

Letter to the City Council

From: Citizens for Star

April 21, 2023

Subject: Response to Willowbrook's narrative statements

Dear Mayor Chadwick, Councilman Hershey, Councilman Wheelock, Councilwoman Salmonsens, Councilman Nielsen,

We have been asked by the city council to ensure that our points are truthful, factual, and accurate when discussing our issues and concerns with the Willowbrook proposal. Upon review of Willowbrook's updated application narrative, the applicant made many claims without any factual data to back up these claims. We ask that the city council hold Willowbrook to the same standards that you have requested the public adhere to in addressing the City Council.

Here is a list of statements made from the narrative that we find highly inaccurate.

- The applicant stated in his application materials "The housing variety will be aligned to be compatible with surrounding residential development."
 - This statement is not true.
 - The applicant is proposing a mix of lot sizes ranging from 3,600 square feet to one acre with a majority of the lots being between 3,600 square feet and 12,000 square feet in size. This is not at all compatible with the area and the existing homes which are approximately 20 years old. The existing area is a minimum of 1 acre lots up to 10 acre lots. If the development is to be compatible with the existing development the lots sizes should be a minimum of one acre in size. This would be "compatible with the surrounding residential area".
 - Additionally, if you look at the typical lot sizes and housing types the applicant provided, most look nothing like what is existing in the Hillsdale Estates and Monument Ridge developments. **The net density of 3.48 du/a is not compatible with the existing neighborhood.**
- The applicant also states "Thirty-one acres of buffer parkways and grassy areas"
 - What exactly is provided within these areas? The proposed lots will be much smaller than the existing lots and will need active recreation areas. Where are the proposed parks? How will Hillsdale's private open space be protected from neighbors who do not pay for the maintenance of these amenities?
- The applicant states "all within a beautifully landscaped and highly amenitized development, connected with bike and pedestrian pathways."
 - However, the application provides little to no details on amenities. Trails only seem to be provided where the terrain is too steep to build on with no connectivity throughout the neighborhood. What and where are the amenities?

- The applicant states that the golf course will be “the focal point of the Willowbrook community”
 - If you look at the conceptual master plan, you will see most of the golf course will be surrounded by very small lot homes, which do not blend with the existing rural neighborhood. The new residents in these homes will be the only ones to actually see the course.

- The project description letter requests: “The golf facilities are requested to be approved as part of the Development Agreement in lieu of a conditional use permit.”
 - We strongly disagree with this request. No preliminary plans of the proposal have been provided and there is little to no information in the DA regarding the golf course, how it will be run and what will happen in the future if for some reason the course fails. All of this should be reviewed as part of a Conditional Use Permit where specific conditions would be put on the project. There is not a reason to make an exception to the Code.

- “Willowbrook’s Conceptual Master Plan includes approximately 110,000 SF of neighborhood commercial space to eventually include convenient services and retail opportunities for area residents and visitors.”
 - The existing neighborhood is rural residential with large lots, hobby farms, livestock, etc. Commercial development is not compatible with the existing neighborhoods. There are few details on the proposed development and the impacts to the neighborhood.

- “The planned future commercial uses will not occur until and unless approved as part of the future preliminary plat and PUD applications.”
 - However, the applicant is requesting the land be annexed and zoned at this time without a thorough review of the impacts these uses will have on the existing neighborhood in the future. More information is needed before this application can be approved.

- “Willowbrook’s Conceptual Master Plan includes land for civic uses, including sewer, fire/police/EMS services, that will provide improved safety and services for all adjacent residents.”
 - This claim is made without any details of what type of uses, where they will be located and how they might impact the neighboring existing residences.

- Access/ Roads – “Primary access to Willowbrook is planned at Can Ada Road on the West, with a residential collector and spine road running east-west, and additional points of access at Wing Road and W. Deep Canyon Drive. In later phases, a future road extension is planned to connect to a new Highway 16 access northeast of the site. Public and private roads will provide residents with circulation throughout the development. A

traffic impact study and associated review by ITD and ACHD will be required with the Preliminary Plat application.”

