

**AGENDA REPORT
PLANNING AND ZONING COMMISSION MEETING
June 5, 2025**

SUMMARY

A request by Luebbert Engineering (agent), on behalf of Woodstock MH, LLC (owner), seeking approval of RMH (Residential Manufactured Home) permanent zoning upon annexation. The subject site is presently improved with the Woodstock Mobile Home Park. The requested permanent zoning and concurrent annexation would 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.

DISCUSSION

Overview

The applicant is seeking approval of permanent RMH (Residential Mobile Home) district zoning upon a 36.65-acre parcel presently improved as the Woodstock Mobile Home Park (the Park) subject to annexation. The purpose for the request is to allow the owner the ability to connect approximately half of the existing Park to the city's sanitary sewer system and eliminate two Department of Natural Resources (DNR) non-compliant on-site sewage package treatment plants. As a result of this desire, the Park's adjacency to the city limits along its northwest and western boundaries, and pursuant provisions of Policy Resolution (PR) #115-97A this permanent zoning action is necessary. Prior to assignment of the requested RMH zoning, a concurrent hearing considering the merits of annexation will be considered by City Council. The annexation hearing is tentatively scheduled to occur on July 7, 2025 with a final reading on the annexation and permanent zoning being considered on July 21, 2025.

Presently approximately one-half of the 208 lots/units within the Park are connected to the city's treatment facilities via a previously approved "bulk" sewer service arrangement. The lots/units are generally located within the western and southwestern portions of the acreage. The western portion of the Park was originally created sometime between 1962 and 1968 per historical aerial map evaluation and the eastern portion was constructed sometime between 1968 and 1977. The eastern and western portions of the Park were originally operated as separate MHPs (mobile home parks); however, have since been merged and were acquired by the applicant in June 2023.

Prior to August 1997 and the adoption of PR #115-97A, the extension of sanitary sewer services to contiguous or non-contiguous properties was addressed through "bulk" sewer agreements with no requirement that the property receiving such service be obligated to annex into the city. Following adoption of PR #115-97A, non-contiguous properties were only permitted to receive city sanitary service subject to entering into an "annexation agreement". This agreement stipulates that once the property becomes contiguous to the city's municipal limits it must complete the "annexation" process. Additionally, PR #115-97A required that all contiguous parcels "directly" annex into the city to receive sanitary services. This PR 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 its 1997 adoption. The necessity to expand the number of mobile home lots/units 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.

The development that exists on the site predates the adoption of 1985 Boone County Zoning Regulations and is presently zoned R-M (Moderate Density Residential). The County's zoning regulations are considered "cascading" meaning, uses allowed in a lower district are permissible in the next most intense district. A mobile home park or mobile home subdivision are allowed in the R-M district given they are first shown as a permissible conditional use in the R-S (Single-family Residential) district. It should be noted that the City is unaware of a conditional use permit being issued by the County for the continued operation of the Park; however, given it 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.

According to available archived zoning records, the city has had RMH Park development standards since 1964. These standards have remained generally "static" overtime 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 RMH standards cannot be achieved. A detailed description of the relief necessary to accommodate the Park as it is presently developed and intended to remain is discussed in greater detail below.

It is further important to noted that lots/units within an RMH 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. If a park operator desires to make lots available for sale/purchase to individual mobile home owners, the RMH property would be required to conform to all UDC subdivision standards as well as all RMH zoning requirements. 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 will be presented for Planning Commission and Council consideration. The attached RMH Plan is considered the site's preliminary plat not unlike a PD Plan being considered a preliminary plat for land that is zoned PD.

Proposed RMH Plans

The applicant's design professional has submitted a highly detailed RMH Plan that illustrates the 2023 site conditions (Sheets 2 & 3) using Boone County aerial photography as a background which is then overlain with proposed future lot lines. Sheets 4 & 5 provide a more detailed view of the Park layout, existing and planned infrastructure, and perimeter dimensional requirements. Also shown on Sheets 4 are "inset" diagrams intended to illustrate particular adjustments to sections of the Park that are being impacted by on-going MoDOT work along New Haven Road to the south and work that will be triggered by the final platting of the site along Warren Drive to the east.

Finally, Sheet 6 of the RMH Plan provides a detailed breakdown of the dimensional standards of each of the proposed future lots and how those lots either comply with or vary from the required standards of the RMH district as shown in Sec. 29-2.2(a)(4) and Sec. 29-4.1(a), Table 4.1-1. This breakdown is illustrated in two ways. First, the lots are “grouped” such that those generally within the same location of the Park are compared against one another. Below each group of lots is an “average” dimensional standard line and a “minimum” standard line. Second, the lots are shown with a “color-code” that is tied to the notes in the lower left corner of the Sheet that describes the “design exceptions” that are being sought based upon the detailed lot analysis. The purpose for identifying and requesting approval of these “design exceptions” is to ensure that following annexation/permanent zoning and roadway construction the total number of lots/units within the development remains at 208.

