

February 21, 2024

City of Columbia, Missouri  
701 E. Broadway  
Columbia, Missouri 65201

**Re: Request for Clarification on Necessity of Annexation  
Woodstock Mobile Home Park**

The purpose of this letter is to request that the remainder of Woodstock Mobile Home Park be allowed to connect into the City's sanitary sewer collection system without having to annex it into the City. This annexation would typically be required for any property to connect to the City's sewer. However, the southern third of the park was already connected at a previous time. We believe the annexation requirement is overly burdensome because of a range of unexpected consequences related to this specific annexation. We request clarification on the necessity to annex the approximately 36 acres of land located at 3501 New Haven Road, Columbia, Missouri.

Ultimately, the park needs to make the connection to close two smaller package wastewater treatment facilities (WWTFs) located at the northwest and northeast corners of the property. The treatment plants must be closed to address potential public health concerns identified by the Missouri Department of Natural Resources as they can no longer meet the discharge limits. The new owners of the park wish to keep the park as it exists with upgrades to the internal driveways (repair and repaving) and the addition of amenities to enhance the quality of the park.

If the site is annexed to the City, the amount of survey, drafting, engineering and construction work that will be required is significant. In addition to the cost, two major impacts are: 1) this will greatly extend the time before the necessary sanitary sewer work can be completed and 2) it will greatly increase the internal disruption that the existing park residents will have to endure. This is especially significant due to the already expected disruption of the proposed MoDOT work along New Haven Road where the entrance to the park is expected to be relocated and some existing mobile homes are expected to be required to be removed/moved. The following requirements/costs will impact the viability of maintaining the park as an essential part of Columbia's affordable housing community:

- Preparation of annexation application. **Approximate Cost: \$10,000**
- If annexed, the site would come into the City zoned R-MH. This would require the preparation of an RMH development plan documenting in explicit detail all of the existing homes (sizes and locations) and other infrastructure. A thorough and detailed analysis of the site would also be required in order to document the existing nonconformities. This will require an extensive amount of field surveys and office work to develop. **Approximate Cost: \$50,000**
- The property has never been platted and a single lot minor plat will be required to make the park a legal lot. Note that the required right-of-way dedication will exacerbate some of the non-conformities (homes too close to the existing property lines) which will also affect the construction of the sidewalk (see next bullet). **Approximate Cost: \$10,000**

- The platting action triggers the requirements for sidewalk construction along New Haven Road and along Warren Drive. This would constitute the design and construction of approximately 2133' of sidewalk (or possibly a payment in lieu of given the aforementioned issue with the right-of-way dedication). **Approximate Cost: \$180,000**
- The platting action also triggers the requirement for fire protection. The existing PWSD #9 system that serves the park does not have sufficient fire flow for fire hydrants to be added. Therefore, approximately 4175' feet of waterline would have to be constructed to serve approximately 6 new fire hydrants. In order not to have dead end lines, the City and District would propose to replace the three existing District master meters for the park with three or four City master meters. There are also system equity charges and meter fees. **Approximate Cost: \$200,000**
- The platting action also triggers the requirement for a significant tree inventory. This requires field data collection, survey and drafting of the plan showing all existing trees over 20" on a site with many existing mature trees (none of which the new owners want to remove unless absolutely necessary). **Approximate Cost: \$15,000**
- The platting action will likely trigger a review of the stormwater management for the existing site but given no land disturbance is intended at this time, will not likely require any mitigation of the existing conditions. **Approximate Cost: \$10,000**
- While the platting action does not trigger the preparation of sanitary sewer plans (there is existing sewer to the property that serves approximately the southern third of the homes), the whole point of this annexation would be to install two lift stations to serve approximately 120 existing homes that are on the existing property. The connection fee for each home would be \$2400 for a total connection fee of approximately \$288,000 in addition to the cost for two lift stations and 1135 feet of sewer line. **Approximate Cost \$1,225,000**

**TOTAL ESTIMATED PROJECT COST WITH ANNEXATION: \$1,700,000**

For comparison, if a pre-annexation agreement was put in place to allow for the construction of the sanitary sewer connections without annexation until such a time as the land was redeveloped, many of these costs and a significant amount of time and disruption would be avoided while allowing the existing conditions to remain. The connection fee would be higher and the ongoing sewer service rates would be higher, but many other costs would be deferred to a later date. This option results in significantly more money going to the City versus being spent on 3<sup>rd</sup> party service providers.

