

EXHIBIT C



Planning & Development Division
Planning & Economic Development Department

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To: City Council
From: Jenn Moses, Manager of Planning and Community Development
Date: October 29, 2025
Subject: Land Use Conveyance Conformance with Comprehensive Plan,
Lester Park Golf Course

The Lester Park Golf Course property is a 268-acre site that was previously a city owned and operated golf course. In 2021, the City of Duluth conveyed approximately 37.5 acres of the property to the Duluth Economic Development Authority (DEDA) for development purposes. The remainder of the property, an approximately 230 acre parcel, remains city owned. Due to the limited capacity and challenges related to maintaining open space and the unique nature and development potential of the site, the City is considering conveyance of this site for future development opportunities.

The City intends to convey the remaining property at the Lester Park Golf Course to DEDA, which will prepare the property and conduct the public sale process. DEDA, an authority of the city of Duluth, is best equipped to complete pre-development activities (e.g., plans, surveys, etc.) and has the expertise and resources to effectively navigate these processes efficiently. After conveyance to DEDA, and leading up to a public sale, additional public processes and decisions will be required of Planning Commission and City Council.

The property's future use is designated as Open Space under the Duluth 2035 Comprehensive Land Use Plan; this comprehensive plan was completed in 2018, however, and has not been updated to reflect the closure of the golf course. The Duluth 2035 Comprehensive Land Use Plan also recognizes that current and future land use designations are based on "current realities of time and circumstance" and should be expected to change. The deliberate, community-focused proposal for Lester Park Golf Course is consistent with the methods and guidance set forth in comprehensive plan for the evaluation of new ideas, which encourages the exploration of transformative opportunities by technical experts, community stakeholders, and the City's planning commission and council. See *Imagine Duluth 2035*, TO-19.

Development opportunities at the site will support the following governing principles of the comprehensive land use plan:

- Principle #1: Reuse of previously developed lands - directs new investment to sites which have the potential to perform at a higher level than their current state.
- Principle #3 and Principle #4: Support existing economic base and support economic growth sectors – this includes needs for existing employers to have housing for employees.

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- Principle #8: Encourage mix of activities, uses, and densities – in particular, a variety of housing types and income levels, with neighborhood amenities and open space in close proximity.

Taken together, the 14 governing principles of Imagine Duluth 2035 as well as the policies and procedures in each chapter support a balanced community, with a mix of preserved open space, compact neighborhoods that maximize the investment in infrastructure, and support for economic development.

In order to support this vision for a balanced community, DEDA, in conjunction with City Planning staff, will undertake a land use study to assess specific types and locations for development. This study is necessary in order to determine appropriate recommendations for changes to the Future Land Use map. The final study will be brought to Planning Commission and City Council for approval.

After reviewing the proposal, including the process for the land use study, and comparing it to Imagine Duluth 2035, the comprehensive plan, in particular its governing principles and recommendations for the future of Duluth, the City's planning agency determines that this proposal is in conformance with the comprehensive plan.