

October 28, 2021



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Brittany M. Roethemeier, J.D.

Dear Chair Forester and Members of the Planning Commission,

Please accept this letter on behalf of the Fayette Alliance with respect to the proposal of the Lexington Sustainable Growth Study for adoption as an element of the 2018 Comprehensive Plan, *Imagine Lexington*¹.

Founded in 2006, Fayette Alliance is a non-profit dedicated to achieving sustainable, equitable growth in Lexington-Fayette County through land use advocacy, education, and research. We believe that preserving our unique and productive Bluegrass farmland, advancing smart growth, innovative development and improving our infrastructure are all essential to Lexington's continued success.

In furtherance of this mission, we respectfully submit the following with regard to our support for the adoption of the Lexington Sustainable Growth Study² and recommendations for consideration around the same.

As Lexington-Fayette County continues to evolve, we know the question is not if we grow, but how. Since the institution of our Urban Services Boundary (USB) in 1958, Lexington's conversation around growth and development has been both innovative and complicated. We have been forward-looking and thoughtful in many ways; preventing urban sprawl and balancing the needs of our productive farmland - a major economic engine in our community - with the development needs of a growing city. Difficult and divisive questions around these issues will always exist, and it is time to ensure we have a data-driven approach for our community to answer them.

When the Staff recommended creating a new process for discussions about the Urban Services Boundary in 2017³, they were proposing an opportunity to take the long view about our growth needs and create the necessary time to implement the changes and steps critical to meet them. Having a divisive discussion about the USB, how much land we have, and how much land we need every 5 years prevents the Planning Staff, our Councilmembers and our community from moving forward with actually putting in place the policy changes that will make our Goals & Objectives, established with input from over 11,000 community members⁴, a reality for Lexington. Overwhelmingly,

¹ Hereinafter referred to as the "Plan".

² Lexington Sustainable Growth Study, which shall include, but not be limited to, the Existing Conditions and Growth Trends Report dated July 13, 2021 and the Evaluation Framework dated September 16, 2021, [lexsustainablegrowth.mysocialpinpoint.com](https://www.lexsustainablegrowth.mysocialpinpoint.com).

³ 2018 Comprehensive Plan Update Proposed Goals & Objectives, August 17, 2017.

⁴ Imagine Lexington Introduction, <https://www.imaginelexington.com/imagine>.

our community members did NOT support the expansion of the USB5, and those Goals & Objectives reflecting that position in the Plan include focusing our long term growth strategy on responsible and equitable infill and redevelopment as well as protecting and promoting our unique and productive farmland and natural resources.

Mayor Gorton created the Sustainable Growth Task Force to achieve this goal set forth in the Plan:

Protect Lexington’s invaluable rural resources and inform long range planning for infrastructure, community facilities and economic development through the creation of a new process for determining long-term land use decisions involving the Urban Services Boundary and Rural Activity Centers. ⁶

The work of the Task Force, made up of a diverse group of stakeholders from the community representing many different interests, and with a clear focus and strong leadership, offers us an exciting opportunity to shift in the long-term way we think about our community’s growth. **Based on the resulting work, we have the chance to adopt a process for evaluating our growth needs based on objective criteria and data about existing trends and existing land; increasing transparency and objectivity around difficult and contentious decisions which could be a tremendous benefit to our entire community.** This work can objectively inform the way our community understands our existing resources and makes decisions about our future.

The work of the Sustainable Growth Task Force has culminated in the creation of the Existing Conditions and Growth Trend Report (hereinafter “the Report”) and the Evaluation Framework. These are tools to inform, **not replace**, the Comprehensive Plan process which takes place every 5 years. **Adopting these tools to inform our Plan process could let us focus on *how we can use our land to meet our community goals instead of just how much land we have.*** The tools provide a data-driven way to measure what we have, and what we need, that are straightforward and repeatable.

The bigger discussion about growth, growth strategy, and the many factors involved should always take place within the Comprehensive Plan process - because it must involve the community. The Report and the Evaluation Framework are data based tools that can inform and guide this conversation, so it’s **fact** based instead of **opinion** based. The tools provide facts about how much land we have, what we can build on it if we use it in certain ways, and

⁵ According to the LFUCG Public Input Report, the “Urban Service Area Boundary was the most discussed issue from the Growth category, with the majority of participants advocating for not expanding its limits.” Pg. 4. The LFUCG Green Space Survey found 72% of participants do not support expansion. <https://www.lexingtonky.gov/boards/greenspace-commission>.

