

November 23, 2016

City of Lake Elmo
Planning and Zoning Department
Stephen Wensman, Planning Director
3800 Laverne Avenue North
Lake Elmo, Minnesota 55042

Dear Mr. Wensman:

On behalf of The Homestead Homeowner's Association, I would like to submit the following comments related to the EAW for the proposed Royal Golf Residential Development project:

- 1) The list of Permits and Approvals Required on Page 5 indicates that a Comprehensive Plan Amendment has been submitted to the Metropolitan Council. We believe this is inaccurate since the City Council has not voted to amend its current Comprehensive Plan to allow any kind of residential development on this property.
- 2) The Traffic Impact Analysis was based on data collected in July, 2016. We are concerned that this data may significantly under-represent the normal "baseline" traffic volume for the following reasons:
 - A significant portion of Lake Elmo Avenue N was closed during this time due to construction on Lake Elmo Ave and in the Old Village area.
 - Local schools were not in session due to the Summer break.
 - The Tartan Park golf course was not operational during this time. The developer has indicated that they expect 30,000 – 45,000 rounds of golf annually which will generate additional traffic volume that may not have been fully reflected in the analysis.
- 3) We've heard recently that the City Council might opt to schedule a vote on a proposed Comprehensive Plan amendment for this land at the upcoming December 6th Council meeting. We feel that a vote on December 6th would not allow enough time for a thorough review and consideration of the public comments related to this EAW. Our understanding is that it is common practice by RGU's to not take any legislative action on their comprehensive plan amendments for the area under consideration prior to the completion and public review of an EAW or EIS and official action on the pending EAW or EIS.
- 4) We would like to raise the question of whether an EIS might be required or simply be prudent for this development. As you undoubtedly know, MN Rule 4410.4400 Subp.14 defines a set of residential housing unit thresholds which trigger the need for a mandatory EIS based on "the total number of units that the proposer may ultimately develop on all contiguous land owned by the proposer or for which the proposer has an option to purchase." Unless the developer is willing to put the golf course acreage into a conservation easement in perpetuity, the total

number of housing units which could eventually be built on this entire 477-acre parcel may very well eventually exceed the thresholds defined in this rule. Our understanding is that a development with the potential for "400 unattached units or 600 attached units ... if the project is not consistent with the adopted comprehensive plan" would require a mandatory EIS.

Although our neighborhood continues to be amenable to this proposed development in concept, we remain disappointed with the proposed 292-unit housing density and we have concerns about the potential for several hundred additional homes should the golf course someday become financially unsustainable. Given the unique location and exceptional attributes of this property, coupled with the widely held local desire to preserve and protect the rural character of Lake Elmo, we feel that 'Open Space' housing densities similar to those in our neighborhood would be far preferable and more appropriate for this development.

Thank you for your continued leadership in managing this important process on behalf of our City.

Kindly

A handwritten signature in black ink, appearing to read "Dan Rice". The signature is fluid and cursive, with a large initial "D" and "R".

Dan Rice, President

Homestead Homeowners Association

11364 14th St N

Lake Elmo, MN 55042