

Good Evening.

My name is **Rachelle Vandiver**, and I serve as the General Manager of the Raintree Lake Property Owners Association, located at 825 SW Raintree Drive in Lee's Summit, Missouri.

I appear before you this evening not to oppose development, but to advocate for **responsible growth**—growth that supports strong, livable neighborhoods and protects the natural resources that define our community. Our priority is ensuring that Lee's Summit remains a place where current and future residents can enjoy safe, vibrant neighborhoods and diverse housing options.

According to the City's **Strong Neighborhoods & Housing Choice** initiative, our community supports:

- Friendly, welcoming, community-minded neighborhoods
- Preservation and protection of existing housing
- Neighborhood character that is both charming and elevated
- Support for residents to age in place
- Availability of affordable and diversified housing

The City's **Development Guide** provides the vision for growth and emphasizes the preservation of Lee's Summit's high-value natural resources—parks, open space, wooded areas, streams, lakes, and rivers. At Raintree Lake, we take this mission seriously. Our lake is not only a whole-body recreational water source but also a critical ecological and community asset.

The City's **Sustainable Environment Goals**—protecting the natural environment, preserving air and water quality, reducing land pollution, and mitigating climate impacts—directly relate to our watershed concerns.

In September 2023, Raintree Lake submitted a **Storm Water Engineering Study** detailing long-standing issues with the sediment basin in Raintree Lake Village. We continue to see increased storm-water volume and velocity that undercut banks and erode private property. The basin remains impaired and full of silt, and Sunset Cove's water quality continues to decline.

Now, with two additional developments—including **Arborwalk East**—converting pervious land into rooftops and parking areas **without adequate water detention**, the threat to Sunset Cove is increasing. There is no current plan for downstream silt management, and the existing sediment basin is already at capacity. Additionally, the proposed dog park poses a direct risk of increasing **E. coli contamination**, further jeopardizing the safety of our recreational water.

A new storm-water detention basin is necessary to:

- Reduce water velocity
- Capture pollutants
- Reduce runoff volume
- Protect downstream property and property values

Two additional issues also warrant clarification:

1. **Arborwalk Apartment Design:**

The original approved plan for the Manor Homes of Arborwalk called for mansion-style apartments with individual garages—324 units and 432 parking spaces, exceeding ordinance requirements by 157 spaces. According to a presentation by Mr. Gale, this design was specifically intended to avoid the appearance of a conventional apartment complex. What has changed to justify the shift to a higher-density complex?

2. **Ward Sediment Basin Maintenance:**

It was previously suggested that a maintenance agreement exists for the Ward Sediment Basin. The current property owner disputes this. How can new developments legally discharge storm water into a basin on private property without a formal, enforceable maintenance agreement?

In summary, we respectfully ask the Council to:

- Protect our watershed with the addition of necessary storm-water detention basins
- Address water quality issues affecting public health and recreational use
- Clarify changes to development plans and enforce sediment-control responsibilities
- Ensure traffic assessments reflect current and planned infrastructure improvements
- Uphold the City's values of responsible growth and environmental preservation

Thank you for your time and thoughtful consideration. We look forward to working collaboratively to protect the beauty, safety, and long-term value of our neighborhoods.

Sincerely,

Rachelle Vandiver

General Manager

Raintree Lake Property Owners Association

825 SW Raintree Drive

Lee's Summit, MO

After months of site investigation and due diligence, we have determined that we cannot deliver this multi-family community without public incentives. Unexpected, extraordinary costs that the project will now have to address include:

- Additional stormwater improvements related to existing conditions downstream;
- Geopiering in response to our discovery of undocumented fill;
- Relocation of an existing sanitary sewer line bisecting the site; and the fact that
- Financing costs have dramatically increased and the expected relief from high construction costs has not materialized.

None of these costs were anticipated when we executed our land contract last year.

During the course of our due diligence, we have also studied the County's valuation history for new multi-family communities in recent years. The steep increases and inconsistency in valuations have given us significant concerns. We cannot afford to face this level of uncertainty about property tax levels when making a more than \$70 million investment – the financial risk is too severe.

Even with all of these challenges, we still want to find a way to build one of our communities on your property in Lee's Summit. We intend to submit a request to the City for Chapter 100 incentives, including sales tax exemption on construction and a predictable 10-year PILOT, to allow this project to move forward.

We look forward to working with you and the City on this request.

Kind Regards,

A handwritten signature in cursive script, reading "Devon Coffey".

