form is being used to delineate the issues and analyses to be reviewed in an Alternative Urban Areawide Review (AUAR). Where the AUAR guidance provided by the Minnesota Environmental Quality Board (EQB) indicates that an AUAR response should differ notably from what is required for an EAW, the guidance is noted in *italics.*

Note to reviewers: Comments must be submitted to the Responsible Governmental Unit (RGU) during the 30-day comment period following notice of the Scoping Document in the *EQB Monitor*.

1. PROJECT TITLE

Big Woods Business Park AUAR

2. PROPOSER

Proposer: Scannell Properties #771, LLC
Contact Person: Jake Kurth
Address: 8801 River Crossing Blvd, Suite 300
City, State, ZIP: Indianapolis, IN 46240
Phone: 612-280-4088
Email: jakek@scannellproperties.com

3. RGU

RGU: City of Chaska
Contact Person: Elizabeth Hanson, AICP
Title: City Planner
Address: One City Hall Plaza
City, State, ZIP: Chaska, MN 55318
Phone: 952-448-9200
Email: EHanson@chaskamn.gov

4. REASON FOR PREPARATION

AUAR Guidance: Not applicable to an AUAR.

5. PROJECT LOCATION

County: Carver
City/Township: Chaska
PLS Location (¼, ¼, Section, Township, Range): Township 115N Range 23W Sections 6 and 7
Watershed (81 major watershed scale): Minnesota River - Shakopee
Tax Parcel Numbers: 040010610, 040010600, 306920020, 306920020, 300061130, 040010610, 300061600, 300060520, 300061500, 300061700, 300061300, 300061200, 300070901, 300070500, 300070810, 300070210, 300070200
At a minimum, attach each of the following to the AUAR:

- **US Geological Survey 7.5 minute, 1:24,000 scale map indicating project boundaries** (See Figure 1)
- **Map depicting the boundaries of the AUAR and any subdistricts used in the AUAR analysis** (see Figure 2)
- List of data sources, models, and other resources (from the Item-by-Item Guidance: Climate Adaptation and Resilience or other) used for information about current Minnesota climate trends and how climate change is anticipated to affect the general location of the project during the life of the project (as detailed below in Item 7)
- **Cover type map as required for Item 8** (See Figure 5)
- **Land use and planning and zoning maps as required in conjunction with Item 10** (See Figure 6, Figure 7, and Figure 8)

Figure 1: USGS Map

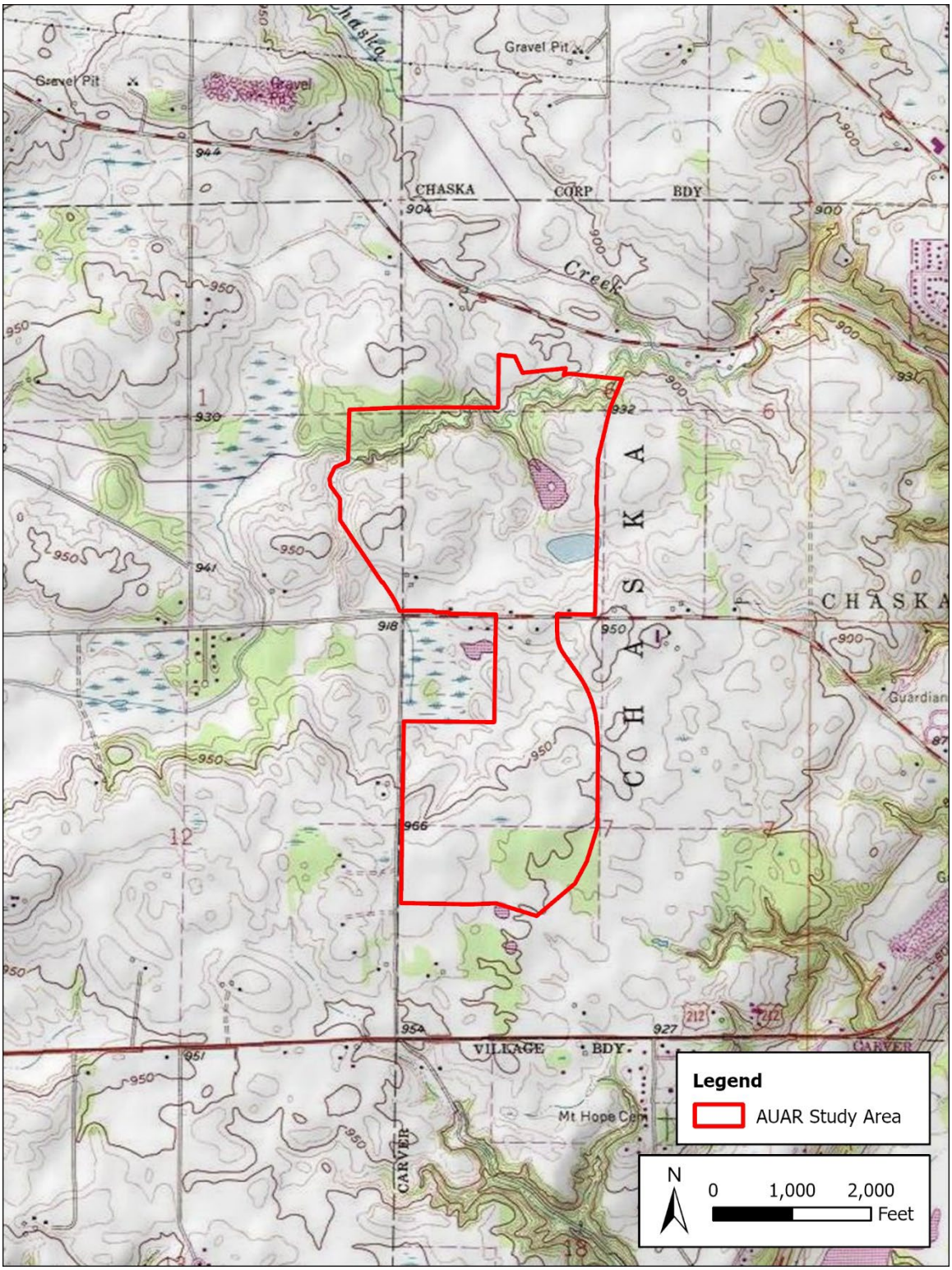
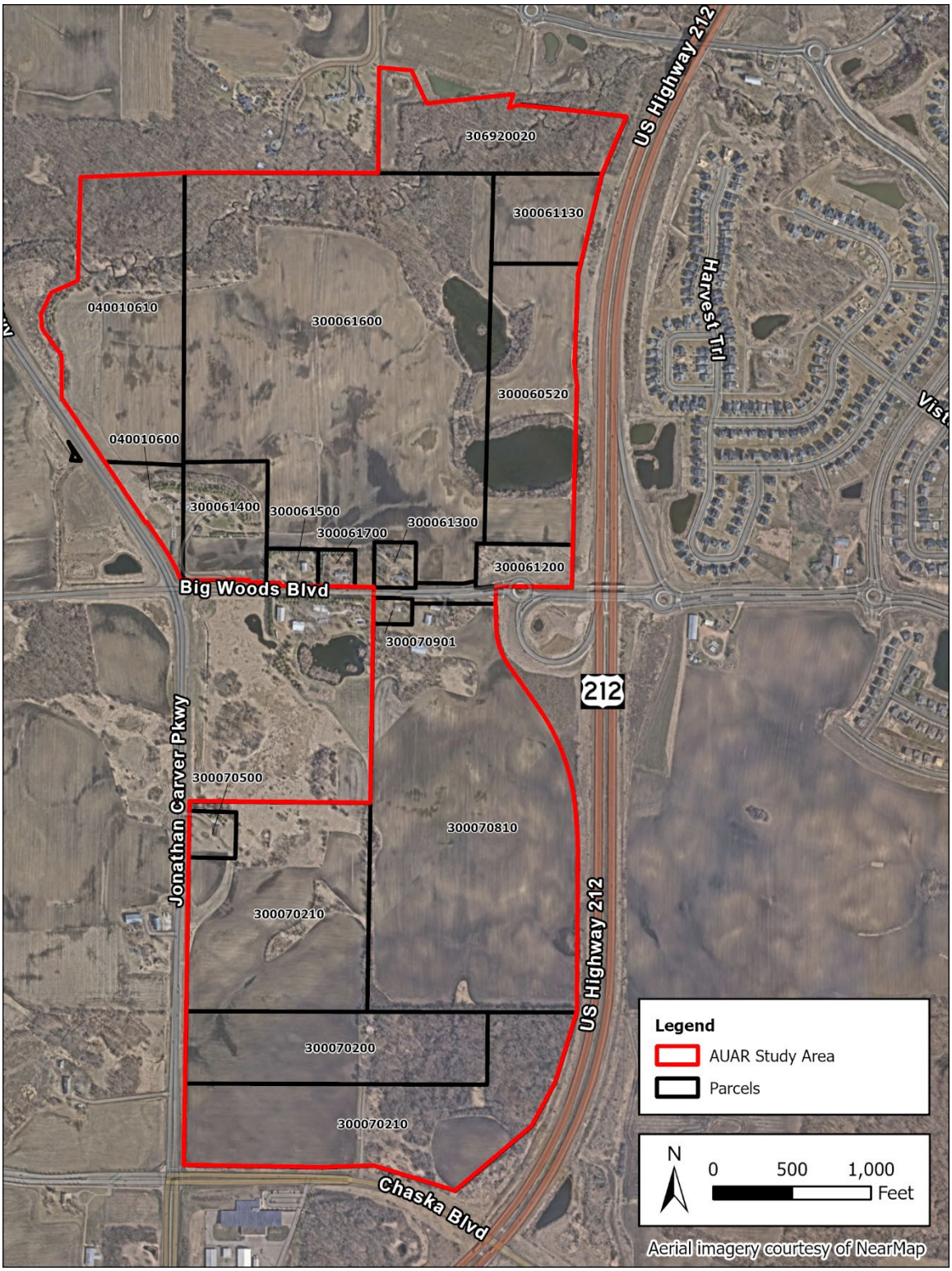


Figure 2: Study Area



6. PROJECT DESCRIPTION

AUAR Guidance: Instead of the information called for on the EAW form, the description section of an AUAR should include the following elements for each major development scenario included:

- *Anticipated types and intensity (density) of residential and commercial/warehouse/light industrial development throughout the AUAR area.*
- *Infrastructure planned to serve development (roads, sewers, water, stormwater system, etc.). Roadways intended primarily to serve as adjoining land uses within an AUAR area are normally expected to be reviewed as part of an AUAR. More "arterial" types of roadways that would cross an AUAR area are an optional inclusion in the AUAR analysis; if they are included, a more intensive level of review, generally including an analysis of alternative routes, is necessary.*
- *Information about the anticipated staging of various developments, to the extent known, and of the infrastructure, and how the infrastructure staging will influence the development schedule.*

The AUAR study area encompasses an area totaling approximately 359 acres on 17 parcels in the City of Chaska and Dahlgren Township, Carver County, Minnesota (shown on Figure 2). The study area is generally bounded to the north by Creek Road, to the west by Jonathan Carver Parkway, to the south by Chaska Boulevard, and to the east by US 212. Two parcels within the AUAR study area were formerly located within Dahlgren Township (shown on Figure 2). These parcels are intended to be annexed into the City of Chaska. Dahlgren Township and the City of Chaska adopted an Orderly Annexation Agreement for these parcels on September 8, 2025. The agreement outlines the terms and conditions under which an annexation would take place.

Two scenarios are proposed for evaluation in the AUAR as outlined in Table 1. Scenario 1 includes multiple buildings for a total of 1.8 million square feet of proposed business park (office/industrial) development and 200,000 square feet of proposed commercial development (see Figure 3). Scenario 2 includes multiple buildings for a total of 2.7 million square feet of proposed business park (office/industrial) development and 300,000 square feet of proposed commercial development (see Figure 4). Both scenarios would include a natural buffer area bisecting the study area from north to south. This aligns with the City's desire to see a natural buffer between land uses. This natural buffer area is part of Chaska's Greenbelt, an edge of open space or low-density rural residential use along the edge of the City. Both scenarios would also include an approximately 4-acre area for a city substation to support future development. Coordination with Minnesota Valley Electric Cooperative (MVEC) will continue to determine infrastructure upgrades and additions needed.

The intent of the AUAR is to recognize the worst-case potential impacts and identify mitigation measures that may be taken to compensate for those impacts. Preliminary construction work is anticipated to begin as early as summer 2026. The study area will be constructed in phases with the full build out anticipated to occur over 5-15 years.

A more detailed discussion of infrastructure needs will be included in the AUAR.

Table 1: Development Scenario

Component	Scenario 1	Scenario 2
Business Park Building Area (square feet)	1,800,000 sq ft	2,700,000 sq ft
Commercial Building Area (square feet)	200,000 sq ft	300,000 sq ft
Rural Residential / Greenbelt	76 ac	76 ac
Open Space (Acres)	39 ac	39 ac
Total (square feet)	2,000,000 sq ft	3,000,000 sq ft
Total Project Area	359 Acres	359 Acres

Figure 3: Development Scenario 1

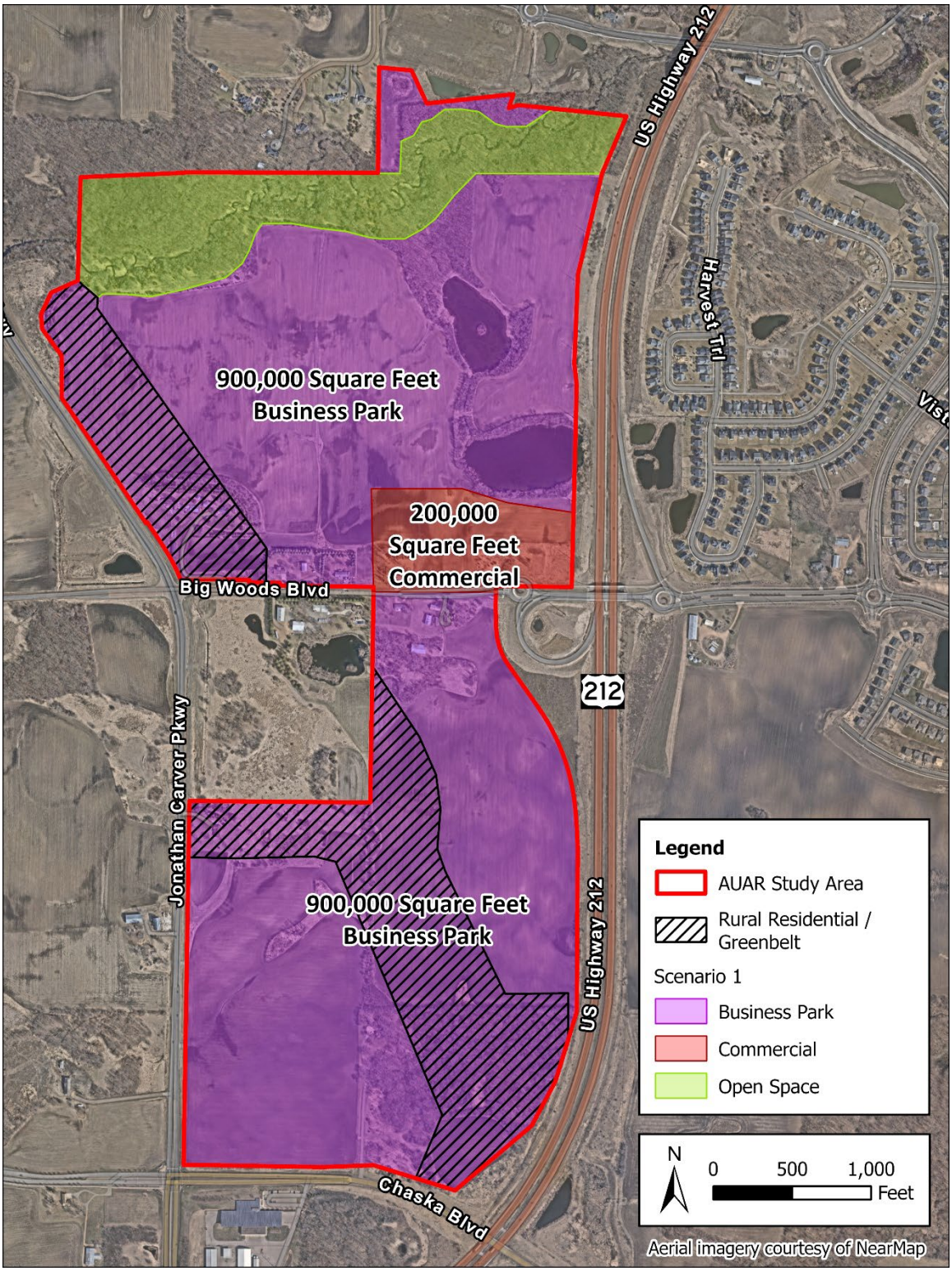
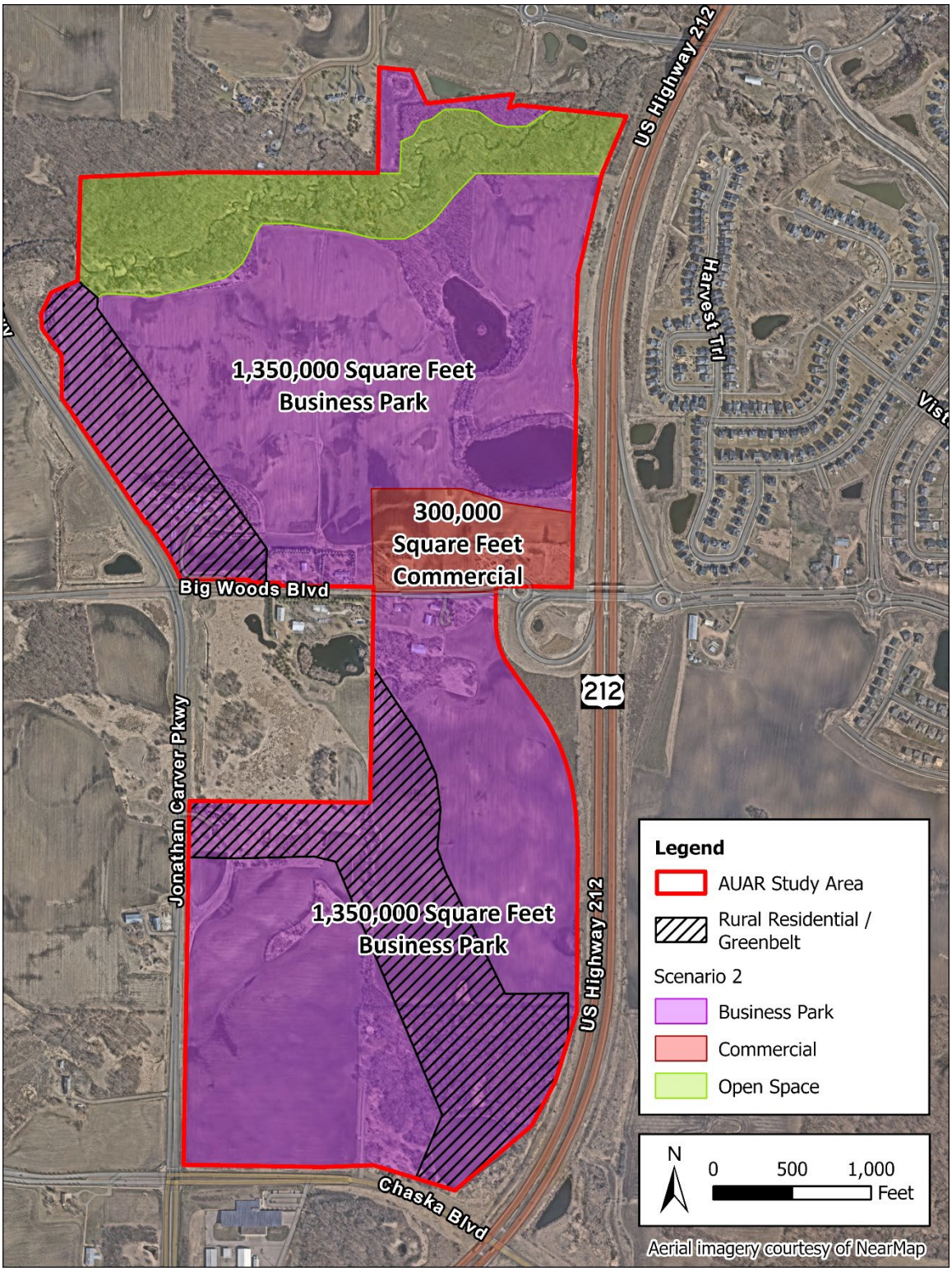


Figure 4: Development Scenario 2



7. CLIMATE ADAPTION AND RESILIENCE

a. Describe the climate trends in the general location of the project (see guidance: Climate Adaptation and Resilience) and how climate change is anticipated to affect that location during the life of the project.