- Very few details have been provided on traffic. A TIS was completed, and this project will have major impacts to the existing rural roads within the existing neighborhoods. There is no discussion on how these impacts will be mitigated and no real solutions to the traffic issues. Nothing should be approved until the traffic impacts and mitigations are fully understood and acceptable to ACHD.
- Open Space and Amenities – “The featured amenity in Willowbrook is the 175-acre, 18-hole championship golf course, which includes a driving range and clubhouse amenities, and this will be provided as the first phase of the development, providing immediate public benefit.”
 - A golf course might be an amenity to some, but it is not Open Space. This golf course is a commercial use and it will be there for the residents to pay for and enjoy if they choose to spend their money there (like any other commercial use). The course will be privately owned and not a municipal course, so there is no public benefit where the City might own, maintain and offer green fees at a reduced rate. A public benefit does not exist.
- “Willowbrook meets all of the requirements for annexation and zoning. First, annexation and zoning to R-2 complies with applicable provisions of the Star Comprehensive Plan.”
 - The site is designated Low Density Residential (Maximum 1) unit per acre per the Star Comprehensive Plan Land Use Map. Compatible zoning designations for this land use are RR (rural residential) and R-1 per the municipal code. R-2 is not compatible.
- “The Project also includes a mix of commercial and residential development within a planned community that encourages walkability, addressing Implementation Policies 7.5(A) and (E).”
 - There is nothing in this application that discusses “encouraging walkability”. The project is isolated in the most northern part of the city (if annexed) far away from services. There is no comprehensive plan for trails and pedestrian connectivity.
- “This Project will provide needed housing and appropriate commercial development adjacent to that housing in an area with similar uses.”
 - There is nothing similar about the existing rural residential neighborhood and the dense suburban uses. As the applicant stated earlier in their application letter, they have not identified the commercial uses, so how do they know they are appropriate and similar. There are currently no commercial developments in the area, which is expected and consistent for rural residential development.

- “The master planned nature of the community – with the golf course, employment opportunities, access to services, and significant connecting pedestrian and bike pathways – will provide internal trip capture opportunities, minimizing external impacts on roads and maximizing quality of life. The commercial uses will benefit the City and all City residents with increased tax base and opportunities to access quality goods and services.”
 - There are no “significant connecting pedestrian and bike paths” proposed. The best possible commercial development would be a strip mall, not livable wage jobs. There is no possible way for the applicant to back up the claim that this project “will provide internal trip capture opportunities” from the very conceptual plans provided. The TIS has shown the huge impacts to the roadway system. This claim is simply not accurate.

- “All conditional use permit criteria in Star City Code are met.”
 - As required by the Municipal code this application needs to go through the required CUP process. There is nothing that warrants an exception.

- “The design, construction, operation and maintenance of the golf course uses will be compatible with the surrounding uses, and with the existing or intended character of the vicinity. The architecture will conform to and/or complement surrounding development, and the golf course uses are compatible with adjacent residential and recreational uses.”
 - The applicant has not provided enough detail to determine if the course is compatible with the existing neighboring rural residential development. No architecture, detailed site plan, or a detailed description of the operation has been provided. All these things need to be provided to determine compatibility and the need for conditions of approval, if approval is warranted.

- “The Willowbrook golf course and facilities will not adversely affect properties in the vicinity. The Project will enhance the property and aesthetic values of adjacent properties with beautiful and functional amenities and related services for area residents.”
 - There is nothing to back up this claim. There are no details to the proposal to determine if the proposed golf course would adversely affect properties in the vicinity.

- “The proposed golf course uses will not constitute nuisance activities of any kind.”
 - Again, no detailed description of the operation has been provided to determine if the use will constitute a nuisance. More information is required.

The site should not be annexed or rezoned until more information is provided and impacts and mitigations are determined. The project needs to comply with the Comprehensive Plan and ensure compatible one acre lots are developed. Traffic impacts must be addressed. A

Conditional Use Permit needs to be applied for to develop the golf course so the impacts can be reviewed and addressed.

Thank you,

The Citizens for Star organization

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