

ON THE QUESTION OF OWNERSHIP

I would like to comment about ownership. Who owns the completed project is critical to how it will be operated. The application states that KEAT properties will be the owner during development. Maryville is not the owner, nor do they intend to own it. We do not know who will own the property once developed. It will likely be sold - potentially to an out-of-town investor or other owner who has little interest in maintaining the character of Town and Country. We do not know the lease arrangement with Maryville – its length, conditions, or exclusivity. Any lease can be broken. Since this dormitory is a single-use structure, what will happen if Maryville is no longer the sole tenant? Or if Maryville no longer needs it at all?

Regarding the Event Center, once again we do not know Maryville's commitment to use of this facility, but it does not appear from the available data that Maryville's use would justify the expense of such a structure. In fact, according to the data submitted utilization is only 20% based on Visitor Count. There are only six identified events per year and another twenty-four "special" events that require the 3,000 seats. We do not know what "special events" are. No other events require over one thousand seats and most less than five hundred. So, it is reasonable to assume that the new owner will seek to maximize its revenue with other events, such as concerts like what we can see at the Factory event center which is just three miles west of Woods Mill Center. It is easy to observe the impact these events have had on the surrounding area.

Taken together, a 400-student dormitory and a 3,000-person event center will place significant additional demand on our city's services, particularly police, fire, and EMS. It is not clear that the additional tax revenue will be sufficient to cover these expenses.

If approved, restrictions could be attached such as requiring a special permit for each event with over two hundred attendees or requiring parking to be "no charge" so attendees will not attempt to park in nearby "free" parking spots. However, this approach presents its own set of problems.

For these reasons as well as the many reasons presented by my neighbors, I urge you to deny the developer's application in any form whatsoever. This application should be denied based on the lack of transparency on ownership and the terms of any leases.

Respectfully submitted,
Karen Gedera
737 Kraffel Lane

4/20/2022

THE PROPOSED DEVELOPMENT CONTRADICTS THE COMPREHENSIVE PLAN GOALS AND OBJECTIVES

Sharon Rothmel, 4-20-2022

The Comprehensive Plan and City policies have always been driven by the desire to “keep the country in Town and Country.” City Code states that a Planned Non-Residential Development should implement the Plan’s recommendations. The KEAT development directly contradicts them.

In several places, the Plan states that new non-residential development shall harmonize with existing residential development. The KEAT plan instead conflicts with the residential properties to the south. The garage is only 46 feet from Cedar Springs. The main circulation drive is 20 feet away. The development will inflict noise, light pollution and excessive traffic on nearby subdivisions.

The Plan states that *Landscape buffers and setbacks should be used between non-residential and residential land uses.* Setbacks and buffers shown are inadequate and violate the Zoning Regulations.

The Plan states that new nonresidential developments should represent a scale and character compatible with the existing area and adjacent uses. The scale and character of the 3000-seat arena, 1168-space garage and 5-story dormitory are clearly not compatible with adjacent residences.

The Plan states that the City should enforce lighting and noise regulations to mitigate the impact of non-residential uses on adjacent uses. Myriad lights at the KEAT development will be visible all night long from surrounding areas. No regulations can mitigate the noise of 3000 people leaving a concert, traffic on a main circulation drive 20 feet away and 1168 cars in a parking garage 46 feet from residences.

The Plan states that special districts should be used to protect the interests of property owners and the community at large. This Special District ignores adjacent property owners and our community. It serves only KEAT.

The Plan states that existing commercial centers should be sustainable and responsive to a changing economy. This proposal, instead of one with more commercial uses, will permanently reduce the potential for this point of sale site to generate healthy sales tax revenue for the City.

The Plan states that planned development zoning should promote redevelopment of commercial centers when public benefits are provided. The KEAT plan has no public benefit: no parks, little green space, limited restaurant use, and a negative impact on surrounding areas. It serves only KEAT.

The Plan states that developments should promote a safe and efficient transportation network to better accommodate automobile, pedestrian, and bicycle traffic. This proposal will only burden the vicinity with increased traffic.

The Woods Mill Center Focus Area Plan states that hotel w/restaurant, office and medical office and local neighborhood retail are appropriate for Woods Mill Center – not massive event centers, dormitories, student dining and a large above grade garage.

The KEAT development disregards all of these Comprehensive Plan recommendations. Please follow the rules and do the right thing: turn this down.