The AUAR will describe trends in temperature, urban heat island, precipitation, flood risk, and cooling degree days for the proposed uses in the study area. Climate projections will use Representative Concentration Pathways (RCPs), which are greenhouse gas concentration scenarios used by the Intergovernmental Panel on Climate Change. RCP 4.5 is an intermediate scenario in which emissions decline after peaking around 2040, and RCP 8.5 is a worst-case scenario in which emissions continue to rise through the 21st century.[1]

b. For each resource category in the table below, describe the project's proposed activities and how the project's design will interact with those climate trends. Describe proposed adaptations to address the project effects identified.

Table 2: Interaction of Proposed Activities with Each Climate Trend and Projection Listed in 7a

Resource Category	Climate Trends and Climate Projections	Project Components	Potential Environmental Effects	Adaptation Strategies
Project Design	The AUAR will discuss aspects of building architecture/ materials choices and site design that could impact climate.	To be discussed in AUAR	To be discussed in AUAR	To be discussed in AUAR
Land Use	The AUAR will discuss critical facilities and flood risk.	To be discussed in AUAR	To be discussed in AUAR	To be discussed in AUAR
Water Resources	The AUAR will discuss current Minnesota climate trends and anticipated climate change in the general location of the project and how that may influence water resources.	To be discussed in AUAR	To be discussed in AUAR	To be discussed in AUAR

[1] Climate Explorer Metadata. Available at https://www.dnr.state.mn.us/climate/climate-explorer-metadata.html.

Resource Category	Climate Trends and Climate Projections	Project Components	Potential Environmental Effects	Adaptation Strategies
Contamination / Hazardous Materials/ Wastes	The AUAR will discuss current Minnesota climate trends and anticipated climate change in the general location of the project and how that may influence the potential environmental effects of generation/use/storage of hazardous waste and materials.	To be discussed in AUAR	To be discussed in AUAR	To be discussed in AUAR
Fish, Wildlife, Plant Communities, and Sensitive Ecological Resources (Rare Features)	The AUAR will discuss current Minnesota climate trends and anticipated climate change in the general location of the project how that may influence the local species and suitable habitat.	To be discussed in AUAR	To be discussed in AUAR	To be discussed in AUAR

8. COVER TYPES

AUAR Guidance: The following information should be provided:

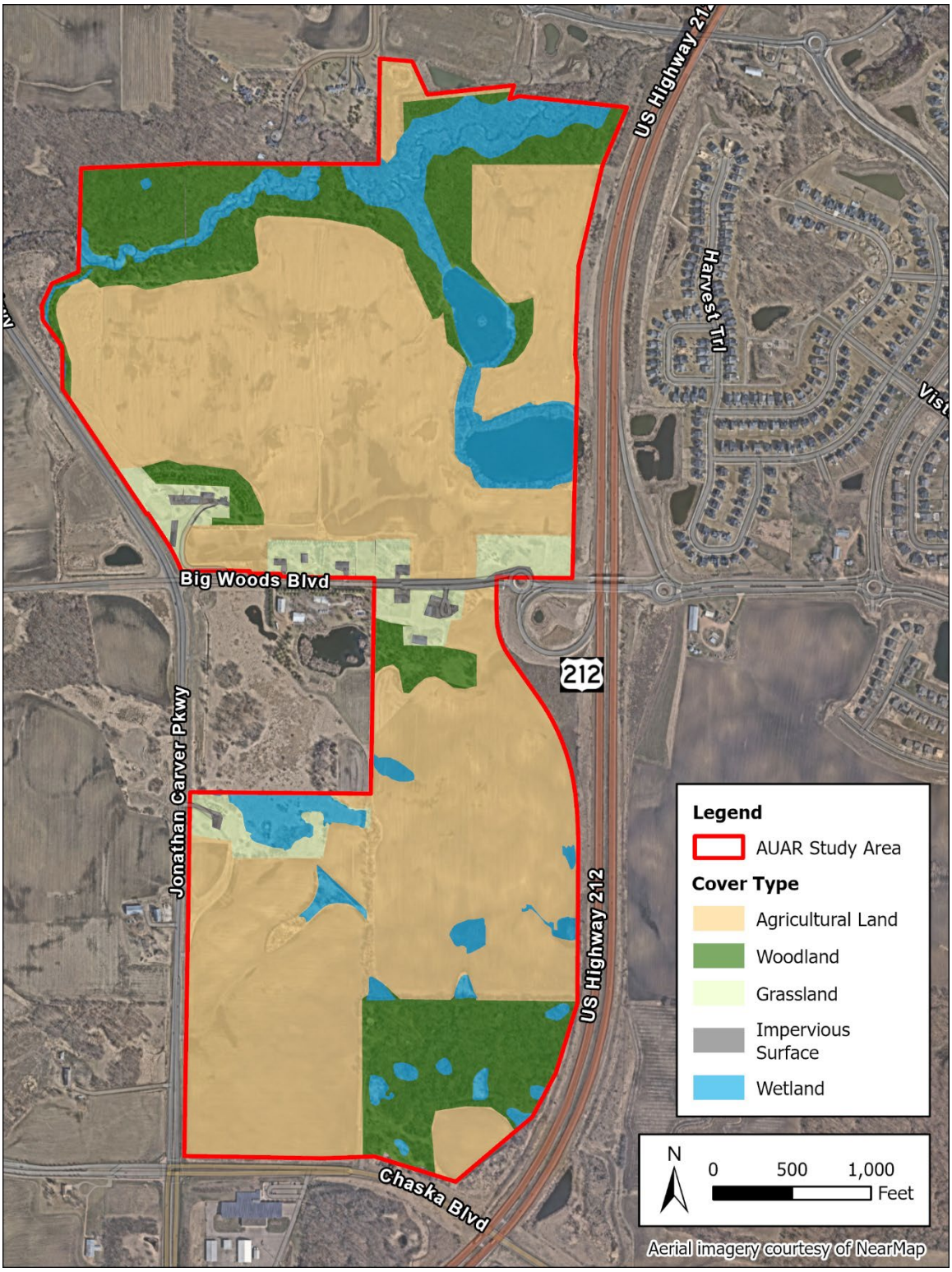
- *A cover type map, at least at the scale of a USGS topographic map, depicting:*
  - *Wetlands (identified by Circular 39 type)*
  - *Watercourses (rivers, streams, creeks, ditches)*
  - *Lakes (identify public waters status and shoreland management classification)*
  - *Woodlands (break down by classes where possible)*
  - *Grassland (identify native and old field)*
  - *Cropland*
  - *Current development*
- *An overlay map showing anticipated development in relation to the cover types. This map should also depict any "protection areas," existing or proposed, that will preserve sensitive cover types. Separate maps for each major development scenario should be generally provided.*

The AUAR study area is approximately 359 acres of woodland, water features, grassland, agricultural land, and impervious surface. There are several structures, mainly single-family homes and farmstead buildings, within the study area. The AUAR will include an analysis of existing and proposed cover types within the study area that are shown on Figure 5. These cover types were determined by reviewing recent aerial photography and National Wetlands Inventory (NWI) data for wetland boundaries.

Table 3: Existing Cover Types

Cover Type	Existing (Acres)
Woodland	62.6
Grassland	17.8
Agricultural Land	234.7
Wetlands	40.3
Impervious Surface	3.9
Total	**359.3**

Figure 5: Cover Types



9. PERMITS AND APPROVALS REQUIRED

AUAR Guidance: A listing of major approvals (including any comprehensive plan amendments and zoning amendments) and public financial assistance and infrastructure likely to be required by the anticipated types of development projects should be given for each major development scenario. This list will help orient reviewers to the framework that will protect environmental resources. The list can also serve as a starting point for the development of the implementation aspects of the mitigation plan to be developed as part of the AUAR.

Table 4: Anticipated Permits and Approvals

Unit of Government	Type of Application	Status
Federal		
US Army Corps of Engineers	Section 404 Permit	To be applied for, if applicable
State		
Minnesota Pollution Control Agency	Section 401 Water Quality Certification	To be applied for, if applicable
	National Pollutant Discharge Elimination System Stormwater Permit for Construction Activities	To be applied for, if applicable
	Sanitary Sewer Extension Permit	To be applied for, if applicable
	Construction Contingency Plan and Response Action Plan approval	To be applied for, if applicable
Minnesota Department of Natural Resources	Temporary Groundwater Appropriation Permit for Construction Dewatering	To be applied for, if applicable
	Utility Crossing License	To be applied for, if applicable
Minnesota Department of Health	Water Main Installation Permit	To be applied for, if applicable
Minnesota Department of Transportation	Miscellaneous Work on Trunk Highway Right of Way	To be applied for, if applicable
Regional		
Metropolitan Council	Sewer Connection/Extension Permit	To be applied for, if applicable
County		
Carver County	Building Permit	To be applied for, if applicable
	Application for Water Management Rules Conformance and Approval	To be applied for, if applicable
	County Right of Way Permit	To be applied for, if applicable
City		
City of Chaska	Concept/Preliminary/Final Plat	To be applied for, if applicable
	Zoning	To be applied for, if applicable
	Comprehensive Plan Amendment	To be applied for, if applicable
	Road, Sewer, and Water Feasibility Study	To be applied for, if applicable
	Grading Permit	To be applied for, if applicable

Unit of Government	Type of Application	Status
	Development Agreement	To be applied for, if applicable
	Completion of the Orderly Annexation Process with Dahlgren Township	To be completed
	Land Use/Development Application	To be applied for, if applicable
	Building Permit	To be applied for, if applicable
	Demolition Permit	To be applied for, if applicable
	AUAR Approval	In process

*Note: Coordination with MVEC will continue as design advances, and future permitting/approvals may be required.

10. LAND USE

a. Describe:

i. Existing land use of the site as well as areas adjacent to and near the site, including parks, trails, and prime or unique farmlands.

The AUAR study area is located in a rural area in the southwest corner of Chaska, Minnesota, and includes two parcels within Dahlgren Township (west of Chaska). The study area consists of 17 existing parcels. According to data from the Metropolitan Council[2] and aerial imagery, the majority of the study area is currently used as agricultural land, with some areas of undeveloped land and single family residential (see Figure 6). Land uses adjacent to the study area include agricultural land and single-family residential use.

There is one recreational feature in the vicinity of the AUAR study area. An existing segment of the Southwest Regional Trail is approximately 500 feet north of the AUAR study area, at the intersection of Creek Road/County Road 10 and Chaska Creek Boulevard.

According to the Natural Resources Conservation Service (NRCS), 24.1% of the study area is considered farmland of statewide importance (see Table 6).

ii. Planned land use as identified in comprehensive plans (if available) and any other applicable plan for land use, water, or resource management by a local, regional, state, or federal agency.

Chaska 2040 Comprehensive Plan

The *Chaska 2040 Comprehensive Plan*[3] acts as a framework and guiding tool for development for the next 20 years in Chaska. According to this plan, the study area is

[2] https://metrocouncil.org/Data-and-Maps/Research-and-Data/Metadata/Landuse-Planned-Research.aspx
[3] https://www.chaskamn.gov/605/2040-Comprehensive-Plan

designated mostly as Business Park, with some Rural Residential and Open Space uses (see Figure 8).

Table 5: Chaska 2040 Comprehensive Plan designations within the AUAR Study Area

Future Land Use Designation	Purpose
Business Park	Areas guided for the integration of office and light industrial uses in order to create employment centers on large sites that provide a greater diversity of jobs, higher development densities and jobs per acre, higher quality site and architectural design, and increased tax revenues. Office, office-showroom-warehousing, research and development services, high-tech electronic manufacturing, medical, and lodging are typical business uses appropriate for this land use category. Supporting retail and services, such as healthcare, fitness, child daycare, dry cleaning, bank, coffee shop, restaurant, and convenience store, should only be allowed as secondary uses, provided no more than 10 percent of the overall business park area is used for these purposes.
Rural Residential	Lots or parcels of five (5) acres or more guided for rural single-family detached dwellings at four dwelling units per 1/4 1/4 section (40 acres). This land use category is intended to ensure preservation of land identified as part of Chaska's Greenbelt. The objective of the Greenbelt is to physically separate Chaska from adjacent communities to preserve and strengthen Chaska's sense of community and identity. The buffer areas proposed in the development scenarios are consistent with this greenbelt concept and would create a natural open space separating the business park from other land uses.
Open Space Preservation	Land guided for open space preservation, including environmental protection, historic preservation, homeowners' association recreation (e.g. Jonathan), public/semi-public use or other public purposes, and for which development is prohibited through ownership, ordinances or other legal means.

Southwest Chaska Growth and Development Plan

The Southwest Chaska Growth and Development Plan[4], adopted in January 2013, provides the City with a guide for future land use decision-making, public infrastructure investments, and review of proposed development projects in the southwest growth area. This plan was developed with substantial public involvement from many stakeholders. The AUAR study area occupies the western portion of the area studied by this plan. The plan identifies the majority of the study area as Business Park use, with some areas of open space.

[4] https://chaskamn.gov/182/Southwest-Chaska-Plan

Carver County WMO 2020-2029 Watershed Management Plan

The Carver County Watershed Management Organization (WMO) 2020-2029 Watershed Management Plan is used to fulfill the County's water management responsibilities and provide a framework for water resource management. This plan identifies several water resource features within the AUAR study area. The plan identifies a Priority 1 Stream within the AUAR study area, which is a tributary of the Chaska Creek. Priority 1 waterbodies are considered current priority for implementation of projects.

Carver County Southwest Regional Trail Plan

The Carver County Southwest Regional Trail Plan shows a proposed trail segment from Engler Blvd to an existing segment along Creek Road. This segment of the trail was constructed in 2023.

iii. Zoning, including special districts or overlays such as shoreland, floodplain, wild and scenic rivers, critical area, agricultural preserves, etc.

AUAR Guidance: Water-related land use management districts should be delineated on appropriate maps, and the land use restrictions applicable in those districts should be described. If any variances or deviations from these restrictions within the AUAR area are envisioned, this should be discussed.

Existing Zoning

The parcels within the study area are mostly zoned as rural residential (RR), with several parcels in the northern portion of the study area zones as Planned Industrial Development (PID) as shown on Figure 7. According to Chaska's City Code, the RR zoning regulation permits uses of agriculture, forestry, single family dwellings, parks, and state-licensed residential facilities. Industrial districts permit manufacturing, warehousing, scientific research, offices, and adult oriented businesses.

FEMA National Flood Hazard

According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (panel number 27019C0217D, effective 12/21/2018), the majority of the AUAR study area is located in an area of minimal flood hazard. The northern portion of the study area contains a 100-year floodplain (Zone A) along the tributary of the Chaska Creek (Figure 10).

Other Special Districts and Zoning Overlays

The unnamed DNR Public Watercourse (M-055-020-001), a tributary of the Chaska Creek, is identified in the City of Chaska's Shoreland Management ordinance and therefore future development in this area will need to comply with the shoreland overlay district requirements. According to the City's zoning code, permitted uses within a Shoreland Overlay District include "all permitted uses allowed and regulated by the applicable zoning district underlying this shoreland overlay district as indicated on the

Official Zoning Map of the City."[5] Development standards applicable to the study area are described in Table 6.

Table 6: Standards Applicable to Shorelands of Tributary Watercourses

Unsewered Areas	
Lot Area (in square feet)	None
Water frontage and lot width at building line (in feet)	100
Structure setback from Ordinary High Water Mark (in feet)	100
Structure setback from roads and highways	50: Federal State, or county 30: Municipal or Private
Structure height limitation (in feet)	None
Maximum lot area covered by impervious surface (in %)	None
Sewage system setback from Ordinary High Water Mark (in feet)	75
Sewered Areas	
Lot Area (in square feet) Water front lots Other lots	None
Water frontage and lot width at building line (in feet)	75
Structure setback from Ordinary High Water Mark (in feet)	50

iv. If any critical facilities (i.e., facilities necessary for public health and safety, those storing hazardous materials, or those housing occupants who may be insufficiently mobile) are proposed in floodplain areas and other areas identified as at risk for localized flooding, describe the risk potential considering changing precipitation and event intensity.

No critical facilities are proposed in floodplain areas. No hazardous materials are proposed to be stored in floodplain areas.

b. Discuss the project's compatibility with nearby land uses, zoning, and plans listed in Item 9a above, concentrating on implications for environmental effects.

[5] https://chaska.municipalcodeonline.com/book?type=zoning#name=15.24_Shoreland_Management

AUAR Guidance: The extent of conversion of existing farmlands anticipated in the AUAR should be described. If any farmland will be preserved by special protection programs, this should be discussed.

