

701 East Broadway, Columbia, Missouri 65201

Department Source: Community Development - Planning

To: City Council

From: City Manager & Staff

Council Meeting Date: July 7, 2025

Re: 3501 New Haven Road – Permanent Zoning and RMH Park Plan (Case # 187-2025)

#### **Executive Summary**

Approval of this request would result in the permanent zoning of a 36.65-acre parcel of land currently zoned Boone County R-M (Moderate Density Residential) to City R-MH (Residential Manufactured Home) as well as approve an R-MH Park Plan governing the current and future use of the acreage which is presently improved with the Woodstock Mobile Home Park. These actions are subject to the approval of a concurrent annexation request (Case #226-2025) that appears on the Council's July 7 agenda as a Public Hearing matter. The concurrent annexation, permanent zoning, and R-MH Park Plan approvals will allow the property owners to connect approximately one-half the current 208 mobile home park (the Park) "pad sites" to the city's public sewer through an existing connection point in the Park's southwest corner.

It should be noted that one-half of the Park's pad-sites are already connected to city sewer through a previous "bulk" sewer service arrangement. Furthermore, approval of the pending actions on this parcel will ensure elimination of two Department of Natural Resources (DNR) non-compliant on-site sewage treatment plants.

#### Discussion

Luebbert Engineering (agent), on behalf of Woodstock MH, LLC (owner), is seeking approval of R-MH (Residential Manufactured Home) permanent zoning and R-MH Park Plan subject to annexation of a 36.65-acre parcel currently improved with the Woodstock Mobile Home Park. The requested permanent zoning, R-MH Park Plan, and concurrent annexation would result in the acreage becoming zoning compliant and permit the Park to be fully connected to public sewer service. The 36.65-acre subject site is located northwest of the intersection of Warren Drive and New Haven Road, is zoned Boone County R-M (Moderate Density Residential), and is commonly addressed as 3501 New Haven Road.

The precipitating factor for this request is to allow the owner the ability to connect approximately half of the existing mobile home park to the city's sanitary sewer system. This is necessary given the Park is presently contiguous with the city's municipal limits along its northwest and western boundaries pursuant to the provision of PR #115-97A. Furthermore, this request is being driven by the necessity to eliminate two Department of Natural Resources (DNR) non-compliant on-site sewage treatment facilities.

Presently approximately one-half of the 208 "pad sites" within the Park are connected to the city's treatment facilities via a previously approved "bulk" sewer service arrangement. The connected "pad sites" are generally located within the western and southwestern portions of the acreage. The western portion of the Park was originally developed between 1962 and 1968 per historical aerial map evaluation and the eastern portion was constructed



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sometime between 1968 and 1977. The eastern and western portions of the Park were originally operated as separate MHPs (mobile home parks); however, they have since been merged and were acquired by the applicant in June 2023.

Prior to August 1997 and adoption of PR #115-97A, the city often provided sewer to properties with no requirement for future annexation. PR #115-97A was adopted to ensure that the City had a means for orderly outward expansion and to address operational/maintenance issues associated with its public sewer facilities. The processes described in PR #115-97A have remained generally consistent as the city has expanded since 1997. The necessity to expand the number of "pad sites" connected the city's system is the driving factor for this request now. Had the existing on-site package treatment facilities been compliant with DNR requirements, the Park would have been capable of remaining outside the corporate limits.

Woodstock Mobile Home Park pre-dates the County's 1985 zoning regulations. The Park is considered "allowed" given the R-M district permits mobile home parks and subdivisions provided a conditional use permit has been issued. However, City is unaware of a conditional use permit being issued by the County for the continued operation of the Park. Given the Park pre-dates adoption of the 1985 County zoning regulations, the Park would be considered a "legal non-conformity". Based on aerial photography analysis it appears the Park has not been expanded since 1977.