To: Planning & Zoning Commission

From: Sharon Rothmel

Re: THE PROPOSED KEAT DEVELOPMENT CONTRADICTS THE 2020 COMPREHENSIVE PLAN GOALS AND OBJECTIVES

The Comprehensive Plan and City policies have always been driven by the desire to “keep the country in Town and Country.” The Comprehensive Plan guides the City towards that goal. In fact, City Code states that a Planned Non-Residential Development should facilitate the implementation of the recommendations of the adopted Comprehensive Plan. This proposed development not only does not further the Comprehensive Plan Goals and Objectives, it directly contradicts them.

GOAL 2.2: New non-residential development shall be in harmony with existing residential development. This proposal grossly and directly conflicts with the residentially zoned and developed properties to the south. The garage is only 46 feet from Cedar Springs, with the main circulation drive 20 feet away. The development will inflict noise, light pollution and excessive traffic on nearby subdivisions, with little mitigation.

OBJECTIVE 2.2.1 Create a policy which clearly outlines the use of trails, landscape buffers, and setbacks between non-residential and residential land use types. The setbacks and bufferyards are not sufficient and clearly violate the requirements of the Zoning Regulations

OBJECTIVE 2.2.2 Review the policies of the architectural review board to ensure that new development, renovations, and additions for nonresidential uses represent a scale and character that are compatible with the existing area and adjacent uses. No policies can change the scale and character of the proposed arena, parking garage and dormitory development such that it is compatible with the existing area and adjacent residential and nonresidential uses.

OBJECTIVE 2.2.3 Review existing ordinances and enforce lighting and noise regulations to mitigate the impact of non-residential land uses on adjacent uses as appropriate. The proposed buildings will require a lot of lighting, visible easily all night long from surrounding areas. No noise regulations can mitigate the noise of 3000 people leaving a concert, or of traffic on a main circulation drive 20 feet away, and of 1168 cars in a parking garage 46 feet from residences.

OBJECTIVE 2.4.2 Continue to utilize special districts to promote site specific zoning that protects the interests of property owners and the community at large. This proposed PNR District violates the interests of adjacent property owners and does not further the interest of the City of Town and Country residents. It serves only the developer and prospective tenants.

GOAL 4.3: Ensure that existing commercial centers are sustainable and responsive to a changing economy. This existing commercial center is clearly in need of redevelopment. The proposed development does not ensure its sustainability. Rather, it restricts the flexibility of this prime

commercial site. Approving this proposal will permanently remove the potential for the site to generate healthy sales tax revenue for the City.

OBJECTIVE 4.3.4 Consider the use of planned development zoning to promote redevelopment of commercial centers when public benefits are provided. This redevelopment plan has no public benefit: no parks, little green space, unspecified but limited restaurant use, and a negative impact on surrounding areas. It serves only the interests of KEAT.

GOAL 7.1: Promote a safe and efficient transportation network that balances the character of existing roadways. OBJECTIVE 7.1.1 Review and update the 141 Corridor Enhancement Study (1998), which includes the stretch of 141 starting at Woods Mill Center and Highway 64/40 to Lamp and Lantern, at Clayton and 141 to better accommodate automobile, pedestrian, and bicycle traffic circulation issues. No plans have been submitted that demonstrate these goals and objectives. Instead, KEAT's plan will burden existing residences and offices with increased traffic.

KEY TAKEAWAYS-LAND USE GOALS: While flexibility in the development of non-residential construction is encouraged, it should be harmonious with existing residential subdivisions. The proposed development is not harmonious with existing residential subdivisions in any way.

WOODS MILL CENTER FOCUS AREA PLAN FUTURE LAND USE RECOMMENDATIONS. The Plan states:

Should the site be redeveloped the following Future Land Uses would be considered appropriate for the site:

- Hotel w/restaurant
- Office
- Medical Office
- Local, neighborhood retail

Any private Developer/Business should help fund traffic improvements. Redevelopment should promote a unified, campus-oriented design. The architecture of the structures and streetscaping should be unified and applied in a comprehensive manner. Further the site should be well landscaped and buffered with particular attention to adjacent residential subdivisions.

Dormitories, multi-story garages, and massive event centers are not included. There is no attention to neighboring subdivisions – they will only be negatively impacted. The drawings do not show architecture representing a unified, campus-oriented design. Bufferyards are inadequate.

Once again, the KEAT development clearly conflicts with the recommendations of the Comprehensive Plan. It should not be approved.