Staff’s review of the detailed dimensional standards analysis finds that while several lots/units will not be capable of being brought into “full” compliance with the contemporary dimensional standards for the RMH district, there are a greater number of lots/units that are compliant. The instances of non-compliance (yellow and red highlighted cells) are often attributed to the original “radial” design of the Park and the fact that “pie-shaped” lots are inherently challenged in meet dimensional standards intended to be applied to “rectangular” lots.

The primary take-away from review of the dimensional standard analysis and the corresponding notes in the lower left corner of Sheet 6 should be that the level of non-conformity illustrated in the yellow and red cells **WILL NOT** be exacerbated as the Park continues to operate and replacement mobile homes are brought into the Park. The submitted RMH Plan, upon its approval, and specifically Sheet 6 will govern the future activities occurring on the 36.65-acre parcel.

Evaluation of the submitted RMH plans finds that there are several additional contemporary RMH district standards, aside from the dimensional requirements discussed above, that are not practically attainable or believed warranted to be applied to consideration of the Park’s permanent zoning and future annexation. Again, the underlying purpose for this request and the subsequent annexation is to resolve on-site waste disposal matters which have been non-compliant for nearly 10-years. Had the Park not be sold and acquired by the current owners in 2023, this fully functional Park may have closed eliminating the availability of an alternative housing option for Boone County residents.

The following observations of general non-compliance with applicable RMH district standards have been identified by staff. The applicant is seeking to have these deficiencies granted “design exceptions” such that once critical public infrastructure upgrades (i.e. sewer and water) have been made it is not also necessary to increase the monthly lot rental rate upon Park’s residents. The applicant’s design professional estimates that the cost of public infrastructure to make the Park regulatorily compliant would be approximately \$1,225,000.

The first major deficiency in contemporary compliance that has been identified has to deal with the required perimeter buffer and screening surrounding the Park acreage. The current RMH standards require an 8-foot tall screening device that is 80% opaque within 4 growing seasons. The Park has operated in its current configuration since 1977 without this buffer and without apparent incident. The Park is bounded on the north by vacant County R-M zoned land, the northwest by City IG zoned land, and to the west by City M-C/IG, and R-1 (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 zoned land which is part of MU’s research farm.

Given these surrounding zoning classifications, the length of time the Park has been actively operating, and the fact that the requested permanent zoning does not seeking to modify the existing characteristics of the Park except where required by platting or future roadway improvements, staff is supportive of the applicant's desire to not be required to comply with the perimeter buffer standards. It should be noted that if the property were to be redeveloped or substantially modified, full compliance with the screening and buffering requirements would be triggered.

A second area of non-compliance identified by the staff pertains to the lack of accessory vehicle storage areas. The contemporary RMH standards require that in addition to required parking spaces for each lot there must be 1 accessory space for each 10 manufactured homes. It should be noted that a conflict exists between required parking shown within the RMH district's "other standards" and those shown within the "Parking Table" of the UDC. The RMH district state only 1 parking space is required per home whereas the "Parking Table" requires 2 spaces per home.

When parking is calculated based on the RMH requirements, the Park is required to have 229 parking spaces to support it 208 lots/units. When parking is calculated based on the "Parking Table" of the UDC, the Park is required to have 416 spaces. The RMH Plan shown the Park having a total of 331 parking spaces - 318 allocated to lots/units and 13 to guests. Given the Park is not proposing future expansion or substantive revisions, except when triggered by platting or future roadway improvements, and it has existed in its present form since 1977 without apparent parking issues impacting adjacent public rights of way or other properties, staff is supportive of approving a parking exception of approximately 85 parking spaces. If the property were to be redeveloped or substantially modified, full compliance with the parking standards of the UDC's "Parking Table" would be required given the standards within this table are more restrictive than those within the RMH "other standards" section.

All other contemporary requirements of the RMH district that are enumerated in Sec. 29-2.2(a)(4)(Other Standards) of the UDC are found to be met by the existing development. The subject property is served by multiple roadway accesses to both New Haven and Warren Drive which are required given the total of 208 lots/units within the Park. There have been no expressed concerns by the City's Fire Department with accessibility within or through the Park.