If development of the AUAR will interfere or change the use of any existing designated parks, recreation areas, or trails, this should be described in the AUAR. The RGU may also want to discuss under this item any proposed parks, recreation areas, or trails to be developed in conjunction with development of the AUAR area.

The AUAR must include a statement of certification from the RGU that its comprehensive plan complies with the requirements set out at Minnesota Rules, part 4410.3610, subpart 1. The AUAR document should discuss the proposed AUAR area development in the context of the comprehensive plan. If this has not been done as part of the responses to Items 6, 9, 11, 18, and others, it must be addressed here; a brief synopsis should be presented here if the material has been presented in detail under other items. Necessary amendments to comprehensive plan elements to allow for the development scenario should be noted. If there are any management plans of any other local, state, or federal agencies applicable to the AUAR area, the document must discuss the compatibility of the plan with the development scenario studied, with emphasis on any incompatible elements.

The AUAR will discuss the project's compatibility with nearby land uses, zoning, parks and trails, and other relevant plans. The AUAR will also include a statement of certification from the RGU that its comprehensive plan complies with the requirements set out at Minnesota Rules, part 4410.3610, subpart 1.

c. Identify measures incorporated into the proposed project to mitigate any potential incompatibility as discussed in Item 9b above.

The AUAR will identify measures to mitigate any potential incompatibilities.

Figure 6: Existing Land Use

Figure 7: Existing Zoning

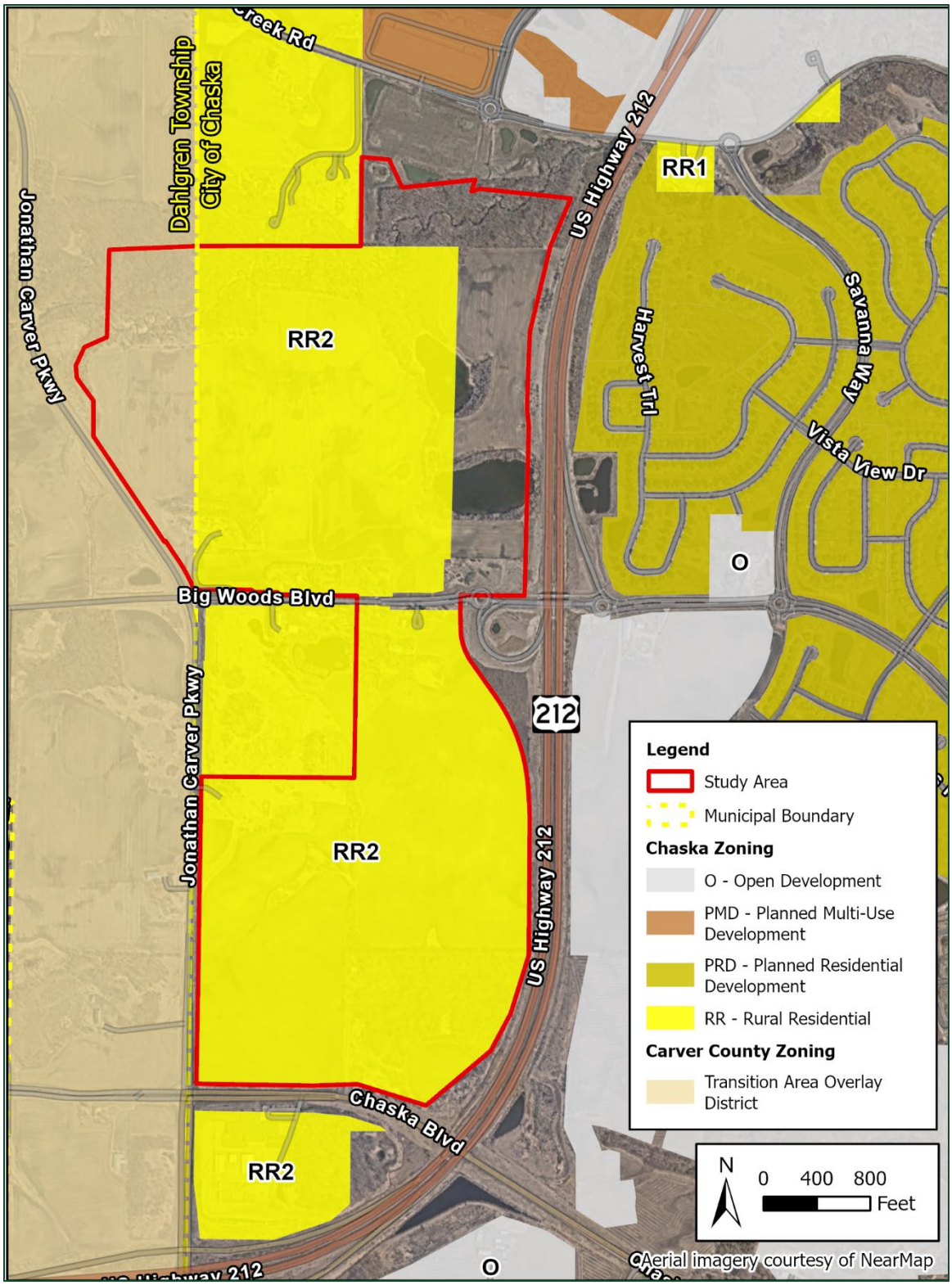
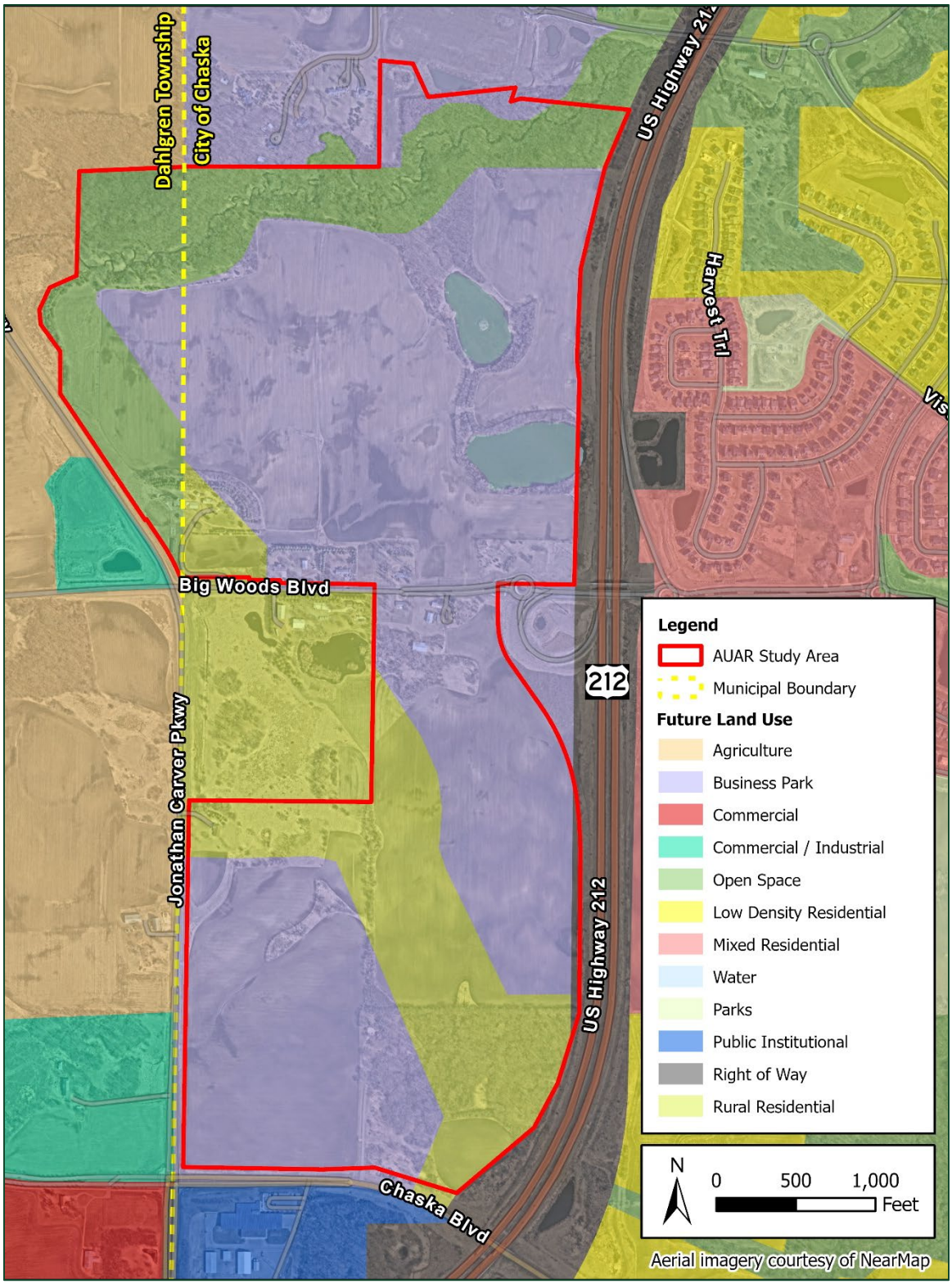


Figure 8: Future Land Use



11. GEOLOGY, SOILS, AND TOPOGRAPHY/LANDFORMS

a. Geology – Describe the geology underlying the project area and identify and map any susceptible geologic features such as sinkholes, shallow limestone formations, unconfined/shallow aquifers, or karst conditions. Discuss any limitations of these features for the project and any effects the project could have on these features. Identify any project designs or mitigation measures to address effects to geologic features.

AUAR Guidance: A map should be included to show any groundwater hazards identified.

According to the Geologic Atlas of Carver County (Minnesota Geological Survey, 2020), the AUAR study area is underlain by sand, gravel, and glacial till. The mean depth to bedrock is approximately 300-400 feet below ground surface. Bedrock is predominantly sandstone. In descending order, the upper formations are the Jordan Sandstone, and the St. Lawrence and Lone Rock formations.

There are no known sinkholes, shallow limestone formations, or unconfined/shallow aquifers located within the AUAR study area. There is no known karst conditions located within the study area or within 500 feet from the study area.

The AUAR will discuss any possible issues and mitigation measures associated with the proposed development scenarios and the geology of the study area.

b. Soils and Topography – Describe the soils on the site, giving NRCS (SCS) classifications and descriptions, including limitations of soils. Describe topography, any special site conditions relating to erosion potential, soil stability, or other soil limitations, such as steep slopes or highly permeable soils. Provide estimated volume and acreage of soil excavation and/or grading. Discuss impacts from project activities (distinguish between construction and operational activities) related to soils and topography. Identify measures during and after project construction to address soil limitations including stabilization, soil corrections, or other measures. Erosion/sedimentation control related to stormwater runoff should be addressed in response to Item 11.b.ii.

AUAR Guidance: The number of acres to be graded and number of cubic yards of soil to be moved need not be given; instead, a general discussion of the likely earthmoving needs for development of the area should be given, with an emphasis on unusual or problem areas. In discussing mitigation measures, both the standard requirements of the local ordinances and any special measures that would be added for AUAR purposes should be included. A standard soils map for the area should be included.

According to the Natural Resources Conservation Service (NRCS) Web Soil Survey, the area is comprised of 19 different soil types. Soil information is included in Table 6 and Figure 9. The erosion hazard rating included in Table 6 indicates the hazard of soil loss from off-road areas after the soil surface is exposed from disturbance activities. Within the study area,

approximately 33% of the soil surface is mapped with a "moderate" or "severe" erosion rating, indicating that some erosion is likely in these areas and that erosion control measures may be needed. The remaining 67% of the study area is mapped was not rated or was mapped with a "slight" rating, meaning that erosion is unlikely under ordinary climatic conditions.

The topography within the northern portion of the study area varies from 942 feet in elevation at the north center of the site to 894 feet in elevation along the stream that runs along the northern side. This site features various lowland areas as well as multiple bodies of water. All site drainage generally flows towards these bodies of water or lowland areas. The topography within the southern portion of the study area varies from 970 feet in elevation at the south center of the site to 914 feet at the northwest area. This site contains various lowland and wetland areas within its boundary. All site drainage generally flows towards these lowland or wetland areas.

The AUAR will include a general discussion of the likely earthmoving equipment for the development scenarios and will identify measures to minimize erosion and identify short-term and long-term best management practices.

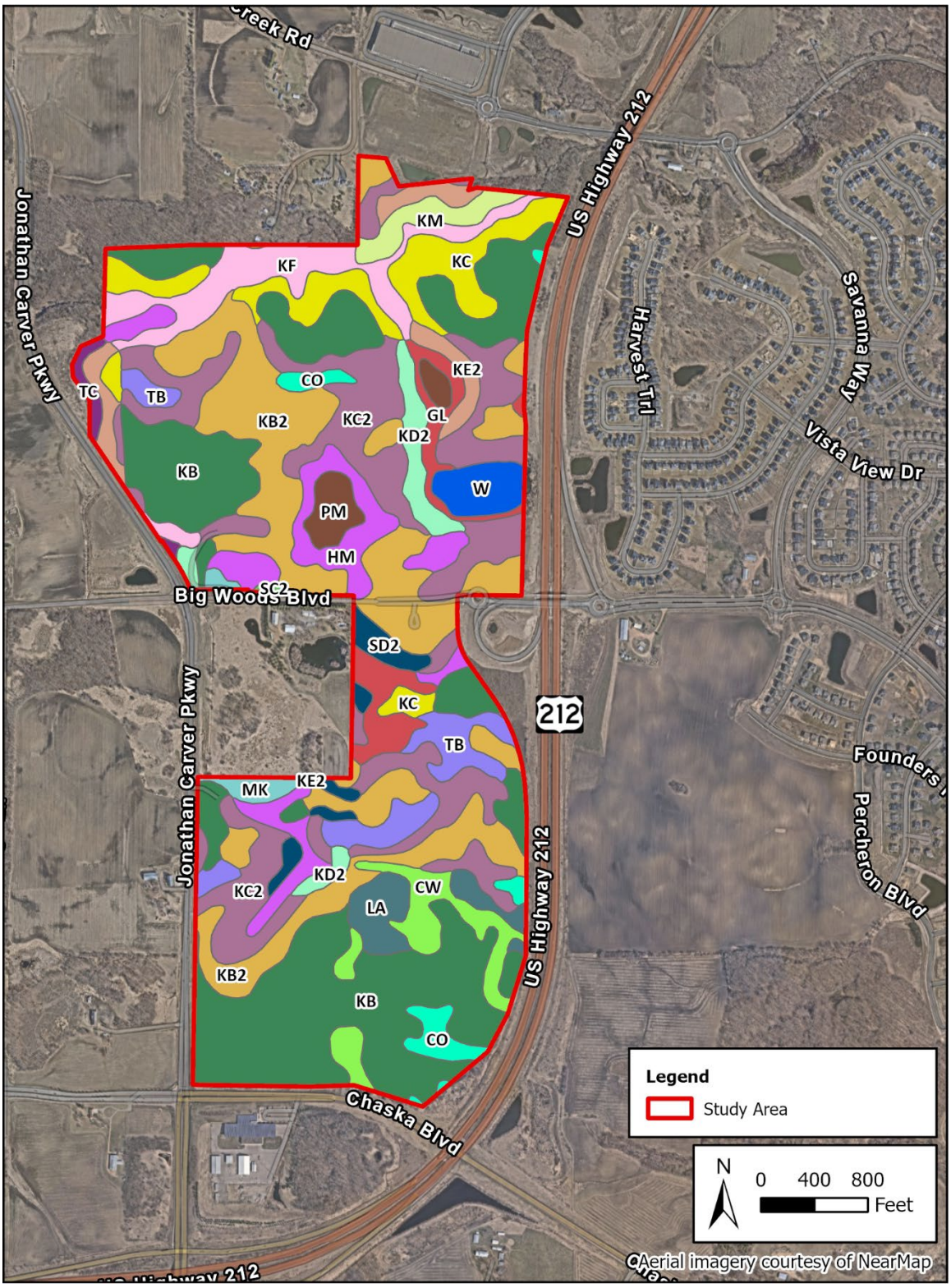
Any additional information provided by the developer will be utilized to supplement the information provided above.

Table 7: Soil Types

Map unit symbol	Map unit name	Acres in Study Area	Percent in Study Area	Farmland Rating	Erosion Hazard Rating
CO	Cordova clay loam, 0 to 2 percent slopes	5.9	1.6%	Prime farmland if drained	Slight
CW	Cordova-Webster complex	10.9	3.0%	Prime farmland if drained	Slight
GL	Glencoe clay loam, 0 to 1 percent slopes	10.4	2.9%	Prime farmland if drained	Slight
HM	Hamel loam, 0 to 2 percent slopes	19.5	5.4%	Prime farmland if drained	Slight
KB	Kilkenny-Lester loams, 2 to 6 percent slopes	91.6	25.5%	All areas are prime farmland	Slight
KB2	Lester-Kilkenny loams, 2 to 6 percent slopes, eroded	62.9	17.5%	All areas are prime farmland	Slight
KC	Lester-Kilkenny loams, 6 to 12 percent slopes	20.6	5.7%	Farmland of statewide importance	Moderate
KC2	Lester-Kilkenny complex, 6 to 10 percent slopes, moderately eroded	58.5	16.3%	Farmland of statewide importance	Moderate

Map unit symbol	Map unit name	Acres in Study Area	Percent in Study Area	Farmland Rating	Erosion Hazard Rating
KD2	Lester-Kilkenny complex, 10 to 16 percent slopes, moderately eroded	7.4	2.1%	Not prime farmland	Moderate
KE2	Lester-Kilkenny complex, 16 to 22 percent slopes	8.3	2.3%	Not prime farmland	Moderate
KF	Lester-Kilkenny complex, 22 to 40 percent slopes	17.3	4.8%	Not prime farmland	Severe
KM	Minneiska-Kalmarville complex, frequently flooded	5	1.4%	Not prime farmland	Slight
LA	Le Sueur-Lester complex, 1 to 6 percent slopes	7.3	2.0%	All areas are prime farmland	Slight
MK	Muskego and Houghton soils, 0 to 1 percent slopes	2.9	0.8%	Not prime farmland	Slight
PM	Klossner muck, 0 to 1 percent slopes	5.2	1.4%	Farmland of statewide importance	Slight
SC2	Lester-Storden complex, 6 to 10 percent slopes, moderately eroded	0.4	0.1%	Farmland of statewide importance	Moderate
SD2	Lester-Storden complex, 10 to 16 percent slopes, moderately eroded	5.5	1.5%	Not prime farmland	Moderate
TB	Terril loam, 2 to 6 percent slopes	12.5	3.5%	All areas are prime farmland	Slight
TC	Terril loam, 6 to 12 percent slopes	1.8	0.5%	Farmland of statewide importance	Moderate
W	Water	5.4	1.5%	Not prime farmland	Not rated

Figure 9: Soil Types



12. WATER RESOURCES

AUAR Guidance: The information called for on the EAW form should be supplied for any of the infrastructure associated with the AUAR development scenario, and for any development expected to physically impact any water resources. Where it is uncertain whether water resources will be impacted depending on the exact design of future development, the AUAR should cover the possible impacts through a "worst case scenario" or else prevent impacts through the provisions of the mitigation plan.