- The connection fee for properties outside of the City for each home would be \$3600 for a total connection fee of approximately \$432,000 in addition to the costs for two lift stations and 1135 feet of sewer line. **Approximate Cost: \$1,369,000**

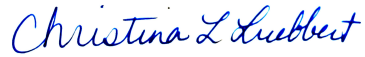
**TOTAL ESTIMATED PROJECT COST WITHOUT ANNEXATION: \$1,369,000**

In either circumstance, the improvements the new owners had hoped to make within the existing Woodstock Mobile Home Park represent a significant investment in our community. While the new property owners understand the City's reasoning for typically requiring annexation in these types of circumstances, they likewise would prefer to maintain the affordable housing that the existing park provides (especially with the vast majority of homes being owner occupied – only the land is leased). We therefore request an evaluation of this very specific situation as to the

absolute necessity of annexation as it relates to extending the existing City sanitary sewer service within the park.

Thank you for your time and consideration of this request. Please let me know if you need any additional information as you prepare your response.

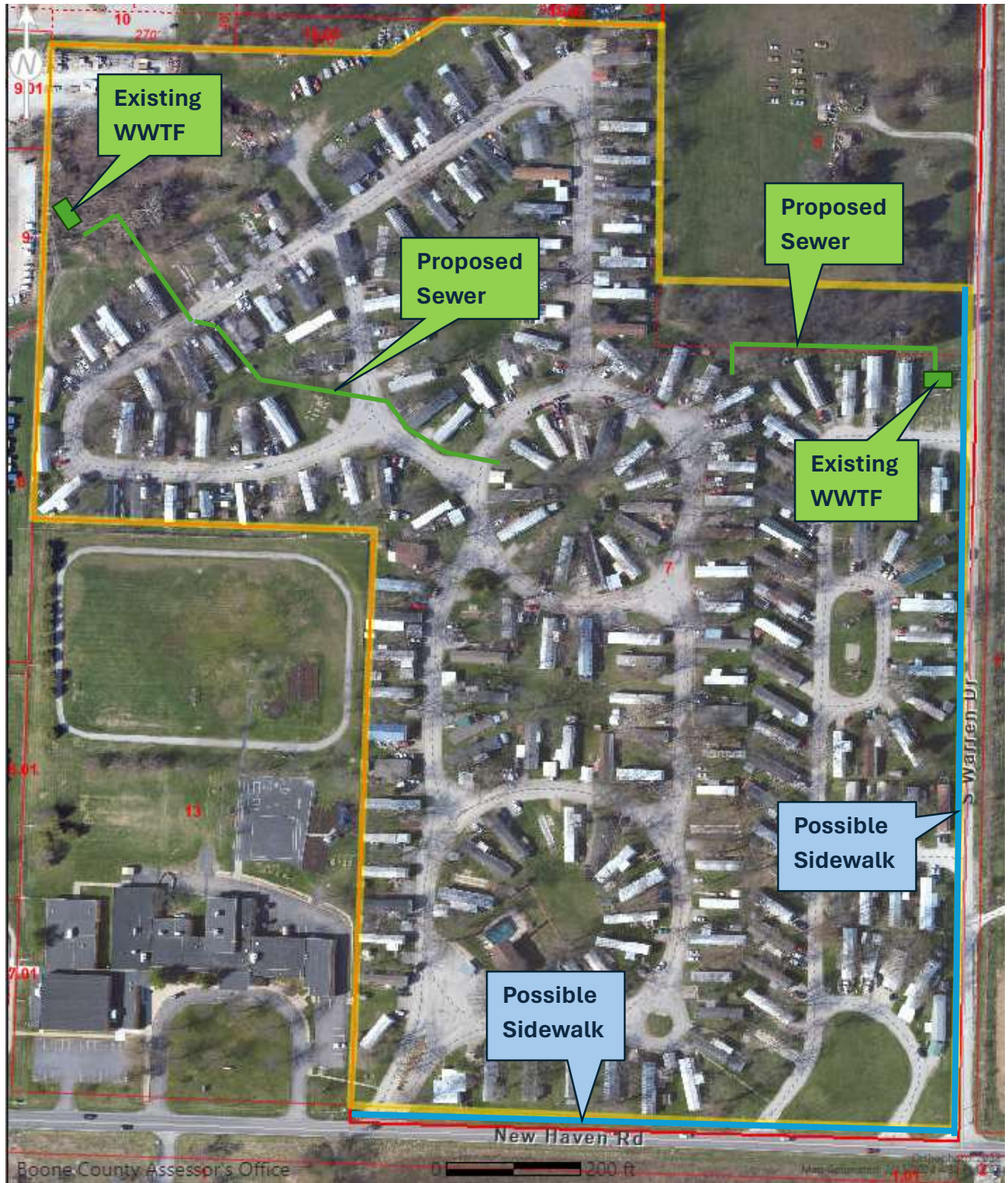
Sincerely,

A handwritten signature in blue ink that reads "Christina L. Luebbert". The script is cursive and fluid.