⁶ 2018 Comprehensive Plan, Imagine Lexington, Theme E, Goal 4, available at <https://www.imaginelexington.com/goals>.

whether that use helps us achieve the Goals and Objectives set out in the Plan, created by our own community. This information will more accurately inform the bigger picture; including conversations about affordability, equity, quality of life, and more. They will inform how we can work, through the Plan process and through public policy created out of the same, to maximize development, promote economic growth and development, encourage quality of life and infrastructure investments, and work towards equity while preventing displacement, all on our existing land inside the USB.

The Sustainable Growth Study has done 3 critical things:

1) It compiled straightforward numbers on how many vacant acres we have for residential , commercial, and industrial uses AND projected how much space we will need in each of these categories for the next 20 years. This number can be updated routinely as land gets developed and we better understand the impacts of the pandemic and other factors on our development needs. It also opens the door for an Annual Development Summary which can show the community how much land we've used in these categories on a routine basis.

2) It developed 3 scenarios for how we could *possibly* develop our land, which range from what happens if development follows current trends to what happens if we fully implement the vision for growth set out in the Plan. Then, it calculated how many housing units and square feet of office, retail and industrial space we could fit in each scenario of growth. It shows us, in numbers, that if we work together to implement the Goals and Objectives the community set out in the Plan, we have enough existing land to meet our needs in each category.

3) It established weighted criteria to evaluate how the results of each scenario compare to the Goals and Objectives established by the community in the Plan. The criteria can change as our community goals change in future years, but they will always be determined by the Plan process.

Based upon the framework created from this information, a “score” is given to each growth scenario. The score tells us whether, with the amount of land we have, we can accommodate the growth we're anticipating in our residential, commercial/retail, and industrial areas and whether the development strategy of the scenario meets the goals and objectives of the Plan. **It gives us a repeatable and flexible way to measure existing conditions, objective and consistent data points, where we are in meeting our goals and a way to alert us when we might need to change course (and update policies) to do so.** It gives us the opportunity to use an objective process to understand how much land we have - so that it is removed from the divisive community debate. **The question for informed discussion during the Plan process with the community then becomes: how should we use the**

land we have to meet our needs, based on the kind of community we want to be?

If we focus on the opportunity the Report and Evaluation Framework give us, we can achieve an exciting goal: **to have a more data-driven process to guide community conversations about growth.** Adopting the Sustainable Growth Study as a way to inform our future Plans is the first step to getting there. In order to thoughtfully talk about when expansion should be considered in the future, and every factor which goes into that consideration (cost, suitability of land, infrastructure, and more), we must first know exactly what our existing resources are and how we can best use what we have now. **That** is making growth decisions that are responsible and sustainable for Lexington's future.

With regard to the Sustainable Growth Study and its adoption, Fayette Alliance would recommend the following:

- All public policy decisions around the Urban Services Boundary and Lexington's growth strategy happen within the Comprehensive Planning process, but are informed by the objective, data-driven and repeatable processes established by the Sustainable Growth Study.
- The objective data points established by the Sustainable Growth Study in each of 4 land-use categories (residential, commercial, industrial, and office) are updated on an annual basis by Planning Staff in the form of an Annual Development Summary, made available to the public. This ensures that our community members are able to understand the absorption rate of our land in each category to further inform ongoing conversations about growth on a regular basis.
- Theme E, Goal 3 of the 2018 Comprehensive Plan, *Imagine Lexington*, remains in effect, and is not superseded by the Sustainable Growth Study.
- Pursuant to the objective, data-driven information about our current conditions in the Sustainable Growth Study, we continue to focus our future Comprehensive Planning efforts on utilizing existing land to maximize development of diverse housing types, Affordable housing, infrastructure investment and planning in our existing vacant expansion areas, incentivizing development of our underused and underutilized commercial areas and corridors, and other Goals & Objectives as set forth in the Plan.

This work can be complicated; because the growth of our community is complicated. All issues around growth are not able to be dealt with objectively, because they require community input, which is why our Comprehensive Planning process remains vital. There are no silver bullets to answer all of our community's questions, but some of the most divisive can be answered with data-driven processes that help to inform our Comprehensive Planning. The Sustainable Growth Study provides us an enormous and exciting opportunity to provide our community members and decision makers with straightforward and objective data, so we can all make more informed decisions about the way Lexington grows. If we want to work for a sustainable and equitable future, we should look to the Sustainable Growth Study as an opportunity to make informed choices, together.

I know how committed each of you are to Lexington. On behalf of the Fayette Alliance, I sincerely thank you for your consideration.

With gratitude,

A handwritten signature in cursive script that reads "Brittany M. Roethemeier". The signature is written in black ink and is positioned below the text "With gratitude,".

Brittany M. Roethemeier, J.D.
Executive Director
Fayette Alliance