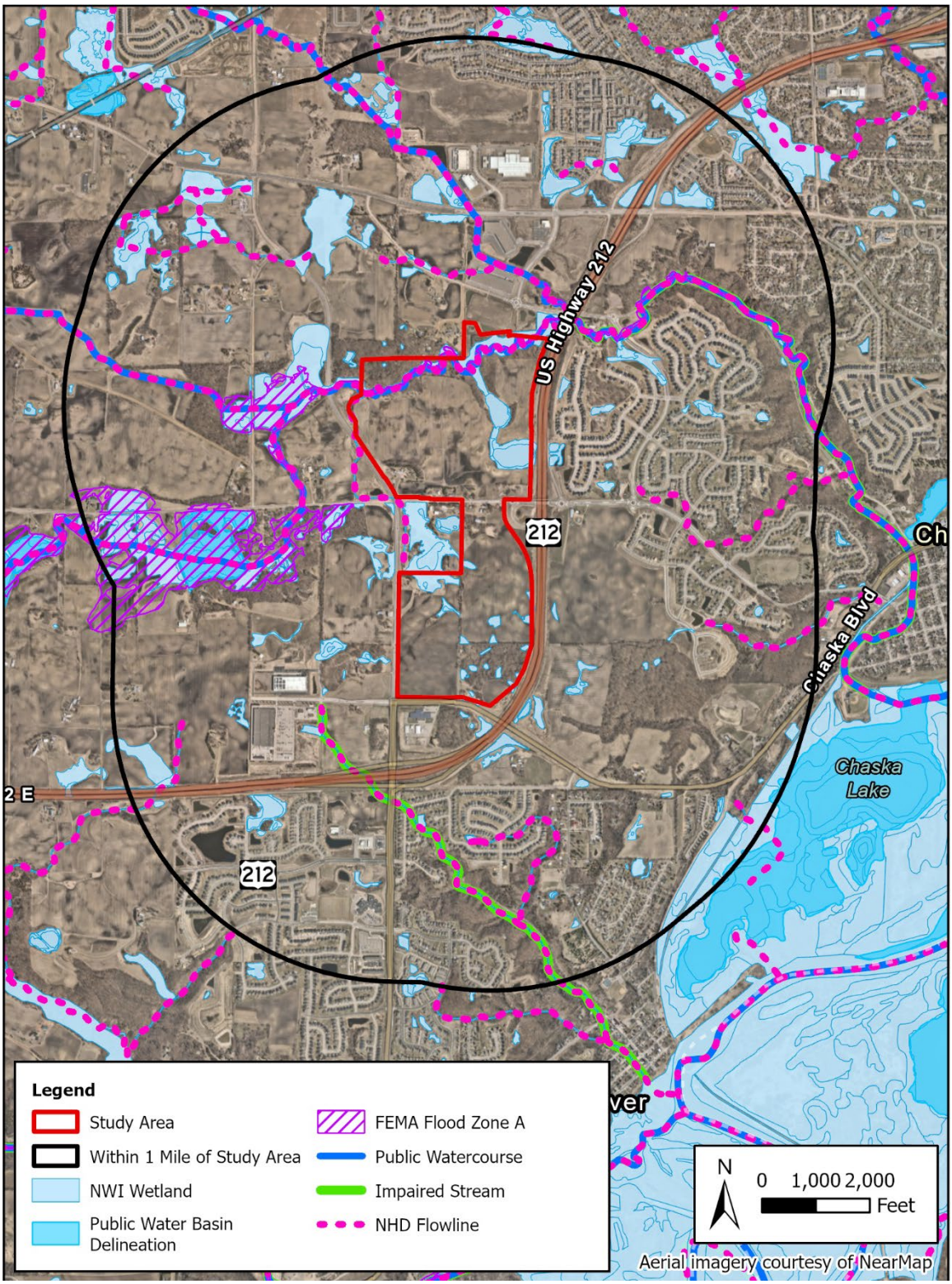
a. Describe surface water and groundwater features on or near the site below.

i. Surface Water – lakes, streams, wetlands, intermittent channels, and county/judicial ditches. Include any special designations such as public waters, trout stream/lake, wildlife lakes, migratory waterfowl feeding/resting lake, and outstanding resource value water. Include water quality impairments or special designations listed on the current MPCA 303d Impaired Waters List that are within one mile of the project. Include DNR Public Waters Inventory number(s), if any.

A level 2 field wetland delineation was completed for a portion of the study area. A quality assessment will be completed to determine wetland buffer areas. There are numerous NWI wetlands located throughout the AUAR study area, as shown in Figure 10. Surface water constraints and implications will be addressed in the AUAR, along with findings from the 2025 field delineation (which will include the remaining portion of the study area).

One surface water resource was identified within the AUAR study area. An unnamed DNR Public Watercourse (M-055-020-001), a tributary of the Chaska Creek, flows east through the northern portion of the study area. There is an MPCA Section 303(d) Impaired Stream within one mile of the AUAR study area. This stream is impaired due to fecal coliform and TMDL study for this waterbody has been approved by the US Environmental Protection Agency (EPA). There are several other streams and flowlines identified within one mile of the study area; most of these features are connected to the stream that flows through the study area. There are no trout streams within one mile of the AUAR study area. Any additional water resources or surface water constraints identified during the wetland delineation will be discussed in the AUAR.

Figure 10: Surface Water Resources



ii. Groundwater – aquifers, springs, and seeps. Include 1) depth to groundwater; 2) if project is within a MDH well protection area; and 3) identification of any onsite and/or nearby wells, including unique numbers and well logs, if available. If there are no wells known on site or nearby, explain the methodology used to determine this.

According to the Minnesota Spring Inventory there are no known springs or seeps within the study area.

The Minnesota Hydrogeology Atlas (Minnesota DNR, 2016) indicates that groundwater is likely present between 10-20 feet below grade, excluding the wetland areas.

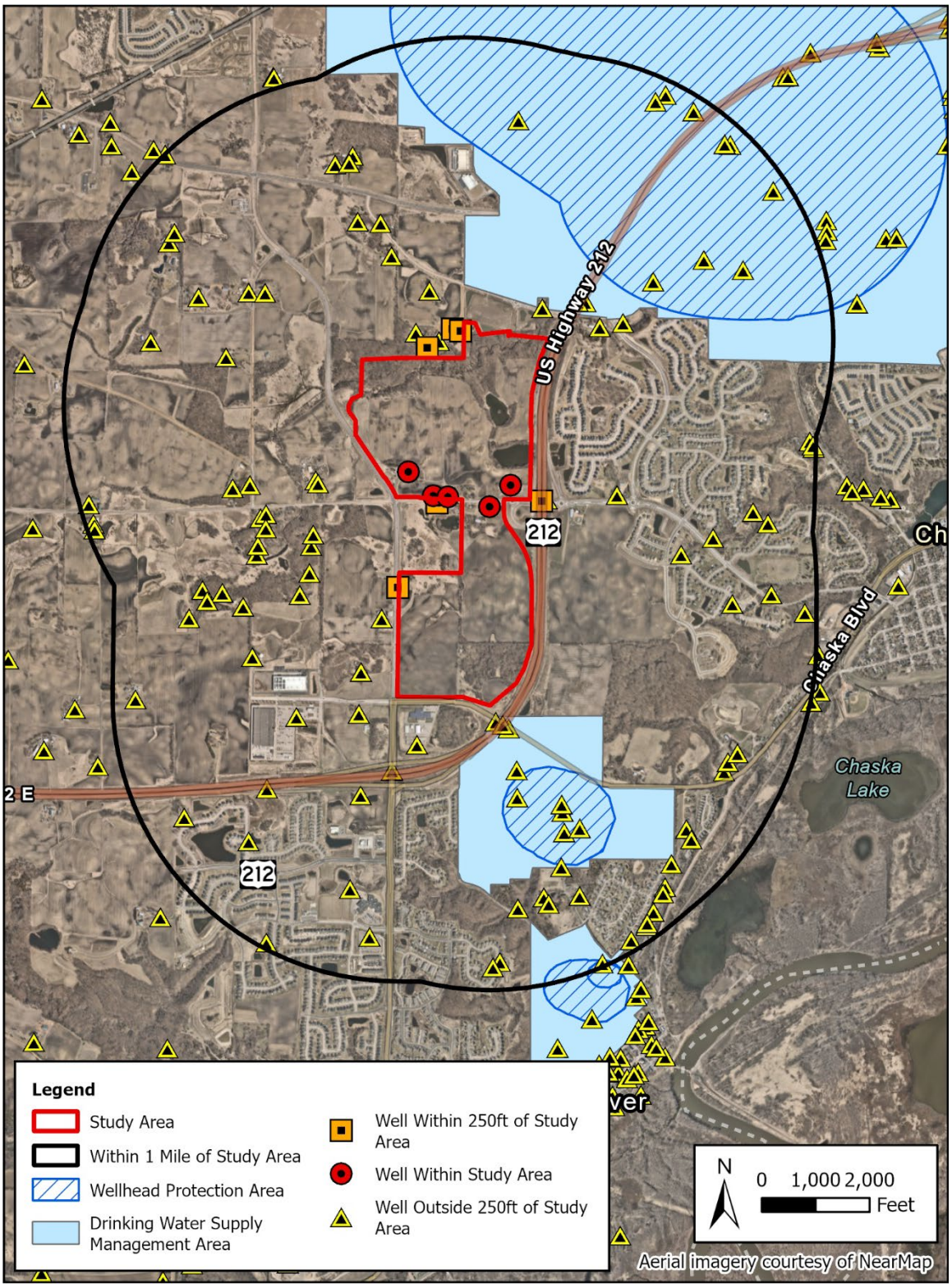
Based on the Minnesota Department of Health Minnesota Well Index (MWI), there are 5 wells located within the AUAR study area and five wells within 250 feet of the AUAR study area (see Table 7 and Figure 11). Wells located within the study area would be properly sealed by a licensed well contractor prior to development within the study area per MPCA and MDH well sealing requirements. Additional analysis on the surrounding wells near the study area will be provided in the AUAR.

The study area is not located within a wellhead protection area or Drinking Water Supply Management Area (DWSMA).

Table 8: MWI Wells within the AUAR Study Area

Well ID Number	Index Status	Well Use	Well Depth (feet)
221492	Active	Domestic	215
424015	Active	Domestic	211
481235	Active	Domestic	218
546818	Active	Domestic	227
142819	Sealed	Domestic	300

Figure 11: Groundwater Resources



b. Describe effects from project activities on water resources and measures to minimize or mitigate the effects below.

i. Wastewater – For each of the following, describe the sources, quantities, and composition of all sanitary, municipal/domestic, and industrial wastewaters projected or treated at the site.

AUAR Guidance: Observe the following points of guidance in an AUAR:

- *Only domestic wastewater should be considered in an AUAR—industrial wastewater would be coming from industrial uses that are excluded from review through an AUAR process*
- *Wastewater flows should be estimated by land use subareas of the AUAR area; the basis of flow estimates should be explained*
- *The major sewer system features should be shown on a map and the expected flows should be identified*
- *If not explained under Item 6, the expected staging of the sewer system construction should be described*
- *The relationship of the sewer system extension to the RGU's comprehensive sewer plan and (for metro area AUARs) to Metropolitan Council regional systems plans, including MUSA expansions, should be discussed. For non-metro area AUARs, the AUAR must discuss the capacity of the RGU's wastewater treatment system compared to the flows from the AUAR area; any necessary improvements should be described.*
- *If on-site systems will serve part of the AUAR, the guidance in the February 2000 edition of the EAW Guidelines on page 16 regarding item 18b under Residential development should be followed.*

1) If the wastewater discharge is to a publicly owned treatment facility, identify any pretreatment measures and the ability of the facility to handle the added water and waste loadings, including any effects on, or required expansion of, municipal wastewater infrastructure.

Wastewater from the proposed development scenarios will be discharged into the City of Chaska collection system. This will require extending the existing infrastructure from Creek Boulevard to the study area. The extension will need to cross an unnamed creek to provide service. A lift station will need to be constructed to complete this extension. The AUAR will identify maximum flows and characterize the wastewater concentrations, determine any pretreatment measures, if applicable, and address any anticipated infrastructure needs for the scenario.

2) If the wastewater discharge is to a subsurface sewage treatment system (SSTS), describe the system used, the design flow, and suitability of site conditions for such a system.

No subsurface sewage treatment systems (SSTS) are anticipated within the AUAR study area for the proposed development scenario.

3) If the wastewater discharge is to surface water, identify the wastewater treatment methods, discharge points, and proposed effluent limitations to mitigation impacts. Discuss any effects to surface or groundwater from wastewater discharges.

No wastewater discharge to surface waters is anticipated for the proposed development scenario.

ii. Stormwater – Describe changes in surface hydrology resulting from change of land cover. Describe the routes and receiving water bodies for runoff from the project site (major downstream water bodies as well as the immediate receiving waters). Discuss environmental effects from stormwater discharges on receiving waters post-construction, including how the project will affect runoff volume, discharge rate, and change in pollutants. Consider the effects of current Minnesota climate trends and anticipated changes in rainfall frequency, intensity, and amount with this discussion. For projects requiring NPDES/SDS Construction Stormwater permit coverage, state the total number of acres that will be disturbed by the project and describe the stormwater pollution prevention plan (SWPPP), including specific best management practices to address soil erosion and sedimentation during and after project construction. Discuss permanent stormwater management plans, including methods of achieving volume reduction to restore or maintain the natural hydrology of the site using green infrastructure practices or other stormwater management practices. Identify any receiving waters that have construction-related water impairments or are classified as special as defined in the Construction Stormwater permit. Describe additional requirements for special and/or impaired waters.

AUAR Guidance: For an AUAR the following additional guidance should be followed in addition to that in EAW Guidelines:

- *It is expected that an AUAR will have a detailed analysis of stormwater issues*
- *A map of the proposed stormwater management system and of the water bodies that will receive stormwater should be provided*
- *The description of the stormwater systems would identify on-site and "regional" detention ponding and also indicate whether the various ponds will be new water bodies or converted existing ponds or wetlands. Where on-site ponds will be used but have not yet been designed, the discussion should indicate the design standards that will be followed.*

- *If present in or adjoining the AUAR area, the following types of water bodies must be given special analyses:*
    - *Lakes: Within the Twin Cities metro area, a nutrient budget analysis must be prepared for any "priority lake" identified by the Metropolitan Council. Outside of the metro area, lakes needing a nutrient budget analysis must be determined by consultation with the MPCA and DNR staffs.*
    - *Trout streams: If stormwater discharges will enter or affect a trout stream, an evaluation of the impacts on the chemical composition and temperature regime of the stream and the consequent impacts on the trout population (and other species of concern) must be included.*

There is currently minimal impervious surface area and no existing permanent stormwater management features within the study area. The total amount of impervious surface under the development scenarios will be documented in the AUAR.

The AUAR will address stormwater rates, water quality, and volumes for the AUAR study area, and temporary and permanent stormwater best management practices. An existing and proposed conditions analysis will be completed showing the locations of the temporary and permanent stormwater best management practices.

The National Pollution Discharge Elimination System (NPDES) permit, City of Chaska Municipal Separate Storm Sewer System (MS4), and regulatory requirements will be adhered to.

Based on the results of the climate trends analysis and flooding risk assessment, additional volume and rate control needed for stormwater management will be discussed in the AUAR. Stormwater management strategies including any proposed green infrastructure will be documented in the AUAR.

iii. Water Appropriation – Describe if the project proposes to appropriate surface or groundwater (including dewatering). Describe the source, quantity, duration, use, and purpose of the water use and if a DNR water appropriation permit is required. Describe any well abandonment. If connecting to an existing municipal water supply, identify the wells to be used as a water source and any effects on, or required expansion of, municipal water infrastructure. Discuss environmental effects from water appropriation, including an assessment of the water resources available for appropriation. Discuss how the proposed water use is resilient in the event of changes in total precipitation, large precipitation events, drought, increased temperatures, variable surface water flows and elevations, and longer growing seasons. Identify any measures to avoid, minimize, or mitigate environmental effects from the water appropriation. Describe contingency plans should the appropriation volume increase beyond infrastructure capacity or water supply for the project diminish in quantity or

quality, such as reuse of water, connections with another water source, or emergency connections.

AUAR Guidance: If the area requires new water supply wells, specific information about that appropriation and its potential impacts on groundwater levels should be given; if groundwater levels would be affected, any impacts resulting on other resources should be addressed.

Water supply to the proposed development scenarios will be provided by the City of Chaska water distribution system. This will require extending the existing infrastructure from Creek Boulevard to the study area. The extension will need to cross an unnamed creek to provide service. Additionally, a water tower or other infrastructure improvements may be necessary to ensure adequate flow and pressure for the development. The AUAR will evaluate the existing and proposed infrastructure needs.

Handling of any required construction dewatering discharge will be addressed in the AUAR. The AUAR will also discuss the water demands for the site and the existing water system capacity. Mitigation strategies or system improvements, if applicable, will be identified in the AUAR.

iv. Surface Waters

1) **Wetlands – Describe any anticipated physical effects or alterations to wetland features, such as draining, filling, permanent inundation, dredging, and vegetative removal. Discuss direct and indirect environmental effects from physical modification of wetlands, including the anticipated effects that any proposed wetland alterations may have to the host watershed, taking into consideration how current Minnesota climate trends and anticipated climate change in the general location of the project may influence the effects. Identify measures to avoid (e.g., available alternatives that were considered), minimize, or mitigate environmental effects to wetlands. Discuss whether any required compensatory wetland mitigation for unavoidable wetland impacts will occur in the same minor or major watershed and identify those probable locations.**

   A level 2 field wetland delineation was completed for a portion of the study area. A quality assessment was completed to determine wetland buffer areas. The remaining portion of the study area will be delineated, and results of this level 2 field wetland delineation will be included in the AUAR. Surface water alterations, including wetland impacts and mitigation strategies, will be discussed in the AUAR.