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

C: Connor Henwood - Woodstock MH, L.L.C.

# Woodstock Mobile Home Park

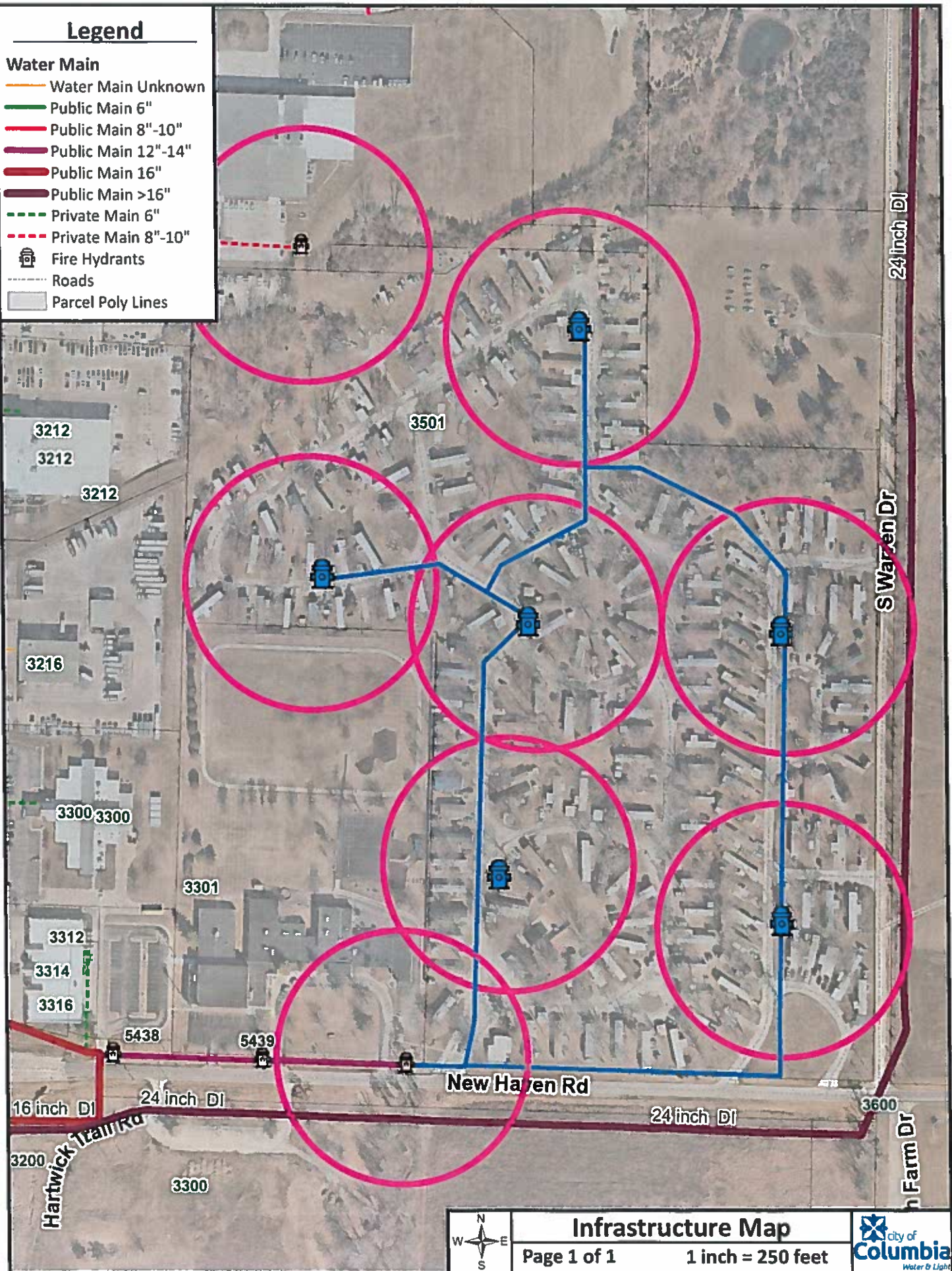




## Legend

### Water Main

- Water Main Unknown
- Public Main 6"
- Public Main 8"-10"
- Public Main 12"-14"
- Public Main 16"
- Public Main >16"
- Private Main 6"
- Private Main 8"-10"
- Fire Hydrants
- Roads
- Parcel Poly Lines



## Infrastructure Map

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1 inch = 250 feet

