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Susan B. Speckert, J.D.

December 10, 2018

Dear Chairman Wilson and Members of the Planning Commission,

Please accept this letter on behalf of Fayette Alliance with respect to the draft of the 2018 Comprehensive Plan, *Imagine Lexington*.

Founded in 2006, Fayette Alliance is a coalition of citizens dedicated to achieving sustainable growth in Lexington-Fayette County through land use advocacy, education, and promotion. Fayette Alliance believes that preserving our unique and productive Bluegrass farmland, advancing innovative development, and improving our infrastructure are essential to our collective success in Lexington.

With the adoption of the 2018 Goals & Objectives, the city of Lexington made clear its continued commitment to smart growth. Maintaining the current Urban Services Boundary (USB) and Rural Activity Centers (RACs) is the key to meeting our future growth needs responsibly and intentionally. The Goals & Objectives are responsive to the desires of the community and lay out a vision that is innovative, responsible, sustainable, and achievable.

The policies designed to implement the vision laid out in the Goals & Objectives comprehensively address the fundamental growth issues facing our community. Housing, design guidelines, corridor redevelopment, parks and greenspaces, environmental stewardship, farmland preservation, economic development, and transportation are some of the critical issues prioritized in *Imagine Lexington*. Fayette Alliance supports the majority of the recommendations in the Draft, as the policies and strategies contained therein employ innovative, smart, tested planning principals that take a long view, and directly address the implications of our changing demographic, economic, and transportation landscapes.

We appreciate having been part of the process and do have some recommendations for your consideration. We believe in the intent of *Imagine Lexington* and are committed to ensuring its success.

The Planning Staff has worked tirelessly throughout the process. More objective research and public input has



informed this Comprehensive Plan than any other. Our community is fortunate to be served by such talented and devoted professionals. Likewise, we applaud the Planning Commission for its hard work and commitment to the long-range success of our community.

Housing

Fayette Alliance was proud to partner with other stakeholders and the Lexington-Fayette Urban County Government to commission a housing market demand study as part of the 2018 Comprehensive Plan update. The consultants who completed the housing study presented their findings to the Council on August 15, 2017. When asked by a Councilmember for the biggest takeaway from the study, the consultants responded: “You need to change significantly to a much more diverse housing product.”¹

A diverse housing stock increases affordability and ensures we are able to meet the housing needs of our largest growing demographics—seniors and twenty-somethings—as well as for working families and low-income citizens. In recognition of this need, the Goals & Objectives include expanding housing choices.²

While the community made clear its support of this goal in a general sense, we have not had a community-wide discussion about how to implement it in a comprehensive way. Other communities that have tackled this issue have worked together to create housing policies that contain goals, strategies for meeting those goals, and metrics to measure progress.³ The process of citizen engagement and education on this issue is as important as the creation of the policy itself. We recommend undertaking a process to create a comprehensive housing policy that would build on the Housing Demand Study and the Affordable Housing Study completed in 2014.

Corridors and Transportation

Studies completed as part of the 2018 Comprehensive Plan process demonstrated that our corridors are vastly underutilized.⁴ A primary recommendation of *Imagine Lexington* is corridor redevelopment. Enabling redevelopment opportunities for landowners along our major corridors sets the stage for transportation improvements and protects existing neighborhoods from development that may not be compatible. Fayette Alliance strongly supports this recommendation.

However, the character, design, and functionality of our major corridors are not the same. A redevelopment project that is suitable on Nicholasville Road may

¹ James E. Hartling, Urban Partners, Presentation of Fayette County Housing Demand Study before the Lexington-Fayette Urban County Council, August 15, 2017.

² Theme A, Goal 1, 2018 *Comprehensive Plan Goals & Objectives*, adopted November 16, 2017.

³ See e.g., *Housing Boulder (Comprehensive Housing Strategy)*, <https://bouldercolorado.gov/city-council/comprehensive-housing-strategy-housing-boulder>.

⁴ *Underutilized Property Survey*, Lord Aeck Sargent, March 2017.

not be suitable on Tates Creek or Versailles. While we understand the Comprehensive Plan articulates broad policies, we do recommend recognition of the distinctiveness among Lexington's major corridors.