2) **Other surface waters – Describe any anticipated physical effects or alterations to surface water features (lakes, streams, ponds, intermittent channels, county/judicial ditches) such as draining, filling, permanent inundation, dredging, diking, stream diversion, impoundment, aquatic plant removal, and riparian alteration. Discuss direct and indirect environmental effects from physical modification of water features, taking into consideration how current Minnesota climate trends and anticipated climate change in the general location of the project may influence the effects. Identify measures to avoid, minimize, or**

mitigate environmental effects to surface water features, including in-water Best Management Practices that are proposed to avoid or minimize turbidity/sedimentation while physically altering the water features. Discuss how the project will change the number or type of watercraft on any water body, including current and projected watercraft usage.

AUAR Guidance: Water surface use need only be addressed if the AUAR area would include or adjoin recreational water bodies.

Other surface water features such as streams are present within the AUAR study area. Surface water alterations will be discussed in the AUAR.

13. CONTAMINATION/HAZARDOUS MATERIALS/WASTES

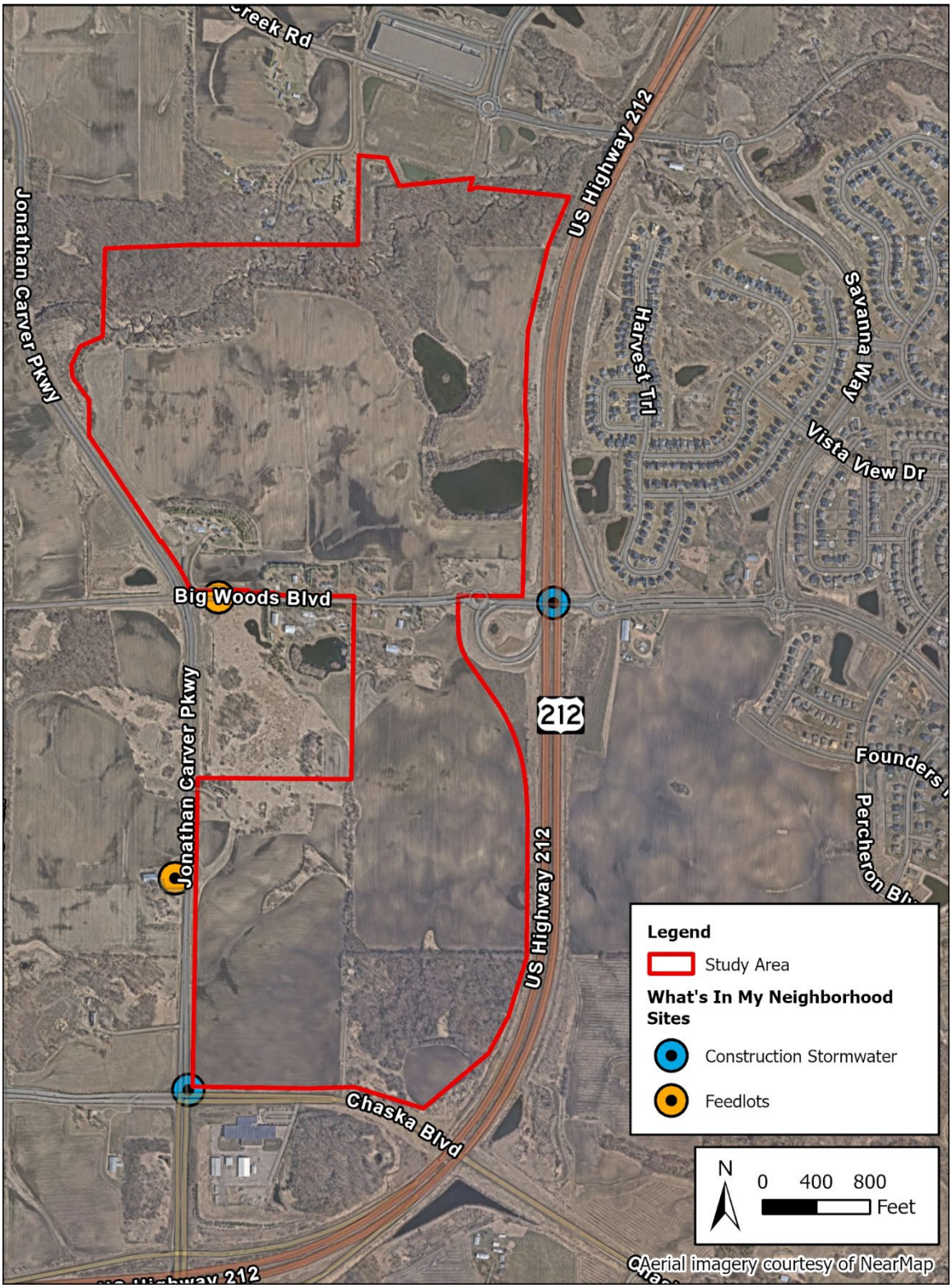
a. Pre-project Site Conditions – Describe existing contamination or potential environmental hazards on or in close proximity to the project site, such as soil or groundwater contamination, abandoned dumps, closed landfills, existing or abandoned storage tanks, and hazardous liquid or gas pipelines. Discuss any potential environmental effects from pre-project site conditions that would be caused or exacerbated by project construction and operation. Identify measures to avoid, minimize, or mitigate adverse effects from existing contamination or potential environmental hazards. Include development of a Contingency Plan or Response Action Plan.

The Minnesota Pollution Control Agency's (MPCA) What's In My Neighborhood database inventory was reviewed to determine if any known contaminated properties or potential environmental hazards are located within and adjacent to the AUAR study area. This review identified four properties near the study area, listed below in Table 8 and shown on Figure 12. These properties are considered low risk for contamination concerns.

Table 9: MPCA What's in my Neighborhood Sites

Site ID	Name	Status	Activity	Risk
228821	TH 212 Interchange and CSAH 44 Improvements	Active	Construction Stormwater	Low
64266	Joe Wickenhauser Farm	Active	Feedlots	Low
95728	Tim Raser Farm	Active	Feedlots	Low
129263	Freeway Commercial District Improvements	Active	Construction Stormwater	Low

Figure 12: MPCA What's in my Neighborhood Sites



b. Project Related Generation/Storage of Solid Wastes – Describe solid wastes generated/stored during construction and/or operation of the project. Indicate method of disposal. Discuss potential environmental effects from solid waste handling, storage, and disposal. Identify measures to avoid, minimize, or mitigate adverse effects from the generation/storage of solid waste including source reduction and recycling.

AUAR Guidance: Generally, only the estimated total quantity of municipal solid waste generated and information about any recycling or source separation programs of the RGU need to be included.

The AUAR will provide information on the estimated quantity of municipal solid waste to be generated during construction and operational phases of the development scenarios.

c. Project Related Use/Storage of Hazardous Materials – Describe chemicals/hazardous materials used/stored during construction and/or operation of the project including method of storage. Indicate the number, location, and size of any above or below ground tanks to store petroleum or other materials. Discuss potential environmental effects from accidental spills or releases of hazardous materials. Identify measures to avoid, minimize, or mitigate adverse effects from the use/storage of chemicals/hazardous materials including source reduction and recycling. Include development of a spill prevention plan.

AUAR Guidance: Not required for an AUAR. Potential locations of storage tanks associated with commercial uses in the AUAR should be identified (e.g., gasoline tanks at service stations).

Any demolition activities must comply with state and federal regulations that require inspection of the structure for hazardous materials such as asbestos, lead based paint, light ballasts, thermostats, stored chemicals, and ozone depleting chemicals. The AUAR will identify any potential future storage tank locations anticipated as part of the proposed development scenarios and if any existing storage tanks are anticipated to be used under the development scenarios.

d. Project Related Generation/Storage of Hazardous Wastes – Describe hazardous wastes generated/stored during construction and/or operation of the project. Indicate method of disposal. Discuss potential environmental effects from hazardous waste handling, storage, and disposal. Identify measures to avoid, minimize, or mitigate adverse effects from the generation/storage of hazardous wastes including source reduction and recycling.

AUAR Guidance: Not required for an AUAR.

Not applicable.

14. FISH, WILDLIFE, PLANT COMMUNITIES, AND SENSITIVE ECOLOGICAL RESOURCES (RARE FEATURES)

a. Describe fish and wildlife resources as well as habitats and vegetation on or near the site.

AUAR Guidance: The description of fish and wildlife resources should be related to the habitat types depicted on the cover types map. Any differences in impacts between development scenario should be highlighted in the discussion.

The majority of the land within the AUAR study area has been previously disturbed through farming and provides limited and low-quality habitat. There is one Regionally Significant Ecological Area (RSEA) located within the site. This RSEA is found along the tributary of the Chaska Creek that flows through the northern portion of the site. There is one Native Plant Community (NPC), two Sites of Biodiversity Significance (SBS), and one RSEA within one mile of the study area. Most of the study area is agricultural land, with some areas of forest, grassland, and wetland. Forest, grassland, and wetlands may provide habitat for wildlife. Wildlife that can be found within the study area include birds, mammals, and insects. There are several residences located in the center portion of the study area.

The AUAR will address the cover types for the existing conditions and the post-construction scenarios.

b. Describe rare features such as state-listed (endangered, threatened, or special concern) species, native plant communities, Minnesota County Biological Survey Sites of Biodiversity Significance, and other sensitive ecological resources on or within close proximity to the site. Provide the license agreement number and/or correspondence number (ERDB) from which the data were obtained and attach the Natural Heritage letter from the DNR. Indicate if any additional habitat or species survey work has been conducted within the site and describe results.

AUAR Guidance: For an AUAR, prior consultation with the DNR Division of Ecological Resources for information about reports of rare plant and animal species in the vicinity is required. Include the reference numbers called for on the EAW form in the AUAR and include the DNR's response letter. If such consultation indicates the need, an on-site habitat survey for rare species in the appropriate portions of the AUAR area is required. Areas of on-site surveys should be depicted on a map, as should any "protection zones" established as a result.

State-Listed Species

Kimley-Horn reviewed the Natural Heritage Information System (NHIS) data per license agreement LA-2024-006 for state listed species within one mile of the project study area. The database includes known occurrences of any state endangered, threatened, or special concern listed species. One species record, sessile-flowered yellow cress, was identified within one mile of the study area. The identification of this species is consistent with the Natural Heritage Review received from the MnDNR. Any potential impacts to wildlife habitat, federally listed species, and state-listed species will be provided in the AUAR.

Federally-Listed Species

The U.S. Fish and Wildlife (USFWS) Service Information for Planning and Conservation (IPaC) tool was used to identify federally-listed species that may be present in the study area. This review

identified two federally-listed threatened species, the northern long-eared bat (*Myotis septentrionalis*) and rusty-patched bumble bee (*Bombus affinis*). This review also identified the proposed threatened monarch butterfly (*Danus Plexippus*) and proposed endangered tricolored bat (*Perimyotis subflavus*). This review identified one experimental species, the whooping crane (*Grus americana*).

Northern Long-Eared Bat

The northern long-eared bat (NLEB) was identified by the IPaC species list. The NLEB was designated a federally endangered species by USFWS in April 2023. According to the Minnesota DNR, in the southern part of the state, NLEB may use attics, bridges, and buildings for hibernating. In summer, the species is often found within forested habitats, especially around wetlands. Summer roosts may include under loose tree bark, in buildings, behind signs or shutters, caves, mines, and quarry tunnels. Given that a portion of the study area is forested, there is potential for the northern long-eared bat to utilize the site. The project may include the removal of trees. Potential impacts to the NLEB and mitigation measures will be discussed in the AUAR.

Tricolored Bat

The tricolored bat was proposed to be designated as a federally endangered species by USFWS in September 2022. According to the USFWS, during the winter, tricolored bats are often found in caves and abandoned mines. During the spring, summer, and fall, tricolored bats are found in forested habitats where they roost in trees, primarily among leaves of live or recently dead deciduous hardwood trees, but may also be found in Spanish moss, pine trees, and occasionally human structures. Like the NLEB, the spread of white-nose syndrome across the eastern portion of the United States has become the major threat to the Tricolored Bat, with an estimated decline of more than 90% in affected colonies. According to the DNR's Rare Species Guide, there are no known maternity colonies within the state of Minnesota. Only three live hibernating individuals have been observed in Minnesota. Given that a portion of the study area is forested, there is potential for the tricolored bat to utilize the site. The project may include the removal of trees. Potential impacts to the tricolored bat and mitigation measures will be discussed in the AUAR.

Whooping Crane

The Whooping Crane is designated as an experimental population, non-essential species by the USFWS. Non-essential experimental populations are treated as threatened species on National Wildlife Refuge and National Park land (require consultation under 7(a)(2) of the ESA) and as a proposed species on private land (no section 7(a)(2) requirements, but Federal agencies must not jeopardize their existence (section 7(a)(4))). The preferred habitat for the species includes

shallow mashes and adjacent, open grasslands. Due to the non-essential status of the species, no adverse impacts are anticipated.

Rusty Patched Bumble Bee

The rusty patched bumble bee is listed as a federally threatened species by USFWS. From April through October this species uses underground nests in upland grasslands, shrublands, and forest edges, and forages where nectar and pollen are available. From October through April the species overwinters under tree litter in upland forests and woodlands. The rusty patched bumble bee may be impacted by a variety of land management activities including, but not limited to, prescribed fire, tree-removal, haying, grazing, herbicide use, pesticide use, land-clearing, soil disturbance or compaction, or use of non-native bees. The AUAR study area was identified within the High Potential Zone for the Rusty Patched Bumble Bee.

Monarch Butterfly

The monarch butterfly was identified by the IPaC species list and is classified as a proposed threatened species by the USFWS. The preferred habitat for this species is prairie where milkweed and flowers are present. According to the USFWS, there are many potential reasons for the butterfly's decline, including habitat loss at breeding and overwintering sites, disease, pesticides, logging at overwintering sites, and climate change. The project may include disturbance to grassland ecosystems. Potential impacts to the monarch butterfly and mitigation measures will be discussed in the AUAR.

Ecologically Significant Areas

A calcareous fen has been documented in the vicinity of the proposed project. A calcareous fen is a rare and distinctive peat-accumulating wetland that is legally protected in Minnesota. Many of the unique characteristics of calcareous fens result from the upwelling of groundwater through calcareous substrates.

c. Discuss how the identified fish, wildlife, plant communities, rare features, and ecosystems may be affected by the project. Include a discussion on introduction and spread of invasive species from the project construction and operation. Separately discuss effects to known threatened and endangered species.

Invasive Species

Invasive species are a major cause of biodiversity loss and are considered biological pollutants by the DNR. Invasive species can be moved on construction equipment, landscaping equipment, and other debris. The AUAR will include a discussion on best management practices to prevent the introduction and spread of invasive species during construction and operation.

Stormwater

Stormwater run-off can cause a number of environmental problems. When stormwater drains off a construction site, it can carry sediment and pollutants that harm lakes, rivers, streams, and wetlands which in turn may harm wildlife. Strategies for stormwater management and

treatment of stormwater run-off within the study area will be discussed in Section 12 of the AUAR.

Impacts to Protected Species and Habitats

The AUAR will further investigate the potential for impacts to any federally listed species, state-listed species, or protected wildlife habitats.

d. Identify measures that will be taken to avoid, minimize, or mitigate adverse effects to fish, wildlife, plant communities, and sensitive ecological resources.

The AUAR will address any mitigation measures identified by the MnDNR and USFWS to minimize and avoid potential adverse impacts to any protected species and wildlife habitats from the proposed development scenarios.

15. HISTORIC PROPERTIES

Describe any historic structures, archeological sites, and/or traditional cultural properties on or in close proximity to the site. Include 1) historic designations; 2) known artifact areas; and 3) architectural features. Attach letter received from the Minnesota State Historic Preservation Office (SHPO). Discuss any anticipated effects to historic properties during project construction and operation. Identify measures that will be taken to avoid, minimize, or mitigate adverse effects to historic properties.

AUAR Guidance: For an AUAR, contact with the State Historic Preservation Office and State Archeologist is required to determine whether there are areas of potential impacts to these resources. If any exist, an appropriate site survey of high probability areas is needed to address the issue in more detail. The mitigation plan must include mitigation for any impacts identified.

According to the Minnesota Office of the State Archaeologist (OSA) Public Viewer, within the study area's PLSS sections, four archaeological sites are present. According to the Minnesota Statewide Historic Inventory Portal, five historical sites were identified within the AUAR study area (see Table 11). The Ortlip Farmstead, previously listed as eligible, was demolished in 2005.

Table 10: Historic Properties

Address	Property Name	National Register Listing Status	Location
4780 Big Woods Blvd	Farmstead	Not listed	Within AUAR Study Area
4650 Big Woods Blvd	Farmstead	Not listed	Within AUAR Study Area
4570 Big Woods Blvd	House	Not listed	Within AUAR Study Area
4575 County Rd 44	House	Not listed	Within AUAR Study Area
North of Chaska Blvd	Ortlip Farmstead	Eligible (demolished)	Within AUAR Study Area

The AUAR will discuss the results of this database review, and any potential impacts to archaeological, historical, and/or architectural resources as well as any applicable mitigation strategies.

16. VISUAL

Describe any scenic views or vistas on or near the project site. Describe any project related visual effects such as vapor plumes or glare from intense lights. Discuss the potential visual effects from the project. Identify any measures to avoid, minimize, or mitigate visual effects.

AUAR Guidance: Any impacts on scenic views and vistas present in the AUAR should be addressed. This would include both direct physical impacts and impacts on visual quality or integrity. EAW Guidelines contains a list of possible scenic resources.

If any non-routine visual impacts would occur from the anticipated development, this should be discussed here along with appropriate mitigation.

There are no scenic views or vistas in or near the AUAR study area. The AUAR will discuss any potential visual impacts of the proposed development scenarios on the surrounding area and any applicable mitigation strategies.

17. AIR

a. **Stationary Source Emissions – Describe the type, sources, quantities, and compositions of any emissions from stationary sources such as boilers or exhaust stacks. Include any hazardous air pollutants, criteria pollutants, and any greenhouse gases. Discuss effects to air quality including any sensitive receptors, human health, or applicable regulatory criteria. Include a discussion of any methods used to assess the project's effect on air quality and the results of that assessment. Identify pollution control equipment and other measures that will be taken to avoid, minimize, or mitigate adverse effects from stationary source emissions.**

   AUAR Guidance: This item is not applicable to an AUAR. Any stationary air emissions source large enough to merit environmental review requires individual review.

   Not applicable to an AUAR.

b. **Vehicle Emissions – Describe the effect of the project's traffic generation on air emissions. Discuss the project's vehicle-related emissions effect on air quality. Identify measures (e.g., traffic operational improvements, diesel idling minimization plan) that will be taken to minimize or mitigate vehicle-related emissions.**

   AUAR Guidance: Although the MPCA no longer issues Indirect Source Permits, traffic-related air quality may still be an issue if the analysis in Item 18 indicates that development would cause or worsen traffic congestion. The general guidance from the EAW form should still be followed. Questions about the details of air quality analysis should be directed to MPCA staff.

