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April 21, 2025

City of Columbia  
701 East Broadway  
Columbia, MO 65205

**RE: Application for Permanent Zoning for Woodstock Mobile Home Park –  
Parcels #17-702-29-00-007.00 01 and #17-702-00-01-015.02 01  
(3501 New Haven Road, Columbia, Missouri 65201)**

To whom it may concern:

The purpose of this letter is to request the establishment of permanent zoning for the above referenced parcels in anticipation of an upcoming annexation application. I am writing this on behalf of the property owners, Woodstock MH, LLC. This project has been in development for several years, first with previous owners and, more recently, with the current owners.

The project began when the Missouri Department of Natural Resources indicated the need for the existing small package sewage treatment plants located in the northwest and northeast portion of this property to be closed permanently. These wastewater treatment facilities can no longer meet updated permit discharge limits. Given that approximately half the existing mobile homes are already connected to a sanitary sewer that discharges to the City's wastewater collection system, it only made sense to develop a plan to migrate the rest of the park onto the City's system by designing and installing two sewage pumping stations near the existing wastewater treatment facilities that would pump through small forcemain lines to the existing gravity system that discharges to the City's system.

However, one of the many the unintended consequences related to the need to connect the remainder of the park's sanitary sewers to the City's system is that annexation would be required. The new owners requested City staff review and confirm with the City Council that this was absolutely necessary given the many additional costs associated with annexation and platting this property. The annexation requirement was confirmed in May 2024. Given that decision, the owners began to assemble a plan of action to move forward with annexation including the establishment of permanent zoning.

The site was developed in unincorporated Boone County as a mobile home community sometime between 1962 and 1968 based on historic aerial photographs. The eastern portion of the park

(with separate main entrance) was developed sometime between 1968 and 1977. Originally, these were two separate mobile home parks but were later combined into single ownership. No significant change in the park has occurred since the 1970's. In those days, there were few requirements related to pad site (aka "mobile home lots") area, length, width, or setbacks.

In order to establish a permanent zoning of R-MH within the City of Columbia, which is consistent with its existing RM zoning in the County, the owners were required to prepare and submit a R-MH Development Plan which documents as much of the existing conditions as possible including several existing non-conformities with the City's zoning code and standards for mobile home pad sites. In the last several months, Patchett Land Surveying Company located all existing homes within the park and several of the existing storage sheds that exist along the perimeter of the site.

With that information, Luebbert Engineering began to develop the pad site layout to create lines that attempted to minimize the amount of zoning non-compliance. Many of the homes within the community are owner occupied and could be removed at their discretion in the future. Likewise, some mobile homes may come to the end of their useful life and need to be replaced. The intention will be to permanently keep the number of possible home sites at 208. This could include replacing homes if there is no increase in the level of zoning non-compliance in the future. The most basic layout of the pad sites is included in the R-MH development plan laid over the aerial photo (Sheets 2 and 3).

Once the pad site layout was completed, a spreadsheet was prepared that analyzed the zoning compliance based on City Code and based on proposed design adjustments. Groups of homes were also broken down into "blocks" to review the minimum compliance within each section of pad sites as well as the average values within these areas. This information is included on Sheet 6 of the R-MH Development Plan based on measurements of the surveyed locations of the homes shown on Sheets 4 and 5 of said plan.

Concurrent with the preparation of the final R-MH Development Plan, the Missouri Department of Transportation (MoDOT) has been in the planning and design phases of a major project that will affect the mobile home park's New Haven Road frontage. This project includes the relocation of the main entrance to the western portion of the mobile home park. MoDOT's engineers and consultants provided the CAD line work along this portion of their project. This was imported into the survey CAD file to review how pad site layouts would be affected. The MoDOT project will result in the relocation of one home to a "new" pad site that will be at the location of the existing western entrance. The details of this relocation are provided on Sheet 4 of 6 on the R-MH Development Plan. The purpose of including this information is to ensure the owner does not need to revisit the approved plan when this relocation is necessary.

The R-MH Development Plan will also serve as a preliminary plat for a future final plat of the property as the parcels do not currently exist as a “legal lot” per the City’s definition. The goal will be to prepare and submit the one-lot final plat near the end of Summer 2025 assuming the zoning and annexation proceed as expected. Because of this, it was necessary to include as much information about existing utilities as could be determined from historical records and field observation. Additionally, the existing easements are shown on the plan.

The platting process, that will proceed after the permanent zoning and annexation are approved, will trigger many other infrastructure improvements related to this property. First, there will be the two new sewage pump stations and forcemains that will be constructed to achieve the initial objective of providing City sewage treatment for the remainder of the park. The platting process will also dictate the construction of a 6” City water main extensions across the New Haven Road frontage and 6” extensions into the park to provide fire protection. The domestic water is currently provided by PWSD No. 9. The plan will be to eventually move the park’s master meters over to the new City water mains and to loop the new watermain within the park to provide sufficient connection between the existing domestic water distribution system and the new waterlines connected to the City’s system.

The platting process will also dictate the dedication of additional right-of-way along both New Haven Road (on the south) and Warren Drive (on the east). This will be to achieve the required 50’ half-width along New Haven Road and 33’ half-width along Warren Drive. An additional 10’ utility easement will be dedicated adjacent to the expanded right-of-way. Eventually, 5’ sidewalks would be required along each of these rights-of-way. The owners hope to negotiate a timeline for the construction of the sidewalks that will help mitigate the substantial costs associated with this project.

Unfortunately, several mobile homes are located such that the right-of-way and utility easement dedications, as well as the future sidewalk construction, will require additional changes to the existing pad site layout. Information about how the pad sites could be altered and the homes relocated or repositioned within these areas is included on Sheet 4 of 6. The intention would be to not relocate the homes along the Warren Drive right-of-way until that road is improved in the future. The sidewalk along New Haven Road would be constructed within 3 years of the final plat approval and would necessitate the revisions to the pad sites and home locations/orientations at that time. Again, the purpose of including this information of future anticipated impacts is to minimize the need to revisit this plan’s approval.

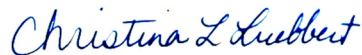
This site has existed as a thriving mobile home community for many decades and proposes to continue as such. The site is surrounded by a variety of other zoning uses, mostly located within the City of Columbia. To the west of the southern portion of the park, New Haven Elementary School’s land is zoned R-2. To the west of the northern portion of the park and wrapping around

the western portion of the north line of the park, properties that front on Lemone Industrial Boulevard have M-C Mixed Use Corridor and IG Industrial zoning. To the north of the portion of the park along Warren Drive, there is an existing residence outside of the City limits that is lumped in with the mobile home park's R-M County Zoning. To the east, across Warren Drive, the University of Missouri farm is zoned A Agricultural. To the south, across New Haven Road, there is a mix of M-C Mixed Use Corridor, M-N Mixed Use Neighborhood and R-MF Multi-Family Dwelling. Please refer to the Zoning Maps included with this application (both City and County information is provided).

There are too many individual variances from standards to enumerate here. The goal would be to accept the documentation of the existing conditions and to allow the areas of non-compliance to continue until such a time as the land is redeveloped into a significantly different or more intense use. We appreciate the time that the City Planning staff has put into assisting us with this process and look forward to finalizing the permanent zoning of R-MH for this site so that we may proceed with an annexation application in June 2025.

Please let me know if you need any further information. Thank you for your time and consideration of this matter.

Sincerely,



Christina L. Luebbert, P.E.  
Owner/Principal Engineer