Utilities within the Park are provided by Boone Electric Cooperative and Public Water Supply District (PWSD) # 9. Discussion between the Columbia Water Utility and PWSD # 9 is on-going to have the Park water service transferred fully to the city once the required "fire" service line is extended into the site from the city's 16-inch watermain located along New Haven Road. Fire and police protection would transfer to the city from Boone County upon annexation with the city becoming the "primary" provider and Boone County providing mutual-aid assistance.

Conclusion

The applicant's request for RMH zoning as the site's permanent city zoning upon annexation with an RMH Park Plan is believe reasonable and appropriate. The subject 36.65-acres has operated as the Woodstock Mobile Home Park since 1977and is within Boone County's R-M zoning classification. The Park was constructed prior to the County's adoption of zoning regulations governing mobile home parks. Given no locally applicable regulatory standards influenced the development of the Park, several non-conformities with respect to currently adopted standards have been identified.

Specifically, the applicant is seeking approval of several “design exceptions” as it relates to the city’s RMH dimensional requirements as well as perimeter buffering and parking standards that would be applicable to the Park. Addressing these matters via the “design exception” process is permissible given the RMH Park Plan is considered equivalent to a PD Development Plan. The RMH Park Plan also will act as the acreage’s preliminary plat. A final plat of the Park boundary will be required given the Park is not located on a UDC defined “legal lot”.

After comprehensive review of the RMH Park Plan and the submitted lot dimension analysis, staff has concluded that while several of the existing lots/units within the Park will not comply with the minimum dimensional standards of the RMH district, this is not of significant concern. The RMH Plan will govern all future improvements and/or replacement of mobile homes within the Park the notes on the Sheet 6 of the plan provide specific “developer-imposed” restrictions that indicate no exacerbation of existing non-compliance will be permitted.

The underlying objective of submitting the RMH request and RMH Park Plan is to ensure that existing non-compliant on-site waste treatment facilities can be eliminated and future use of the acreage as a 208 lot/unit mobile home park is continued. There are minimal proposed revisions to the existing Park layout which will be driven by adjacent roadway improvements and future platting of the property. However, aside from these changes (see Sheets 2-5 of the RMH Park Plan) no further modifications to the Park will occur.

The requested rezoning to RMH and the RMH Park Plan has been evaluated for compliance with the provisions of the UDC by both internal and external staff. Approval of both the rezoning and the Park Plan is recommended subject to minor technical corrections

RECOMMENDATION

The following recommendation are made with respect to this request:

1. Approval of the proposed RMH district designation subject to Council approval of the concurrent annexation request; and
2. Approval of the submitted RMH Park Plan inclusive of the design exceptions shown thereon, subject to minor technical corrections.

ATTACHMENTS

- Locator Maps
- RMH Park Plan
- Applicant Correspondence

SITE CHARACTERISTICS

Area (acres)	36.65-acres
Topography	A ridgeline splits the acreage across the northern 1/3 of the property with grades declining from east to west. Sanitary outfall is located in SW corner of site
Vegetation/Landscaping	Mixture of mature landscaping and existing tree cover
Watershed/Drainage	Clear Creek, Grindstone Creek
Existing structures	Woodstock Mobile Home Park dwellings and accessory structures

HISTORY

Annexation date	Pending
Zoning District	Boone County R-M – proposed City RMH
Land Use Plan designation	Employment, Neighborhood, Sensitive Area
Previous Subdivision/Legal Lot Status	Survey Tract (BK 310, PG 103 & BK 368, PG 185)

UTILITIES & SERVICES

Sanitary Sewer	City of Columbia
Water	PWSD # 9
Fire Protection	Boone County; City of Columbia upon annexation
Electric	Boone Electric

ACCESS

New Haven Road	
Location	Southern boundary of site
Major Roadway Plan	Minor Arterial Variable width additional ROW required at time of final plat.
CIP projects	No City CIP; however, MoDOT reconstruction/realignment
Sidewalk	No sidewalks existing will be coordinated with MoDOT project & final plat

Warren Drive	
Location	Eastern boundary of site
Major Roadway Plan	Local, non-residential No less than 33-ft dedication at time of final plat.
CIP projects	None
Sidewalk	No sidewalks existing will be address as part of final plat

PARKS & RECREATION

Neighborhood Parks	Nifong Park
Trails Plan	N/A
Bicycle/Pedestrian Plan	N/A

PUBLIC NOTIFICATION

30 early notification postcards and public hearing notices were distributed to all property owners within 200 feet and City-recognized neighborhood associations within 1,000 feet of the boundaries of the subject property on April 28 and May 19, respectively. A public hearing ad was placed in the Columbia Daily Tribune on May 20, 2025 relating to this request.

Notified neighborhood association(s)	Lenoir Woods
Correspondence received	None

Report prepared by Patrick Zenner

Approved by Patrick Zenner