The Minnesota Department of Transportation (MnDOT) has developed a screening method designed to identify intersections that will not cause a carbon monoxide (CO) impact above state standards. MnDOT has demonstrated that even the 10 highest traffic volume intersections in the Twin Cities do not experience CO impacts[6]. Therefore, intersections with traffic volumes lower than these 10 highest intersections will not cause a CO impact above state standards. MnDOT's screening method demonstrates that intersections with total daily approaching traffic volumes below 82,300 vehicles per day will not have the potential for causing CO air pollution problems. The AUAR will include an analysis of future traffic volumes for the intersections in the study area and will determine if any future conditions exceed the criteria that would lead to a violation of the air quality standards.

c. Dust and Odors – Describe sources, characteristics, duration, quantities, and intensity of dust and odors generated during project construction and operation. (Fugitive dust may be discussed under Item 16a). Discuss the effect of dust and odors in the vicinity of the project including nearby sensitive receptors and quality of life. Identify measures that will be taken to minimize or mitigate the effects of dust and odors.

AUAR Guidance: Dust and odors need not be addressed in an AUAR, unless there is some unusual reason to do so. The RGU might want to discuss as part of the mitigation plan, however, any dust control ordinances in effect.

The AUAR will include discussion of dust control ordinances, this would include best management practices that would be applicable during demolition and construction within the AUAR study area.

18. GREENHOUSE GAS (GHG) EMISSIONS/CARBON FOOTPRINT

a. GHG Quantification – For all proposed projects, provide quantification and discussion of project GHG emissions. Include additional rows in the tables as necessary to provide project-specific emission sources. Describe the methods used to quantify emissions. If calculation methods are not readily available to quantify GHG emissions for a source, describe the process used to come to that conclusion and any GHG emission sources not included in the total calculation.

About Greenhouse Gases (GHGs)

Certain gases in the earth's atmosphere, classified as greenhouse gases (GHGs), play a critical role in determining the earth's surface temperature. Solar radiation enters the earth's atmosphere from space. A portion of the radiation is absorbed by the earth's surface and a smaller portion of this radiation is reflected back toward space. This absorbed radiation is then emitted from the earth as low-frequency infrared radiation. The frequencies at which bodies

[6] Source: MnDOT CO Hot Spot Screening Method. https://www.dot.state.mn.us/project-development/subject-guidance/airquality/process.html#:~:text=The%20Twin%20Cities%20area%20has,carbon%20monoxide%20(CO)%20violations

emit radiation are proportional to temperature. Because the earth has a much lower temperature than the sun, it emits lower-frequency radiation. Most solar radiation passes through GHGs; however, infrared radiation is absorbed by these gases. As a result, radiation that otherwise would have escaped back into space is instead "trapped," resulting in a warming of the atmosphere. This phenomenon, known as the greenhouse effect, is responsible for maintaining a habitable climate on earth.

The primary GHGs contributing to the greenhouse effect are carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O). Fluorinated gases also make up a small fraction of the GHGs that contribute to climate change. Examples of fluorinated gases include chlorofluorocarbons (CFCs), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), and nitrogen trifluoride (NF_3); however, it is noted that these gases are not associated with typical land use development. Human-caused emissions of GHGs exceeding natural ambient concentrations are believed to be responsible for intensifying the greenhouse effect and leading to a trend of unnatural warming of the earth's climate, known as global climate change or global warming.[7]

Project Related GHG Emissions

The AUAR will include an estimated quantification of the following GHG emissions associated with the proposed scenarios:

- Carbon dioxide (CO_2)
- Nitrous oxide (N_2O)
- Methane (CH_4)

The projected GHG emissions will be provided on an average annual basis using the CO_2 equivalent (CO_2e) and include the proposer's best estimate of average annual emissions over the proposed life/design service life of future development. The estimates will also include emissions from the construction and operating phases of the scenarios. Emissions will be estimated using the US Environmental Protection Agency's Simplified GHG Emissions Calculator (SGEC) (Version 7 June 2021)[8] and will be summarized by project phase (i.e., construction and operations) and source type (e.g., combustion from mobile equipment, off-site electricity).

b. GHG Assessment

i. Describe any mitigation considered to reduce the project's GHG emissions.

The AUAR will describe potential design strategies and sustainability measures for the proposed scenarios to reduce emissions.

ii. Describe and quantify reductions from selected mitigation, if proposed to reduce the project's GHG emissions. Explain why the selected mitigation was preferred.

The AUAR will describe and quantify reductions from selected mitigation options.

[7] Summarized from U.S. EPA, Overview of Greenhouse Gases: https://www.epa.gov/ghgemissions/overview-greenhouse-gases

[8] Source: https://www.epa.gov/climateleadership/simplified-ghg-emissions-calculator

iii. Quantify the proposed project's predicted net lifetime GHG emissions (total tons per number of years) and how those predicted emissions may affect achievement of the Minnesota Next Generation Energy Act goals and/or other more stringent state or local GHG reduction goals.

The Next Generation Energy Act requires the state to reduce greenhouse gas emissions in the state by 80 percent between 2005 and 2050, while supporting clean energy, energy efficiency, and supplementing other renewable energy standards in Minnesota. The MPCA's biennial GHG emissions reduction report from 2021 identifies strategies for reducing emissions in the three economic sectors with the highest emissions – transportation, electricity generation, and agriculture, forestry, and land use.

The AUAR will discuss the expected lifespan of the project and calculate how many estimated metric tons of CO2 will be emitted over the project's lifespan. The proposer will evaluate implementing the sustainability measures described in the AUAR. To reduce operational emissions to the extent practicable. The proposed development scenarios will be built in compliance with state regulations and city code.

19. NOISE

Describe sources, characteristics, duration, quantities, and intensity of noise generated during project construction and operation. Discuss the effect of noise in the vicinity of the project including 1) existing noise levels/sources in the area; 2) nearby sensitive receptors; 3) conformance to state noise standards; and 4) quality of life. Identify measures that will be taken to minimize or mitigate the effects of noise.

AUAR Guidance: Construction noise need not be addressed in an AUAR, unless there is some unusual reason to do so. The RGU might want to discuss as part of the mitigation plan, however, any construction noise ordinances in effect.

If the area will include or adjoin major noise sources, a noise analysis is needed to determine if any noise levels in excess of standards would occur, and if so, to identify appropriate mitigation measures. With respect to traffic-generated noise, the noise analysis should be based on the traffic analysis of Item 18.

Existing Noise

The AUAR study area is currently single family residential, agricultural, and undeveloped land. Surrounding nearby receptors are single family residential homes surrounding the study area.

The existing ambient noise sources in the study area consist mainly of the surrounding roadways.

Construction Noise

As stated in the AUAR guidelines, construction noise need not be addressed unless there is some unusual reason to do so. No unusual circumstances have been identified that would necessitate a detailed construction noise analysis. The City of Chaska regulates the hours of operation for construction equipment.

Traffic Generated Noise

A sound increase of 3 dBA is barely noticeable by the human ear, a 5 dBA increase is clearly noticeable, and a 10 dBA increase is heard as twice as loud. For example, if the sound energy is doubled (i.e., the amount of traffic doubles), there is a 3 dBA increase in noise, which is just barely noticeable to most people. On the other hand, if traffic increases by a factor of 10, the resulting sound level will increase by about 10 dBA and be heard approximately twice as loud.

The AUAR will provide traffic volumes from the proposed development scenarios to determine if the traffic levels attributable to the project are below the amount that would generate a sound increase that could be noticeable.

Operational Noise

The Chaska Code of Ordinances regulates mechanical noise associated with building operation by the standards set by the MPCA. All future development will be required to comply with these requirements. The AUAR will include a discussion of operational noise and identify potential operational noise mitigation measures.

20. TRANSPORTATION

a. Describe traffic-related aspects of project construction and operation. Include 1) existing and proposed additional parking spaces; 2) estimated total average daily traffic generated; 3) estimated maximum peak hour traffic generated and time of occurrence; 4) source of trip generation rates used in the estimates; and 5) availability of transit and/or other alternative transportation modes.

The information listed above will be provided in the traffic and transportation analysis that will be included in the AUAR. Coordination will occur with the City of Chaska and Carver County to determine the scope and locations of the analysis for the traffic study. The trip generation will be calculated based on ITE trip generation rates.

Transit

Currently, there is a Southwest Transit Station approximately 1 mile south of AUAR site. It is not anticipated that there will be significant change in transit usage.

Bike and Pedestrian Infrastructure

There are currently multi-use paths on most roadways in the study area. Future City and County Bike and Pedestrian Plans will be reviewed as part of the AUAR.

b. Discuss the effect on traffic congestion on affected roads and describe any traffic improvements necessary. The analysis must discuss the project's impact on the regional transportation system. If the peak hour traffic generated exceeds 250 vehicles or the total daily trips exceeds 2,500, a traffic impact study must be prepared as part of the EAW. Use the format and procedures described in the Minnesota Department of Transportation's Access Management Manual, Chapter 5 (available at: http://www.dot.state.mn.us/accessmanagement/resources.html) or a similar local guidance.

AUAR Guidance: For AUAR reviews, a detailed traffic analysis will be needed, conforming to the MnDOT guidance as listed on the EAW form. The results of the traffic analysis must be used in the response to Items 16 and 17.

A traffic impact study will be completed as part of the AUAR because the trip generation is anticipated to exceed the 250-trip peak hour vehicle threshold. The traffic impact study will be summarized in the AUAR, including information on estimated traffic generation, traffic impacts, relevant information from relevant transportation plans and traffic studies, and potential improvements and mitigation measures. The analysis will be completed for the following scenarios:

- Existing Conditions
- Opening Year No-Build Conditions
- Opening Year Partial Buildout Conditions
- Horizon Year No-Build Conditions
- Horizon Year Buildout Conditions

The AUAR will include intersection capacity analyses for intersections adjacent to the AUAR study area and will include the review of intersection operations at site access points. The following intersections are proposed to be included in the analysis and are shown in Figure 13:

- Engler Boulevard & Hwy 212 Westbound Ramps
- Engler Boulevard & Hwy 212 Eastbound Ramps
- Engler Boulevard & Chaska Creek Boulevard
- Engler Boulevard & Jonathan Carver Parkway
- Chaska Creek Boulevard & Creek Road
- Big Woods Boulevard & Hwy 212 Westbound Ramp
- Big Woods Boulevard & Hwy 212 Eastbound Ramp
- Jonathan Carver Parkway & Big Woods Boulevard
- Jonathan Carver Parkway & Chaska Boulevard
- Jonathan Carver Parkway & Hwy 212 Westbound Ramps
- Jonathan Carver Parkway & Hwy 212 Eastbound Ramps

Additionally, the following intersections will be included in the analysis but are not currently shown in Figure 13.

- Proposed public roadway Intersections from the site

The traffic impact study will also consider the following future planned roadways near the AUAR study area:

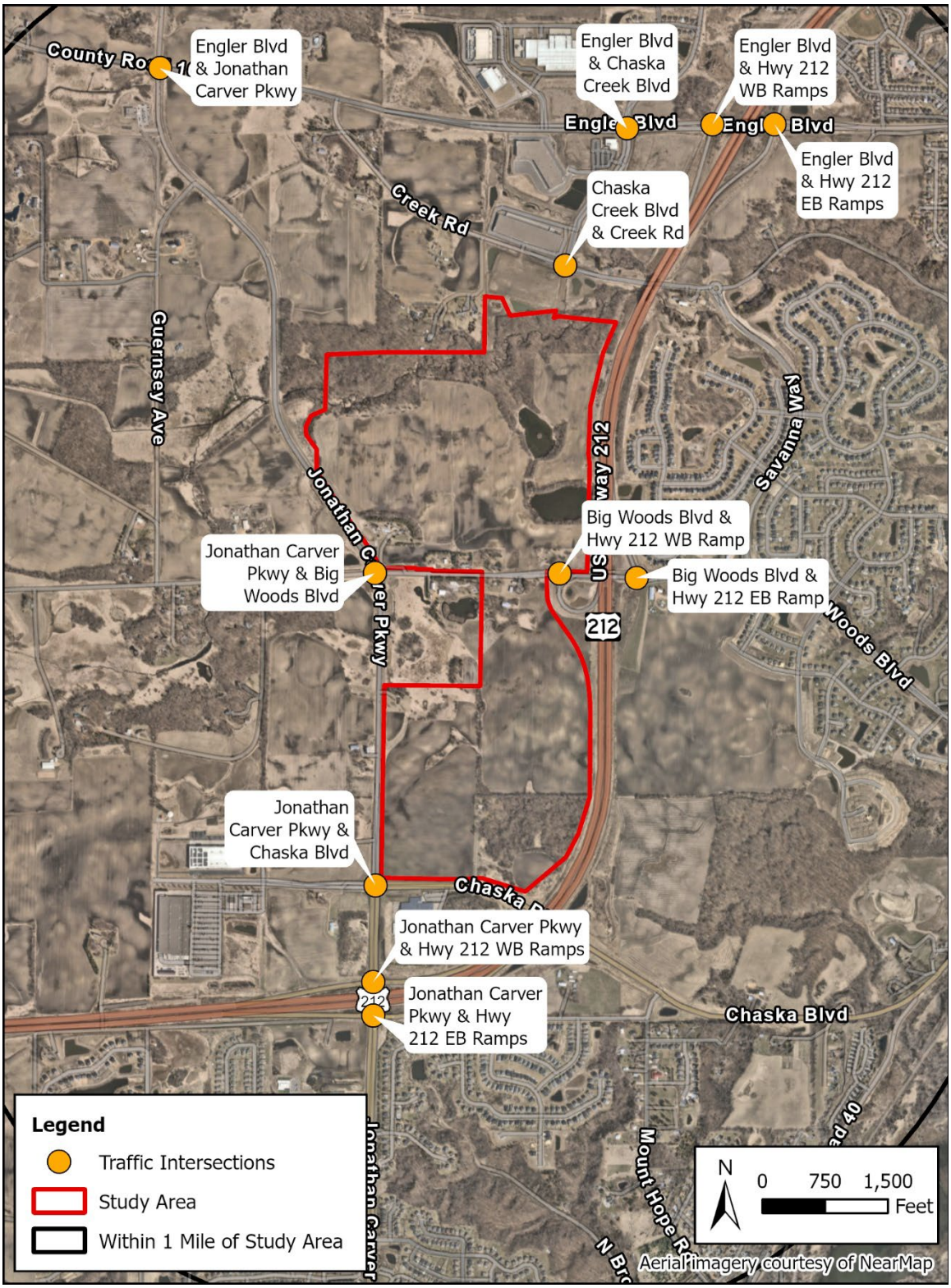
- Completion of the interchange at Hwy 212 and Big Woods Boulevard (County Road 44)

- Future road/creek crossing near Creek Road and Hwy 212

c. Identify measures that will be taken to minimize or mitigate project related transportation effects.

The AUAR will address any mitigation measures identified through the traffic analysis.

Figure 13: Traffic Study Intersections



21. CUMULATIVE POTENTIAL EFFECTS

AUAR Guidance: Because the AUAR process by its nature is intended to deal with cumulative potential effects from all future developments within the AUAR area, it is presumed that the responses to all items on the EAW form automatically encompass the impacts from all anticipated developments within the AUAR area.

However, the total impact on the environment with respect to any of the items on the EAW form may also be influenced by past, present, and reasonably foreseeable future projects outside of the AUAR area. The cumulative potential effect descriptions may be provided as part of the responses to other appropriate EAW items, or in response to this item.

a. Describe the geographic scales and timeframes of the project related environmental effects that could combine with other environmental effects resulting in cumulative potential effects.

Cumulative effects are defined as the "effect on the environment that results from the incremental effects of a project in addition to other projects in the environmentally relevant area that might reasonably be expected to affect the same environmental resources, including future projects actually planned or for which a basis of expectation has been laid, regardless of what person undertakes the other projects or what jurisdictions have authority over the projects."[9] The geographic areas considered for cumulative effects are those areas adjacent to the study area and generally a combination of the study areas defined in the sections above, and the timeframe considered includes projects that would be constructed in the reasonably foreseeable future (by 2030) by other private and public entities that have made future project plans and timelines publicly available.

b. Describe any reasonably foreseeable future projects (for which a basis of expectation has been laid) that may interact with environmental effects of the proposed project within the geographic scales and timeframes identified above.

The AUAR will identify any additional reasonably foreseeable projects that may interact with the environmental effects of the development scenarios.

c. Discuss the nature of the cumulative potential effects and summarize any other available information relevant to determining whether there is potential for significant environmental effects due to these cumulative effects.

The AUAR will include a discussion of potential cumulative effects associated with nearby ongoing or planned projects.

[9] Minnesota Rules, part 4410.0200, subpart 11a

22. OTHER POTENTIAL ENVIRONMENTAL EFFECTS

AUAR Guidance: If the project may cause any additional environmental effects not addressed by Items 1 to 19, describe the effects here, discuss the how the environment will be affected, and identify measures that will be taken to minimize and mitigate these effects.

Additional Environmental Effects

Any other potential environmental effects will be addressed in the AUAR.

ATTACHMENT B: COMMENT RESPONSES

OVERVIEW

Pursuant to Minnesota Rules, part 4410.3610, subpart 5a(C), the purpose of the comments on a Scoping Document for an Alternative Urban Areawide Review (AUAR) is to suggest additional development scenarios and relevant issues to be analyzed in the review. Comments may suggest alternatives to the specific large project or projects proposed to be included in the review, including development at sites outside of the proposed geographic boundary. The comments must provide reasons why a suggested development scenario or alternative to a specific project is potentially environmentally superior to those identified in the Responsible Governmental Unit's (RGU's) draft order.

The 30-day Scoping Environmental Assessment Worksheet (EAW) comment period began September 23, 2025, and comments were accepted through October 23, 2025. During the public comment period, comments were received from five government agencies. Responses to the agency comments are included in Table 1. Copies of the comment letters are included in Attachment C.

AGENCY COMMENTS

Table 1. Government Agency Comments and Responses

Comment	Response
1. DNR	
1. Page 6, Project Description; page 16, Table 5. Both scenarios include over one million square feet (1.8 and 2.7 million square feet) of "office/industrial" development, but the final uses are not specified. Would data centers be one of the possible uses for either scenario? If so, this should be fully described in the AUAR.	Thank you for your review. Data centers are not being considered or evaluated in either scenario.
2. Page 10, Table 2. Climate Considerations and Adaptations. As energy needs and renewable energy goals put further pressure on agricultural lands, some communities have started to tap into industrial facilities to combine development with energy production through the use of rooftop solar. Installing solar panels on industrial facilities has the added benefit of producing energy right where it is needed without any additional facility footprint. We encourage the City as well as local energy providers to explore the feasibility of combining these land uses to help meet state climate goals as the City plans for the future. We encourage the developer to consider installing water reuse systems to reduce water usage, and utilize other water conservation measures to the greatest extent possible.	The developer(s) will consider the use of solar panels, installing water reuse systems and other water conservation measures. These and other climate adaption considerations will be included in the AUAR.