To the Planning & Zoning Commission:

My name is Steve Rothmel. I live at 725 Kraffel Lane in the Manderleigh subdivision. I'm in favor of redeveloping the Woods Mill Center. However, I'm shocked and disappointed that the City of Town and Country is seriously considering the KEAT plan for this property.

If the KEAT proposal that you are considering for the Woods Mill property is approved, nearly two hundred and fifty Town and Country homeowners who live in Manderleigh and Cedar Springs subdivisions will be negatively impacted by this massive development. The proposed 5 story dormitory with 400 college students, an event center for thousands of visitors and a garage with limited parking, are the ingredients for a permanent headache for the city and nearby residents.

I know that my neighbors share my real concern about safety in our neighborhoods, not only from increased traffic, but also from introducing thousands of strangers who have no stake in or concern for our neighborhoods and our city.

If Maryville needs more dormitory and event space, the university should build it on the abundant vacant property on their campus, where they have their own public safety officers and can enforce their own rules. Instead, this development would put the onus and the expense on Town and Country to police it and deal with any problems and emergencies.

I have been a professor at two large universities, I am especially concerned about the prevalence of excessive drinking and drug overdoses that are common on all college campuses today. And we all see reports about unruly and potentially dangerous behavior at concerts. We don't want these kinds of problems spilling over into our neighborhood.

There's no benefit to Town and Country residents. The only benefit is for the developer, KEAT. The KEAT development would not be a good neighbor.

The Town & Country 2020 Vision Statement describes Town and Country as a "vibrant and engaged community recognized regionally for its quiet and peaceful neighborhoods". If you approve the KEAT development plan, you will undermine this vision and betray the Manderleigh and Cedar Springs homeowners.

Theodore W. Hellman
14236 Manderleigh Woods Drive
Town and Country, Missouri 63017

Presentation to Town and Country Planning and Zoning Commission April 20, 2022.

A group of concerned residents formed an association on December 4, 2021, a few days after attending Keat's presentation to some but not all stakeholders in the area impacted. I was asked to chair the Association.

The purpose of our Association is to advocate for the appropriate development of Woods Mill Center. To be clear, our Association recognizes the need to redevelop Woods Mill Center and supports the APPROPRIATE redevelopment of Woods Mill Center.

During the past sixteen weeks I have interacted with City of Town and Country officials including the Mayor, current aldermen, former aldermen, a former administrator, developers, an architect, a civil engineer, the President of Gershman, the President of Maryville, a Maryville board member and MOST IMPORTANTLY dozens of Manderleigh and Cedar Springs residents.

Sixteen weeks of very thorough research by our association (much of which you just heard) has led our association to conclude without any reservation that the Keat/Keeley/Maryville proposal is not appropriate and will be detrimental to our neighborhood.

So where do we go from here? We believe that the City of Town and Country needs a commission, a committee or some mechanism to PROACTIVELY reach out to the developer community to request proposals for the redevelopment of Woods Mill Center. This will produce competing proposals from which we can choose the most appropriate proposal.

Unfortunately, this has not happened, but it can still happen. One alderman stated at a recent meeting of residents that the City cannot afford such a commission or committee.

I found that to be disingenuous and a smoke screen. I pointed out to the alderman and our neighbors that I am willing to offer my experience in development, to lead such an effort and to serve totally pro bono. In my research I have identified several highly qualified residents who are also willing to serve. This is our gift to the City and most importantly to our neighbors.

The Mayor is aware of my offer. I have confirmed my commitment to the Mayor in writing, and I am confirming my commitment to you in writing this evening.

I am in the process of creating a business plan that starts with identifying what the City needs, (for example sales tax revenue) what our neighbors would like to see in Woods Mill Center (for example restaurants, retail shops, amenities and green space) and importantly what the owner is seeking (sale of the property). I already have a input that is a good start.

I am eager to get started. By the way this does not preclude Mr. Yawitz and Keat/Keeley. We welcome him to submit a new proposal that meets the City's needs, our neighbors' needs and the owners' needs.

We also need to address the type of overreach in the Keat/Keeley/Maryville proposal for the future.

To that end, I have drafted a City of Town and Country Ordinance that addresses the location of student housing, and I am in the process of drafting a City of Town and Country Ordinance that addresses the size and capacity of entertainment venues. I will be working with my aldermen to submit these proposed ordinances to the Board of Aldermen.

Submitted by Ted Hellman on April, 20, 2022.