The city has had R-MH standards since 1964 which have remained generally "static" over time and were readopted in March 2017 with the approval of the Unified Development Code (UDC). The UDC requirements for establishing a new mobile home park district or mobile home park subdivision are defined within Sec. 29-2.2(a) (4) and Sec. 29-5, respectively. Given that the existing Woodstock Mobile Home Park was developed without the oversight of the city's regulatory procedures many of the current adopted and applicable R-MH standards cannot be achieved. The attached Planning and Zoning Commission staff report provides an analysis of this level of non-compliance.

It is important to note that "pad sites" within an R-MH district are not required to be located on subdivided lots, but rather can be on one single "legal lot" and operated as a unified development. The applicant is not seeking to subdivide the property for individual lot sale; however, given the 36.65-acre parcel is not considered a "legal lot" by the UDC a future final plat to confer such status upon the acreage. This final plat and a likely development agreement will be submitted for Planning Commission and Council consideration. The attached R-MH Plan is considered the site's preliminary plat not unlike a PD Plan being considered a preliminary plat for land that is zoned PD.

The attached R-MH plan includes significant details among its 6 sheets. Sheet 1 is an overview sheet with general notes. Sheets 2 & 3 illustrate existing conditions using Boone County aerial photography as a background. Sheets 4 & 5 provide a more detailed view of the Park layout, existing infrastructure and planned infrastructure, and perimeter dimensional requirements. Also shown on Sheets 4 are inset diagrams intended to illustrate particular



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adjustments to sections of the Park being precipitated by roadway adjustment/improvements along New Haven and Warren Drive.

Finally, Sheet 6 of the R-MH Plan provides a detailed breakdown of the dimensional standards of each of the proposed future "pad sites" and how those "pad sites" either comply with or vary from the required standards of the R-MH district as shown in Sec. 29-2.2(a)(4) and Sec. 29-4.1(a), Table 4.1-1. The purpose for identifying the "pad sites" at this level of detail was to document the necessary dimensional "design exceptions" necessary on each pad site within the Park to ensure that following annexation/permanent zoning and roadway construction the total number of "pad sites" within the Park remains at 208.

Staff finds that based on the detailed analysis provided by the applicant's agent that more of the current Park "pad sites" are compliant that non-compliant with the minimal standards of the current R-MH district. Furthermore, without approval the dimensional "design exceptions" shown for non-compliant lots there would be an overall reduction in the number of sites being available for home. The housing provided within the Park represents a segment of available inventory that has decline over time. Preserving this type of housing is a essential as a means of ensuring the current housing shortage is not further exacerbated. Authorizing the "design exceptions" is not believed impactful on the broader community given the accommodation is specifically being authorized for an existing development that was never subject to regulatory review when constructed between 1962-1977.

In addition to the "design exceptions" to the minimum dimensional standards of the R-MH district, the applicant is also seeking relief from the requirement to install a perimeter buffer around the entire park and a reduce parking space provision by 85 total spaces. The Park has operated in its current configuration since 1977 without the required buffer and supplemental parking without apparent incident.

The Park is bounded on the north by vacant County R-M zoned land, the northwest by City IG Industrial-zoned land, and to the west by City M-C Mixed-Use Corridor/IG, and R-1 One-family Dwelling (New Haven Elementary School) zoned lands. South of New Haven Road is City M-C/M-N/R-MF zoned lands and east of Warren Drive is City A Agricultural zoned land which is part of the University of Missouri Research Farm. These land use conditions, coupled with the fact that no expansion of the park is proposed, would appear to support approval of the request to waive compliance with the perimeter buffer requirement of the R-MH district. It should be noted that if the Park were to be redeveloped or substantially modified, full compliance with the screening and buffering requirements would be triggered.

With respect to the requested waiver of parking it should be noted that a conflict exists between required parking shown within the R-MH district's "other standards" and those shown within the "Parking Table" of the Unified Development Code. In the R-MH district only one parking space per pad site is required, plus one additional space per 10 dwellings. Whereas, the requirements of the UDC parking table requires 2 spaces per dwelling. The applicant has verified that there are 331 spaces within the Park today when only 229 are



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required. When parking is calculated using the UDC parking table a minimum of 416 space would b required.