Comment	Response
4. Page 14, Table 4: Anticipated Permits and Approvals. A Utility Crossing License will be needed from the DNR's Land and Minerals division for extension of the municipal water system and crossing of Unnamed Public Watercourse (M-055-022-001).	This permit was added to Table 4 (Permits) in the Final Order and Scoping Document.
5. Page 17, Zoning. Unnamed Public Watercourse (M-055-020-001) is identified in the City of Chaska's Shoreland Management ordinance and therefore present within a shoreland overlay district.	The applicable development requirements for the Public Watercourse have been added to the Final Order and Scoping Document in Item 10 (Land Use).
6. Page 31, Stormwater. The DNR recommends that stormwater be used for the irrigation of the 15 acres of landscaping. The re-use of stormwater for irrigation will reduce the volume of stormwater and stormwater pollution flowing downstream of the site. In addition, using stormwater for landscaping irrigation will conserve valuable groundwater for household use.	Comment noted, discussion of stormwater and irrigation will be included in the AUAR.
7. Page 31, Stormwater. Either development scenario would significantly increase the amount of impervious surfaces within the project area, and consequently the amount of road salt used for winter maintenance. Chloride released into local lakes, streams, and groundwater does not break down, and instead accumulates in the environment, potentially reaching levels that are toxic to aquatic wildlife and plants. Consider promoting local business and city participation in the Smart Salting Training offered through the Minnesota Pollution Control Agency. There are a variety of classes available for road applicators, sidewalk applicators, and property managers. More information and resources can be found at this website. Many winter maintenance staff who have attended the Smart Salting training — both from cities and counties and from private companies — have used their knowledge to reduce salt use and save money for their organizations. We encourage cities and counties to consider how they may participate in the Statewide Chloride Management Plan and provide public outreach to reduce the overuse of chloride. Here are some educational resources for residents as well as a sample ordinance regarding chloride use.	Comment noted, discussion of stormwater and chloride management will be included in the AUAR. The City has implemented several policies and measures to reduce overuse of chloride.
8. Page 32, Water Appropriation. A DNR Water Appropriation Permit is required if the water pumped exceeds 10,000 gallons in a day, or one million gallons in one year. The DNR General Permit for Temporary Appropriation, with its lower permit application fee and reduced review time, may be used for dewatering if the dewatering volume is less than 50 million gallons and the appropriation is for less than 1 year.	Comment noted, further discussion of water appropriation will be included in the AUAR.

Comment	Response
If water for dust control is taken from a non-municipal well, a lake, or a stream, then a DNR Water Appropriation Permit is required if the volume of water taken exceeds 10,000 gallons in a day, or one million gallons of water in a year. Several calcareous fens are present within 5 miles of the proposed development. Applicants for DNR water appropriation permits should be aware that additional review time may be required to assess potential impacts on calcareous fens.	
9. Page 32, Water Appropriation. The AUAR should address the water demands for the site and the existing city water system capacity. It will be important for the upcoming AUAR to follow the AUAR Guidance in the instructions that says, "*If the area requires new water supply wells, specific information about that appropriation and its potential impacts on groundwater levels should be given; if groundwater levels would be affected, any impacts resulting on other resources should be addressed*." In the upcoming AUAR, please include: a. Details on water demand for each of the scenarios and compare that demand with the City's current permitted volume and production capabilities. If the area requires new water supply wells, specific information about that appropriation and its potential impacts on groundwater levels should be given; if groundwater levels would be affected, any impacts resulting on other resources should be addressed. The siting of new well(s) would be very important to this analysis. b. Evaluation of anew or amended DNR Water Appropriation Permit must include consideration of the sustainability standard (MN statute 103G.287 Subd.5). As per instructions for completing 12.b.iii, please: i. Discuss how the proposed water use is resilient in the event of changes in total precipitation, large precipitation events, drought, increased temperatures, variable surface water flows and elevations, and longer growing seasons. ii. Identify any measures to avoid, minimize, or mitigate environmental effects from the water appropriation. iii. Describe contingency plans should the appropriation volume increase beyond infrastructure capacity or water supply for the project diminish in quantity or quality,	Comment noted, information about water demands and existing city water system capacity will be included in the AUAR. Data centers or similar high water users, are not being considered or evaluated in either scenario.

Comment	Response
such as reuse of water, connections with another water source, or emergency connections. Please note that MN statute 103G.265, Subd. 5was amended (effective immediately) during the recent legislative session. This allows permitting agencies to request preapplication information from the data center and or municipality that will be serving the data center, which will be helpful in assessing the factors affecting the ability of a water source to meet a projects water use needs at the proposed location. This includes: (1) a project description; (2) the project's estimated water use rates and volumes for the maximum day, maximum month, and average year; (3) the anticipated source of water; and (4) water quality or temperature requirements. The department may request any additional information necessary from the data center to assist it to assess the ability of a water source to meet a project's water use needs.	
10. Page 33, Other Surface Waters. A calcareous fen (Seminary Fen, ID# 20977) has been documented in the vicinity of the proposed project. A calcareous fen is a rare and distinctive peat-accumulating wetland that is legally protected in Minnesota. The Wetlands Conservation Act (WCA), authorized by Minnesota Statutes, section 103G.223, states that calcareous fens may not be filled, drained, or otherwise degraded, wholly or partially, by any activity, except as provided for in a management plan approved by the commissioner of the Department of Natural Resources. Many of the unique characteristics of calcareous fens result from the upwelling of groundwater through calcareous substrates. Because of this dependence on groundwater hydrology, calcareous fens can be affected by nearby activities or even those several miles away. For more information regarding calcareous fens, please see the Calcareous Fen Fact Sheet. To minimize stormwater impacts, please refer to the Minnesota Pollution Control Agency's General Principles for Erosion Prevention and Sediment Control in the Minnesota Stormwater Manual. Please note that calcareous fens are "Special Waters" and a buffer zone may be required. Calcareous fens may be impacted by activities within the fen, activities that affect surface water flows (e.g., stormwater flow, erosion), or activities that affect groundwater hydrology (e.g.	Comment noted, discussion of the calcareous fen was added to the Final Scoping Document and will be evaluated in the AUAR.

Comment	Response
groundwater pumping, contamination, discharge, or excavation). To ensure compliance under WCA, please contact the Calcareous Fen Program Coordinator, Keylor Andrews (Keylor.Andrews@state.mn.us).	
11. Page 37, State-Listed Species. This section states to attach the Natural Heritage Review letter from DNR. Please submit the project to Minnesota Conservation Explorer to obtain this letter to include in the Draft AUAR.	This letter has since been obtained and will be included as an attachment of the AUAR.
12. Page 49, Cumulative Potential Effects. When considering cumulative potential effects, the AUAR should consider the water needs and source of the proposed scenarios and fully evaluate, based on if/where new wells would be constructed, what aquifer would be utilized, and what resources are within the vicinity that could be affected by the increase in groundwater pumping.	Data centers are not being considered or evaluated in either scenario. The proposed development is not anticipated to significantly increase groundwater pumping.
2. SHPO	
As stated in the Scoping Document, there are several inventoried properties within the AUAR Study Area, none of them are listed in the National or State Registers of Historic Places. The Henry Ortlip House appears to have been demolished in 2005.	Thank you for your review.
We recommend that an archaeological survey be conducted within the proposed development area with the goals of 1) identifying archaeological sites within the project boundary that have not been previously documented and 2) evaluating any sites that are identified to determine their historical significance and eligibility for listing in the National Register of Historic Places. The archaeological survey report should be uploaded by the consulting archaeologist to the Office of the State Archaeologist's Portal following the guidance on our website: https://mn.gov/admin/shpo/surveyandinventory/manual/. The response to question 15 in the AUAR should include the results of the archaeological survey, leaving out the locations of any archaeological sites identified (that data has been determined to be non-public in state and federal law), but describing their significance. The archaeological survey will inform the need for any mitigation strategies for historic properties. Lacking an archaeological survey, it is not clear how mitigation strategies will be developed for any historic properties that are identified.	An archeological survey is currently being coordinated and may not be complete at the time that the AUAR is published. Completion of an archaeological survey will be included as a mitigation measure in the AUAR.

Comment	Response
Please note that this comment letter does not address the requirements of Section 106 of the National Historic Preservation Act of 1966 and 36 CFR § 800. If this project is considered for federal financial assistance, or requires a federal permit or license, then review and consultation with our office will need to be initiated by the lead federal agency. Be advised that comments and recommendations provided by our office for this state-level review may differ from findings and determinations made by the federal agency as part of review and consultation under Section 106.	Comment noted.
3. Met Council	
Item 7: Climate *(MacKenzie Young-Walters, 651-602-1373)* The proposed scope of discussion for the climate item identifies appropriate resources for projecting climate trends and the proposed discussion of adaptation strategies is appropriate. The presence of a stream and large wetland in the northern portion of the site may justify a more robust discussion of and mitigation strategy for precipitation and flood risk trends than would ordinarily be required.	Thank you for your review.
Item 9: Permits and Approvals Required *(MacKenzie Young-Walters, 651-602-1373)* The portion of the project within Dahlgren Township will need to be annexed and a comprehensive plan amendment will be needed to establish land use guidance and Metropolitan Urban Service Area (MUSA) staging for that portion of the project. Additionally, a comprehensive plan amendment will be needed to remove the areas of the project intended for unsewered development (i.e. the rural residential areas) from the MUSA.	Comment noted, this will be noted in the AUAR. At this time, there is no intent to remove the areas of the project intended for unsewered development.
Item 10: Land Use (*Colin Kelly, 651-602-1361)* There is one unit of the Regional Parks and Trails System in the vicinity of the AUAR study area. An existing segment – Segment 3 – of the Southwest Regional Trail is approximately 500 feet north of the AUAR study area, at the intersection of Creek Road/County Road 10 and Chaska Creek Boulevard. The regional trail has a 2023 Metropolitan Council-approved long-range plan developed by the trail's implementing agency, Carver County. Trail Segment 3 is depicted on pages 52 and 53 of the linked document. The AUAR should acknowledge the Southwest Regional Trail in Land Use section 10 a.i., Carver County's Southwest Regional Trail Long Range Plan in section 10 a.ii, and the Southwest Regional	Comment noted, information about the Southwest Regional Trail was added to the Final Order and Scoping Document in Item 10 (Land Use). The City intends to promote connections to nearby trails (including the Southwest Regional Trail) and foster pedestrian connections within the overall business park area. This will be further discussed in the AUAR.

Comment	Response
Trail in section 10 b. The RGU may also want to discuss under this item any proposed parks, recreation areas, or trails to be developed in conjunction with development of the AUAR area. Met Council Parks staff encourage the City of Chaska to develop a local trail connection from any future development in this area to the Southwest Regional Trail. Regional and local trail connections benefit residents and businesses alike.	
Item 10: Land Use *(Todd Graham, 651-602-1322)* In winter 2024-2025, Chaska city staff and Council staff discussed the potential for this business park. If fully developed with floor area ratio (FAR) that is typical of a suburban edge location, the subject area could accommodate up to 3 million square feet of built floorspace and up to 3,000 jobs. Council staff invite Chaska planners to discuss the employment forecast impacts with us as the City prepares for its 2050 Plan development.	Comment noted, the City will continue to coordinate with the Metropolitan Council regarding employment forecasts.
Item 12: Water Resources **Section a.i. Surface Water and b.ii. Stormwater** *(Maureen Hoffman, 651-602-8026)* The AUAR should describe the steps that will be taken to prevent negative impacts to the impaired stream on the property. A Total Maximum Daily Load (TMDL) has been approved for the stream and the RGU should work closely with the watershed to help improve stream water quality. Developments within the AUAR area should complement these efforts. Additionally, there are a number of wetlands on the site. Wetlands provide important ecosystem services and should be preserved. To this end, the RGU should work to minimize any impacts to these wetlands and provide discussion on how impacts can be avoided. If impacts cannot be avoided, the RGU should provide discussion on why the impacts are necessary.	Comment noted, details regarding surface water and wetland impacts will be discussed in the AUAR.
Section b.i. Wastewater (*Roger Janzig, 651-602-1119)* Annexation of the land areas currently in Dahlgren Township will need to be completed before the extension of utility services can be initiated, and a comprehensive plan amendment for staging inside the current 2030 MUSA would need to be submitted and authorized by the Council before development could commence in the respective AUAR area currently in Dahlgren Township.	The annexation of the Dahlgren Township parcels will be discussed in the AUAR.
Section b.iii. Groundwater *(John Clark, 651-602-1452)*	Comment noted, this will be discussed in the AUAR.

Comment	Response
The water appropriation section should consider how the development scenarios align (or not) with the City of Chaska's DNR approved Local Water Supply Plan, including assessing if additional water appropriations will be needed to meet the demands of either development scenario. In the water resources groundwater section, the AUAR should discuss how changes in land use and land cover, including increases in impervious surfaces, could impact infiltration, recharge, and groundwater connections with nearby wetlands and surface waters. The AUAR should consider how changing climate including extreme weather events like heatwaves and drought may affect water demands, while identifying opportunities to promote efficient water use and conservation of source waters. These may include drought tolerant landscaping with native species, limiting or removing irrigated areas, utilizing smart technologies and appliances that improve water use efficiency.	
Item 18: Greenhouse Gas Emissions (GHG) *(Mackenzie Young-Walters, 651-602-1373)* The proposed scope of discussion for the GHG Emissions/Carbon Footprint item is adequate. No unique features are present that would require any extraordinary GHG/mitigation considerations, though the project proposer should include a discussion of how the different intensity of uses between the scenarios facilitates different/expanded mitigation measures.	Thank you for your review.
Item 20: Transportation (*Joe Widing, 651-602-1822*) The traffic impact study should consider two programmed roadway projects within the study area included in 2026-2029 TIP: 1) Carver CSAH 11 and CSAH 10 intersection improvements project which will reconstruct the intersection and expand CSAH 11 to a four-lane divided roadway in 2028; and, 2) Carver CSAH 11 and CSAH 44 intersection safety improvements project which construct a single lane roundabout at the intersection in 2028.	Comment noted, roadway improvements will be incorporated in the analysis.
4. Carver County	
Water Management Organization 1. Permits. Table 4 correctly identifies that a water rules permit from the Carver County Planning and Water Management Department/Carver County Water Management Organization (CCWMO) will be required. Additionally, once properties are annexed to the city of Chaska, the City of Chaska will act as LGU for wetland permits.	Thank you for your review.

Comment	Response
2. Stormwater – Areawide Approach. The County strongly encourages that the developer(s) for these areas consider an overall approach to stormwater management for the AUAR area. The developer(s) should coordinate with the city of Chaska and the County early in the development process on proposed stormwater management practices and siting. Protection or restoration of natural upland areas can be eligible for use as a volume control stormwater strategy.	Comment noted.
3. Stormwater –Adjacent property impacts. Please note that the CCWMO reviews for potential stormwater related impacts to upstream and downstream properties. Please see below for a summary of requirements. a. Upstream. Drainage flowing onto the site from upstream areas must be managed and accommodated. Alterations to flow paths which impound or slow down water will not be allowed unless it can be shown that the upstream system can accommodate the change. b. Downstream. i. To the extent possible, existing drainage areas and discharge points from the site should be maintained post-development and concentrated flows onto neighboring properties should be avoided or mitigated. The downstream conveyance system (natural or structural) must be able to accommodate, to the nearest major receiving waterbody, increased volumes caused by development. ii. If diversions from existing drainage areas and alterations to discharge points are proposed, the responsible party shall provide additional documentation (rates, volumes, velocities, duration of flow, etc.) to demonstrate that the downstream conveyance system can accommodate the change. The responsible party shall provide evidence of easements or other agreements concerning water flow if a plan iii. involves increased impervious or directing concentrated runoff onto a neighboring property.	These stormwater requirements will be included in the AUAR.
Public Works 4. Traffic Impact Analysis. Please include a 20-year scenario in the traffic impact analysis.	The 20-year analysis will be included in the traffic analysis as part of the AUAR.
5. *MnDOT*	

Comment	Response
Thank you for submitting the Big Woods Business Park AUAR project for review. The Minnesota Department of Transportation (MnDOT) has reviewed the plans and has no comments to make on this project.	Thank you for your review.

ATTACHMENT C: COMMENT LETTERS

DEPARTMENT OF NATURAL RESOURCES

Division of Ecological and Water Resources
Region 3 Headquarters
1200 Warner Road
Saint Paul, MN 55106

Transmitted by Email

October 23, 2025

Elizabeth Hanson, AICP
City Planner
One City Hall Plaza
Chaska, MN 55318

Dear Elizabeth Hanson,

Thank you for the opportunity to review the Big Woods Business Park Scoping Document in preparation for an Alternative Urban Areawide Review (AUAR) for the project area located in Carver County. The DNR respectfully submits the following comments for your consideration:

1. Page 6, Project Description; page 16, Table 5. Both scenarios include over one million square feet (1.8 and 2.7 million square feet) of "office/industrial" development, but the final uses are not specified. Would data centers be one of the possible uses for either scenario? If so, this should be fully described in the AUAR.
2. Page 10, Table 2. Climate Considerations and Adaptations. As energy needs and renewable energy goals put further pressure on agricultural lands, some communities have started to tap into industrial facilities to combine development with energy production through the use of rooftop solar. Installing solar panels on industrial facilities has the added benefit of producing energy right where it is needed without any additional facility footprint. We encourage the City as well as local energy providers to explore the feasibility of combining these land uses to help meet state climate goals as the City plans for the future.

   We encourage the developer to consider installing water reuse systems to reduce water usage, and utilize other water conservation measures to the greatest extent possible.
3. Page 12, Cover Types. Table 3 only shows the existing cover types within the project area. The AUAR should also include the proposed cover types for each development scenario.
4. Page 14, Table 4: Anticipated Permits and Approvals. A Utility Crossing License will be needed from the DNR's Land and Minerals division for extension of the municipal water system and crossing of Unnamed Public Watercourse (M-055-022-001).
5. Page 17, Zoning. Unnamed Public Watercourse (M-055-020-001) is identified in the City of Chaska's Shoreland Management ordinance and therefore present within a shoreland overlay district.

6. Page 31, Stormwater. The DNR recommends that stormwater be used for the irrigation of the 15 acres of landscaping. The re-use of stormwater for irrigation will reduce the volume of stormwater and stormwater pollution flowing downstream of the site. In addition, using stormwater for landscaping irrigation will conserve valuable groundwater for household use.