Placebuilder

The 2013 Plan eliminated the future land use map, which visually depicted future growth policies. There were several reasons for elimination of the map, which we do not question. Coincident with elimination of the map, the 2013 Plan also called for creating frameworks and policies to ensure intentionality, context sensitivity, and transparency in development and redevelopment. However, standards and guidelines were not adopted, and neighborhoods and citizens have been left feeling blindsided and frustrated.

Imagine Lexington seeks to remedy this issue in several ways, including through Placebuilder. Placebuilder provides a detailed framework to evaluate whether or not development proposals comply with the Comprehensive Plan. Instead of simply focusing on zoning, Placebuilder focuses equally on place, development type, and zoning. Placebuilder does provide some of the clarity and transparency the community desires. We applaud the Planning Staff for tackling this difficult issue and responding to the desires of the community.

Generally, Fayette Alliance supports Placebuilder and the criteria and guidelines contained therein.

However, from a citizen perspective, it is difficult to understand how Placebuilder will work in practice without some kind of visual representation. We recommend the creation of an interim "Placebuilder Policy Map" (or series of maps) that generally identifies the geographic areas that would be considered as each of the 7 Place-Types identified in Placebuilder. Such a map would not be intended to identify specific parcels, but rather give general orientation as to development policy intent in generalized areas of the City. Over time, the Placebuilder Policy Map could be refined based on Small Area Plans that can define more detailed boundaries of Place-Types, with a primary emphasis on defining 2nd Tier Urban, Regional Centers, and Corridors.

We certainly understand the challenges of creating these maps in such a way that they do not become de facto "future land use maps." However, we do think that illustrating the practical implications of Placebuilder would assist the community in understanding the overall growth strategy.

Established Existing Zones

The overarching purpose of Placebuilder is to provide certainty to developers and citizens on what is expected of new development, infill development, and redevelopment. The policies contained in Placebuilder address important data points such as our shifting demographics, changing nature of retail, and lack of diversity in our housing stock, as well as the community's desire for more walkability and access to amenities and green space.

Placebuilder includes geographic place-types and recommends certain development types and zones based on those place-types. However, several existing zones are not included in the sets of recommended zones. This exclusion is confusing and potentially creates conflicts between the Zoning Ordinance and the Comprehensive Plan. Placebuilder is a new tool. To avoid confusion and mitigate potential unintended consequences, we request that this issue be resolved.

Citizen Engagement and Notice

The Planning Staff has undertaken unprecedented efforts in the 2018 Comprehensive Plan process to engage citizens, gather input, and respond to the community's desires. We applaud the staff for their continued hard work and creativity in reaching out to the community.

Citizen engagement should not end once the Comp Plan is adopted. *Imagine Lexington* encourages citizen engagement both with respect to broad, community-wide issues and individual development projects. We strongly support these recommendations.

With respect to individual development projects, we support a process to foster meaningful dialogue between developers, neighborhoods and other stakeholders before the process begins and throughout the process. Including neighborhoods and citizens early in the process can help resolve differences.

We also recommend revising the notification to neighborhoods to be clearer and to include more information so that citizens can better understand the proposed project.

Metrics and Implementation

We greatly appreciate the extent to which the recommendations in *Imagine Lexington* are based on objective data and research. Going forward, it is critical that we carefully monitor our land use to determine if foundational data and projections are borne out and whether or not we are meeting our goals. We recommend periodic reports be made to the Planning Commission, Council, and community.

We look forward to continuing to work together as *Imagine Lexington* is implemented. To build on the incredible momentum and excitement about *Imagine Lexington*, we suggest creating a panel of diverse citizen stakeholders to assist with implementation and education efforts. The Planning Staff also used social media and other outreach methods in very creative ways to connect with Lexingtonians and gather feedback. We hope these effective efforts continue as well.

Conclusion

Thank you for your consideration of our recommendations. *Imagine Lexington* presents our community with an opportunity to strategically and intentionally plan for our long-term growth in a way that leverages our assets and creates a

vibrant city for all our citizens. It is an impressive and comprehensive document. We thank the Planning Staff and Planning Commission for their hard, diligent work, and commitment to our community.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Susan B. Speckert". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Susan B. Speckert, J.D.
Executive Director

Cc: Honorable Jim Gray, Mayor
Derek Paulsen, Commissioner Planning, Preservation and Development
Jim Duncan, Director of Planning
Chris Woodall, Manager of Long Range Planning
Chris Taylor, Long Range Planning