Devon Coffey
Milhaus Development

Insight

The City Lee's Summit's water quality management is regulated through its National Pollutant Discharge Elimination System (NPDES) MS4 permit issued by MDNR. As a requirement of that permit, the City developed a Stormwater Management Plan that addresses potential water quality concerns within the City because of both City operations and private activities. Currently, the City is not experiencing any significant water quality issues, though sediment is an ongoing concern.

Impaired Water Bodies

WATER BODY	YEAR	SIZE	IMPAIRED WATER USE	POLLUTANT	SOURCE	TMDL PRIORITY, SCHEDULE
LONGVIEW LAKE	2002	953 ACRES	HUMAN HEALTH PROTECTION	MERCURY IN FISH	ATMOSPHERIC DEPOSITION	LOW; > 10 YEARS
RAINTREE LAKE	2020 (PROPOSED)	240 ACRES	PROTECTION OF WARM WATER AQUATIC LIFE	CHLOROPHYLL A	NONPOINT SOURCE	LOW; > 10 YEARS
JOHN KNOX LAKE	2016	3 ACRES	HUMAN HEALTH PROTECTION	MERCURY IN FISH	ATMOSPHERIC DEPOSITION	LOW; > 10 YEARS
LITTLE BLUE RIVER	2018	35 MILES	SECONDARY CONTACT RECREATION	E. COLI	URBAN RUNOFF/ STORM SEWERS	HIGH; 2004

Big Creek was assigned a Total Maximum Daily Load (TMDL) of pollutants by the MDNR who ruled in 2017 that "No Additional Controls Demonstration" was needed.

Exotic zebra mussels are invasive in lakes, rivers, and streams

Source: Missouri Department of Natural Resources

Trends & Foresight

Lee's Summit faces several water quality challenges including continued development and management options. As Lee's Summit continues to grow, the development will increase causing the increase of impervious surfaces and a corresponding increase in the quantity of stormwater runoff to receiving waterways. Further, construction can also negatively impact water quality. When construction sites are poorly managed or lack well-maintained erosion controls, litter and sediment from the site can be washed away by rain, clogging storm inlets and polluting waterways. Compounding the matter, climate change is projected to increase the intensity and frequency of storms, exacerbating the impacts of stormwater runoff and increasing the amount of toxic blue-green algal blooms in our lakes.

Stormwater quantity controls and water quality facilities, such as retention facilities, detention ponds, wetlands, rain gardens, and bioswales, can reduce the impacts of stormwater runoff quantities and water quality. However, long-term maintenance is challenging given resource constraints and siting of some on private property, thus reducing their effectiveness to reduce pollutants. A Stormwater Master Plan is underway. The absence of a city stormwater utility to guide the long-term system, maintenance, and improvements, including water quality facilities, creates a continuous challenge for stormwater management and overall water quality. Additionally, the city may seek to increase regional participation in water quality management efforts as many waterways overlap or adjacent to neighboring jurisdictions.



Raintree Lake

Assessment Unit ID: MO_7213.00

Waterbody Condition: [Impaired \(Issues Identified\)](#)

Existing Plans for Restoration: No

[303\(d\) Listed:](#) Yes

Year Reported: 2022

[303\(d\) List Status:](#) EPA Final Action

Other Years Reported: [2018](#), [2020](#) (opens new browser tab)

Organization Name (ID): Missouri (MDNR)

What type of water is this?

Reservoir (248.1 Acres)

Where is this water located?

Legal US: ; Legal DS: 06,46N,31W

[Advanced Filtering](#)

(opens new browser tab)

Download Waterbody Data (2022)



Assessment Information from 2022

State or Tribal Nation specific designated uses:

Information on Water Quality Standards Expand All

Boating and Canoeing Insufficient Info

Human Health Protection (Fish Consumption and Secondary Contact Recreation) Insufficient Info

Irrigation Insufficient Info

Livestock and Wildlife Watering Insufficient Info

Protection of Warm Water Aquatic Life and Human Health--Fish Consumption Impaired

Identified Issues for Use

Impaired Parameters Plan in Place

Chlorophyll a No

Other Water Quality Parameters Evaluated

No other parameters evaluated for this use.

Unclassified With Other Protection Insufficient Info

Whole Body Contact Recreation Insufficient Info

Probable sources contributing to impairment from 2022:

Click a column heading to sort... Clear Filters

Source	Parameter	Confirmed
Filter...	Filter...	Filter...
Non-Point Source	Chlorophyll a	No