



The Fayette Alliance

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LFUCG Board of Adjustment
200 East Main Street
Lexington, KY 40507

June 24th, 2010

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Executive Director
Knox van Nagell

Dear Chairman Brown and Board of Adjustment Members,

My name is Knox van Nagell, and I am here on behalf of The Fayette Alliance. The Fayette Alliance is Lexington's only land-use advocacy organization dedicated solely to preserving our renowned rural landscape in Fayette County, while strengthening the city of Lexington through innovative infill redevelopment and improved waterways.

If responsibly pursued, this growth strategy will advance our city and protect our productive and beautiful farmland—creating a quality of life crucial to Lexington-Fayette County's economic and environmental success today and beyond.

In furtherance of this mission, The Fayette Alliance joins the LFUCG planning staff in recommending DISAPPROVAL of A-2010-56—an appeal for an administrative review to allow temporary parking and occupancy of recreational vehicles (R.V.s) in an Economic Development (ED) zone on property located at 2215 Mary Fay Place and 1201 Providence Place Parkway. This area is a short distance from the Kentucky Horse Park—located North-East of the Newtown Pike/Interstate 75 Interchange.

The Planning Commission has approved the subject property for development—via a Final Development Plan—consisting of a combined 10,000 square feet of professional office, manufacturing, and distribution uses. R.V. campsites are not part of the approved zoning or development plan.

However, if this appeal is approved, the appellant intends to construct 100 R.V. parking sites—approximately 30' feet wide—on the subject property for the World Equestrian Games. Water, electric hook-ups, and sewage pump-outs will not be provided. Appellants have not disclosed the intended paving or graveling to be used.

Ultimately, the appeal should be denied for the following reasons:

1. An R.V. park is not a permitted use in the Economic Development Zone

The purpose of the Economic Development Zone is to promote land-uses that create jobs and incubate business. For instance, allowed principle uses in this zone include offices, research development and testing laboratories, a variety of industrial/manufacturing/and related uses, medial services, and academic schools and institutions.

An R.V. park does not fulfill the intended aforementioned uses, nor the critical economic development needs of the community.

While the WEG poses a remarkable opportunity for Central Kentucky, we must accommodate its parking and housing needs within the constraints of the law—otherwise potentially dangerous land-use precedents will be established and furthered.

2. An R.V. park is not akin to the allowed accessory use of an “off-street parking area” in the E.D. zone., and is therefore not allowed.

Article 1-1 of the Zoning Ordinance defines accessory uses as being “subordinate to the principle use or building on a lot and serving a purpose customarily incidental thereto”.

As expressly stated in the Staff Report, “there is no principal use of the subject property, existing or proposed, for this off-street parking area to serve as its accessory use.” *Staff Report, p. 2.*

Further, the proposed R.V. park is wholly dissimilar from the approved development plan and its related off-street parking areas for the property.

As such, an R.V. park can in no way be considered an accessory use of the ED zone.

3. To allow an R.V. park on the subject property—despite its related ED zoning classification and Final Development Plan—would jeopardize the public health, safety, and welfare of the community.

The appellant provides no reasonable justification for why an R.V. Park should be a permitted principal or accessory use in the E.D. zone.

Further, the appellant has failed to adequately detail how essential services—such as electric, sewage, and potable water—will be provided for users of the R.V. park.

As noted in the staff report “the lack of any essential services...could adversely impact the surrounding properties, and possibly threaten the public health, safety and welfare” of the community. *Staff Report, p. 2.*

For the aforementioned reasons, The Fayette Alliance joins Planning Staff in recommending DISAPPROVAL of A-2010-56. Simply, the Board of Adjustment should uphold Building Inspection’s denial of appellant’s permit, and disapprove the appeal.

Thank you for consideration, and dedication to responsible land-use planning.

Respectfully,

Knox van Nagell