The difference between these two values (85 spaces) is the waiver that applicant is seeking. Again, given the duration of the Park's operation coupled with the fact that no expansion of the park is proposed and no apparent issues have arisen with the present deficiency, it would appear that no additional parking is truly warranted. Furthermore, additional impervious surfaces within the Park may trigger new stormwater improvements. The costs associated with these improvements could be transferred to Park residents in the form of greater lot rents. Such an outcome would undermine the intent of trying to preserve this development as an affordable alternative for community residents.

This matter was heard by the Planning and Zoning Commission at its June 5, 2025 public hearing. Staff provided its report and the applicant's agent gave a presentation and was available to answer questions. A member of the Park's management team was available to respond to Commissioner questions and public concerns. A single member of the public addressed the Commission expressing concerns about the lack of communication between Park residents and management as well as maintenance-related matters within the Park, specifically roadway conditions and dead trees.

Commissioners asked for staff clarification on when the dead and dangerous trees would be addressed and inquired if a permanent zoning could be conditioned on specific applicant performance to address "deferred maintenance" matters. Staff informed the Commission that the zoning requested could not be conditioned like PD (Planned Development) projects. Staff further informed Commissioners that upon annexation the city could require full compliance with respect to the removal of dead and/or diseased trees. The Park's management member noted that bids for tree removal were underway and that the lack of communication with Park residents would be discussed with others to avoid miscommunication in the future. The applicant's agent indicated that she had recommended that the roadway improvements be delayed to allow for infrastructure (i.e. water and sewer upgrades) to be completed. However, it was noted that the most severe potholes would be filled in with gravel to address the concerns expressed more immediately.

Following closure of the public hearing, there was additional Commissioner discussion. The Commission made a single motion to recommend approval of the permanent zoning and approval of the R-MH Park Plan inclusive of the design exceptions relating to pad-site dimensional standards as shown on Page #6 of the R-MH Park Plan, perimeter buffer/screening, and an 85-space vehicle parking reduction from the parking standards required by Sec. 29-4.3 of the UDC which was approved by a vote of 9-0. Following this motion and its approval, the Commission made a motion to have this matter put onto the Council's July 21 meeting agenda under "Old Business" to allow affected residents additional opportunity to address City Council with their concerns about Park Management's addressing maintenance and communication matters.



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A copy of the Planning and Zoning Commission staff report, location maps, R-MF Park Plan, and meeting minute excerpts are attached for review.

#### Fiscal Impact

Short-Term Impact: None. All costs associated with infrastructure expansion to accommodate future development will be borne by the applicant. Long-Term Impact: Long-term impacts will include costs associated with the treatment of discharged sewer, public safety services, and trash collection. These costs may or may not be off-set by increased property and sales taxes revenues as well as user fees.

### Strategic & Comprehensive Plan Impact

#### Strategic Plan Impacts:

Primary Impact: Reliable and Sustainable Infrastructure, Secondary Impact: Resilient

Economy, Tertiary Impact: Not Applicable

Comprehensive Plan Impacts:

Primary Impact: Land Use & Growth Management, Secondary Impact: Livable & Sustainable Communities, Tertiary Impact: Economic Development

Legislative History	
Date	Action
06/16/2025	Set a public hearing relating to annexation of this site. (R81-25)
03/18/2024	Request to Waive Required Annexation. (REP15-24)

### Suggested Council Action

Approve the requested R-MH zoning and R-MH Park Plan, inclusive of requested design exceptions relating to "pad-site" dimensional standards, perimeter buffering/screening, and required parking, on the 36.65-acre site presently occupied by the Woodstock Mobile Home Park as recommended by the Planning and Zoning Commission.