7. Page 31, Stormwater. Either development scenario would significantly increase the amount of impervious surfaces within the project area, and consequently the amount of road salt used for winter maintenance. Chloride released into local lakes, streams, and groundwater does not break down, and instead accumulates in the environment, potentially reaching levels that are toxic to aquatic wildlife and plants. Consider promoting local business and city participation in the Smart Salting Training offered through the Minnesota Pollution Control Agency. There are a variety of classes available for road applicators, sidewalk applicators, and property managers. More information and resources can be found at this website. Many winter maintenance staff who have attended the Smart Salting training — both from cities and counties and from private companies — have used their knowledge to reduce salt use and save money for their organizations.

   We encourage cities and counties to consider how they may participate in the Statewide Chloride Management Plan and provide public outreach to reduce the overuse of chloride. Here are some educational resources for residents as well as a sample ordinance regarding chloride use.

8. Page 32, Water Appropriation. A DNR Water Appropriation Permit is required if the water pumped exceeds 10,000 gallons in a day, or one million gallons in one year. The DNR General Permit for Temporary Appropriation, with its lower permit application fee and reduced review time, may be used for dewatering if the dewatering volume is less than 50 million gallons and the appropriation is for less than 1 year.

   If water for dust control is taken from a non-municipal well, a lake, or a stream, then a DNR Water Appropriation Permit is required if the volume of water taken exceeds 10,000 gallons in a day, or one million gallons of water in a year.

   Several calcareous fens are present within 5 miles of the proposed development. Applicants for DNR water appropriation permits should be aware that additional review time may be required to assess potential impacts on calcareous fens.

9. Page 32, Water Appropriation. The AUAR should address the water demands for the site and the existing city water system capacity. It will be important for the upcoming AUAR to follow the AUAR Guidance in the instructions that says, "*If the area requires new water supply wells, specific information about that appropriation and its potential impacts on groundwater levels should be given; if groundwater levels would be affected, any impacts resulting on other resources should be addressed*." In the upcoming AUAR, please include:

   a. Details on water demand for each of the scenarios, and compare that demand with the City's current permitted volume and production capabilities. If the area requires new water supply wells, specific information about that appropriation and its potential impacts on groundwater levels should be given; if groundwater levels would be affected, any impacts resulting on other resources should be addressed. The siting of new well(s) would be very important to this analysis.

b. Evaluation of a new or amended DNR Water Appropriation Permit must include consideration of the sustainability standard (MN statute 103G.287 Subd.5). As per instructions for completing 12.b.iii, please:

   i. Discuss how the proposed water use is resilient in the event of changes in total precipitation, large precipitation events, drought, increased temperatures, variable surface water flows and elevations, and longer growing seasons.

   ii. Identify any measures to avoid, minimize, or mitigate environmental effects from the water appropriation.

   iii. Describe contingency plans should the appropriation volume increase beyond infrastructure capacity or water supply for the project diminish in quantity or quality, such as reuse of water, connections with another water source, or emergency connections.

Please note that MN statute 103G.265, Subd. 5 was amended (effective immediately) during the recent legislative session. This allows permitting agencies to request preapplication information from the data center and or municipality that will be serving the data center, which will be helpful in assessing the factors affecting the ability of a water source to meet a projects water use needs at the proposed location. This includes:

(1) a project description;

(2) the project's estimated water use rates and volumes for the maximum day, maximum month, and average year;

(3) the anticipated source of water; and

(4) water quality or temperature requirements.

The department may request any additional information necessary from the data center to assist it to assess the ability of a water source to meet a project's water use needs.

10. Page 33, Other Surface Waters. A calcareous fen (Seminary Fen, ID# 20977) has been documented in the vicinity of the proposed project. A calcareous fen is a rare and distinctive peat-accumulating wetland that is legally protected in Minnesota. The Wetlands Conservation Act (WCA), authorized by Minnesota Statutes, section 103G.223, states that calcareous fens may not be filled, drained, or otherwise degraded, wholly or partially, by any activity, except as provided for in a management plan approved by the commissioner of the Department of Natural Resources. Many of the unique characteristics of calcareous fens result from the upwelling of groundwater through calcareous substrates. Because of this dependence on groundwater hydrology, calcareous fens can be affected by nearby activities or even those several miles away. For more information regarding calcareous fens, please see the Calcareous Fen Fact Sheet. To minimize stormwater impacts, please refer to the Minnesota Pollution Control Agency's General Principles for Erosion Prevention and Sediment Control in the Minnesota Stormwater Manual. Please note that calcareous fens are "Special Waters" and a buffer zone may be required.

    Calcareous fens may be impacted by activities within the fen, activities that affect surface water flows (e.g., stormwater flow, erosion), or activities that affect groundwater hydrology (e.g.,

groundwater pumping, contamination, discharge, or excavation). To ensure compliance under WCA, please contact the Calcareous Fen Program Coordinator, Keylor Andrews (Keylor.Andrews@state.mn.us).

11. Page 37, State-Listed Species. This section states to attach the Natural Heritage Review letter from DNR. Please submit the project to Minnesota Conservation Explorer to obtain this letter to include in the Draft AUAR.
12. Page 49, Cumulative Potential Effects. When considering cumulative potential effects, the AUAR should consider the water needs and source of the proposed scenarios and fully evaluate, based on if/where new wells would be constructed, what aquifer would be utilized, and what resources are within the vicinity that could be affected by the increase in groundwater pumping.

Thank you again for the opportunity to review this document. Please let me know if you have any questions.

Sincerely,

Melissa Collins
Regional Environmental Assessment Ecologist | Ecological and Water Resources
Minnesota Department of Natural Resources
Phone: 651-259-5755
Email: melissa.collins@state.mn.us

CC: Jake Kurth, Scannell Properties #771, LLC

Equal Opportunity Employer

DEPARTMENT OF ADMINISTRATION
STATE HISTORIC PRESERVATION OFFICE

October 23, 2025

Elizabeth Hanson
City Planner
City of Chaska
ehanson@chaska.mn.us

RE: Big Woods Business Park AUAR
T115 R23 S6 & S7, Chaska, Carver County
SHPO Number: 2025-1791

Dear Elizabeth Hanson:

Thank you for providing this office with a copy of the Scoping Document for the Big Woods Business Park AUAR. As stated in the Scoping Document, there are several inventoried properties within the AUAR Study Area, none of them are listed in the National or State Registers of Historic Places. The Henry Ortlip House appears to have been demolished in 2005.

We recommend that an archaeological survey be conducted within the proposed development area with the goals of 1) identifying archaeological sites within the project boundary that have not been previously documented and 2) evaluating any sites that are identified to determine their historical significance and eligibility for listing in the National Register of Historic Places. The archaeological survey report should be uploaded by the consulting archaeologist to the Office of the State Archaeologist's Portal following the guidance on our website: https://mn.gov/admin/shpo/surveyandinventory/manual/.

The response to question 15 in the AUAR should include the results of the archaeological survey, leaving out the locations of any archaeological sites identified (that data has been determined to be non-public in state and federal law), but describing their significance. The archaeological survey will inform the need for any mitigation strategies for historic properties. Lacking an archaeological survey, it is not clear how mitigation strategies will be developed for any historic properties that are identified.

Please note that this comment letter does not address the requirements of Section 106 of the National Historic Preservation Act of 1966 and 36 CFR § 800. If this project is considered for federal financial assistance, or requires a federal permit or license, then review and consultation with our office will need to be initiated by the lead federal agency. Be advised that comments and recommendations provided by our office for this state-level review may differ from findings and determinations made by the federal agency as part of review and consultation under Section 106.

If you have any questions regarding our review of this project, please contact Kelly Gragg-Johnson, Environmental Review Specialist, at kelly.graggjohnson@state.mn.us.

Sincerely,

Amy Spong
Deputy State Historic Preservation Officer

October 23, 2025

Elizabeth Hanson, City Planner
One City Hall Plaza
Chaska, MN 55318

RE: City of Chaska – Scoping Alternative Urban Areawide Review (AUAR) – Big Wood Business Park
Metropolitan Council Review File No. 23132-1
Metropolitan Council District No. 4

Dear Elizabeth Hanson:

Metropolitan Council staff completed its review of the Dakota East Area Scoping AUAR to determine its accuracy and completeness in addressing regional concerns. Staff conclude that the Scoping AUAR is complete and accurate with respect to regional concerns and does not raise major issues of consistency with Council policies. However, staff offers the following comments for your consideration:

Item 7: Climate *(MacKenzie Young-Walters, 651-602-1373)*
The proposed scope of discussion for the climate item identifies appropriate resources for projecting climate trends and the proposed discussion of adaptation strategies is appropriate. The presence of a stream and large wetland in the northern portion of the site may justify a more robust discussion of and mitigation strategy for precipitation and flood risk trends than would ordinarily be required.

Item 9: Permits and Approvals Required *(MacKenzie Young-Walters, 651-602-1373)*
The portion of the project within Dahlgren Township will need to be annexed and a comprehensive plan amendment will be needed to establish land use guidance and Metropolitan Urban Service Area (MUSA) staging for that portion of the project. Additionally, a comprehensive plan amendment will be needed to remove the areas of the project intended for unsewered development (i.e. the rural residential areas) from the MUSA.

Item 10: Land Use (*Colin Kelly, 651-602-1361)*
There is one unit of the Regional Parks and Trails System in the vicinity of the AUAR study area. An existing segment – Segment 3 – of the Southwest Regional Trail is approximately 500 feet north of the AUAR study area, at the intersection of Creek Road/County Road 10 and Chaska Creek Boulevard. The regional trail has a 2023 Metropolitan Council-approved long-range plan developed by the trail's implementing agency, Carver County. Trail Segment 3 is depicted on pages 52 and 53 of the linked document.

The AUAR should acknowledge the Southwest Regional Trail in Land Use section 10 a.i., Carver County's Southwest Regional Trail Long Range Plan in section 10 a.ii, and the Southwest Regional Trail in section 10 b. The RGU may also want to discuss under this item any proposed parks, recreation areas, or trails to be developed in conjunction with development of the AUAR area. Met Council Parks staff encourage the City of Chaska to develop a local trail connection from any future development in this area to the Southwest Regional Trail. Regional and local trail connections benefit residents and businesses alike.

Item 10: Land Use *(Todd Graham, 651-602-1322)*
In winter 2024-2025, Chaska city staff and Council staff discussed the potential for this business park. If fully developed with floor area ratio (FAR) that is typical of a suburban edge location, the subject area could accommodate up to 3 million square feet of built floorspace and up to 3,000 jobs. Council staff invite Chaska planners to discuss the employment forecast impacts with us as the City prepares for its 2050 Plan development.

Item 12: Water Resources

Section a.i. Surface Water and b.ii. Stormwater *(Maureen Hoffman, 651-602-8026)*
The AUAR should describe the steps that will be taken to prevent negative impacts to the impaired stream on the property. A Total Maximum Daily Load (TMDL) has been approved for the stream and the RGU should work closely with the watershed to help improve stream water quality. Developments within the AUAR area should complement these efforts.

Additionally, there are a number of wetlands on the site. Wetlands provide important ecosystem services and should be preserved. To this end, the RGU should work to minimize any impacts to these wetlands and provide discussion on how impacts can be avoided. If impacts cannot be avoided, the RGU should provide discussion on why the impacts are necessary.

Section b.i. Wastewater (*Roger Janzig, 651-602-1119)*
Annexation of the land areas currently in Dahlgren Township will need to be completed before the extension of utility services can be initiated, and a comprehensive plan amendment for staging inside the current 2030 MUSA would need to be submitted and authorized by the Council before development could commence in the respective AUAR area currently in Dahlgren Township.

Section b.iii. Groundwater *(John Clark, 651-602-1452)*
The water appropriation section should consider how the development scenarios align (or not) with the City of Chaska's DNR approved Local Water Supply Plan, including assessing if additional water appropriations will be needed to meet the demands of either development scenario.

In the water resources groundwater section, the AUAR should discuss how changes in land use and land cover, including increases in impervious surfaces, could impact infiltration, recharge, and groundwater connections with nearby wetlands and surface waters.

The AUAR should consider how changing climate including extreme weather events like heatwaves and drought may affect water demands, while identifying opportunities to promote efficient water use and conservation of source waters. These may include drought tolerant landscaping with native species, limiting or removing irrigated areas, utilizing smart technologies and appliances that improve water use efficiency.

Item 18: Greenhouse Gas Emissions (GHG) *(Mackenzie Young-Walters, 651-602-1373)*
The proposed scope of discussion for the GHG Emissions/Carbon Footprint item is adequate. No unique features are present that would require any extraordinary GHG/mitigation considerations, though the project proposer should include a discussion of how the different intensity of uses between the scenarios facilitates different/expanded mitigation measures.

Item 20: Transportation (*Joe Widing, 651-602-1822*)
The traffic impact study should consider two programmed roadway projects within the study area included in 2026-2029 TIP: 1) Carver CSAH 11 and CSAH 10 intersection improvements project which will reconstruct the intersection and expand CSAH 11 to a four-lane divided roadway in 2028;

and, 2) Carver CSAH 11 and CSAH 44 intersection safety improvements project which construct a single lane roundabout at the intersection in 2028.

The Council will not take formal action on the Scoping AUAR. If you have any questions regarding the review please contact MacKenzie Young-Walters, Principal Reviewer, at 651-602-1373 or via email at Mackenzie.Young-Walters@metc.state.mn.us

Sincerely,

Angela R. Torres, AICP, Senior Manager
Local Planning Assistance

CC: Tod Sherman, Development Reviews Coordinator, MnDOT - Metro Division
Deb Barber, Metropolitan Council District No. 4
Judy Sventek, Water Resources Manager
MacKenzie Young-Walters, Principal Reviewer
Reviews Coordinator

N:\CommDev\LPA\Communities\Chaska\Letters\Big Wood Business Park Scoping AUAR Ok with Comments 23132-1.docx

Public Services
Planning and Water Management Dept
Government Center - Administration Building
600 East 4th Street
Chaska, Minnesota 55318
Phone: (952)361-1820
www.co.carver.mn.us

October 23, 2025

Elizabeth Hanson, AICP
City of Chaska

RE: Big Woods Business Park AUAR

Dear Ms. Hanson,

Carver County appreciates the opportunity to review and comment on the Big Woods Business Park Alternative Urban Areawide Review (AUAR). Please consider the following comments.

Water Management Organization

1. **Permits.** Table 4 correctly identifies that a water rules permit from the Carver County Planning and Water Management Department/Carver County Water Management Organization (CCWMO) will be required. Additionally, once properties are annexed to the city of Chaska, the City of Chaska will act as LGU for wetland permits.

2. **Stormwater – Areawide Approach.** The County strongly encourages that the developer(s) for these areas consider an overall approach to stormwater management for the AUAR area. The developer(s) should coordinate with the city of Chaska and the County early in the development process on proposed stormwater management practices and siting. Protection or restoration of natural upland areas can be a eligible for use as a volume control stormwater strategy.

3. **Stormwater –Adjacent property impacts.** Please note that the CCWMO reviews for potential stormwater related impacts to upstream and downstream properties. Please see below for a summary of requirements.

    a. Upstream. Drainage flowing onto the site from upstream areas must be managed and accommodated. Alterations to flow paths which impound or slow down water will not be allowed unless it can be shown that the upstream system can accommodate the change.

    b. Downstream.
        i. To the extent possible, existing drainage areas and discharge points from the site should be maintained post-development and concentrated flows onto neighboring properties should be avoided or mitigated. The downstream conveyance system (natural or structural) must be able to accommodate, to the nearest major receiving waterbody, increased volumes caused by development.
        ii. If diversions from existing drainage areas and alterations to discharge points are proposed, the responsible party shall provide additional documentation (rates, volumes, velocities, duration of flow, etc.) to demonstrate that the downstream conveyance system can accommodate the change. The responsible party shall

provide evidence of easements or other agreements concerning water flow if a plan involves increased impervious or directing concentrated runoff onto a neighboring property.

Public Works

4. **Traffic Impact Analysis**. Please include a 20-year scenario in the traffic impact analysis.

Thank you for considering these comments in the Big Woods Business Park Alternative Urban Areawide Review. Please contact us with any questions of clarification.

Sincerely,

Kristen Larson

Kristen Larson
Carver County Planning & Water Management

Outlook

[Draft] Fw: [EXTERNAL]MnDOT Development Review | AUAR25-013 Big Woods Business Park AUAR

From Madeline.Roess@kimley-horn.com
Draft saved Tue 11/11/2025 2:15 PM

From: Elizabeth Hanson <EHanson@chaskamn.gov>
Sent: Wednesday, October 29, 2025 3:17 PM
To: Bunge, Leila <Leila.Bunge@kimley-horn.com>
Cc: Nate Kabat <nkabat@chaskamn.gov>
Subject: FW: [EXTERNAL]MnDOT Development Review | AUAR25-013 Big Woods Business Park AUAR

FYI

Elizabeth Hanson, AICP
City Planner
City of Chaska
952-448-9200

From: Burstein, Regina (She/Her/Hers) (DOT) <Regina.Burstein@state.mn.us>
Sent: Wednesday, October 29, 2025 3:15 PM
To: Elizabeth Hanson <EHanson@chaskamn.gov>
Cc: Swenson, Jason (DOT) <Jason.Swenson@state.mn.us>; Craig, E (DOT) <buck.craig@state.mn.us>; Nelson, Douglas (DOT) <douglas.nelson@state.mn.us>; Ramic, Almin (DOT) <almin.ramic@state.mn.us>; Kowski, Michael (DOT) <michael.p.kowski@state.mn.us>; Langenbach, Diane (DOT) <diane.langenbach@state.mn.us>; Gardner, Heather (DOT) <Heather.Gardner@state.mn.us>; Olson, Jordan (DOT) <jordan.olson@state.mn.us>; McCormick, Molly (She/Her/Hers) (DOT) <Molly.McCormick@state.mn.us>; Patel, Amrish (DOT) <amrish.patel@state.mn.us>; Sherman, Tod (DOT) <tod.sherman@state.mn.us>; Muhic, P Cameron (DOT) <cameron.muhic@state.mn.us>; Shaffer, Scott (He/Him/His) (DOT) <Scott.Shaffer@state.mn.us>
Subject: [EXTERNAL]MnDOT Development Review | AUAR25-013 Big Woods Business Park AUAR

Hello Elizabeth Hanson,

Thank you for submitting the Big Woods Business Park AUAR project for review. The Minnesota Department of Transportation (MnDOT) has reviewed the plans and has no comments to make on this project.

Feel free to contact me with any questions.

Thank you,

Regina Burstein
Senior Transportation Planner
MnDOT Metro District
regina.burstein@state.mn.us
651.234.7785

DEPARTMENT OF TRANSPORTATION