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LFUCG Planning Commission  
Government Center  
200 East Main Street  
Lexington, KY 40507

June 24<sup>th</sup>, 2013

Dear Chairman Owens and Planning Commissioners,

My name is Knox van Nagell, and I am writing this letter on behalf of Fayette Alliance.

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.

Through our efforts at government and beyond, Lexington can become the model for sustainable growth, by connecting and balancing its vibrant city with its unique and productive Bluegrass farmland.

In furtherance of this mission, Fayette Alliance supports the Planning Staff's proposal and recommendation for ZOTA 2013-2: Hospice Facilities in the Economic Development (ED) Zone.

As you know, Hospice of the Bluegrass seeks to construct a facility in the ED Zone, on a site located off Newtown Pike. The scope of its services will include providing medical and palliative care to persons in their final stages of life; in addition to offering office and pharmaceutical space that is accessory to its main purpose as well.

The intent of the ED Zone is to:

“Provide land within the Expansion Area for employment opportunities compatible with the overall character of development as provided in the Expansion Area Master Plan.”  
Article 23A-10, Zoning Ordinance

The Expansion Area Master Plan, via the ED zone, currently permits medical clinics, and regional medical campuses consisting of an “integrated complex of medical service providers and related support facilities”. Staff Report, pg. 1.

However, hospices fail to meet the definition of a “regional medical campus”, as they provide overnight in-patient care to its users. This primary difference, among other minor issues, gave rise to this text amendment application.

To address this discrepancy, Urban County Council initiated ZOTA 2013-2, which if adopted, defines hospice as:

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Knox van Nagell, J.D.



HOSPICE- A facility which provides support and care for persons in the last stage of an incurable disease or condition, and to their families. Overnight, in-patient and outpatient facilities may be included as well as offices, storage, and an associated pharmacy. Medical care, palliative care, counseling, and education may be provided.

If the ZOTA proposal is adopted, hospices and their associated activities will be incorporated in the ED Zone as follows:

- In Article 23A-10 (b), hospices, along with medical and dental offices, clinics, and laboratories are permitted principle uses.
- In Article 23A-10 (c) pharmacies associated with hospices are permitted as accessory uses.
- In Article 23A-10 (i), hospices will be required to provide one parking space for every two beds in the facility; plus one (1) space for each employee on the maximum working shift with a minimum of five (5) spaces.

Fayette Alliance supports the proposed changes to the ED Zone. Hospices are closely akin to the medical facilities already allowed in the ED Zone, and will have minimal impacts to surrounding rural and residential neighbors of the Expansion Area.

In addition, agriculture, high-tech, and healthcare are the primary economic pillars of Lexington and what makes it an attractive place to live and do business—and hospice plays an essential role in the healthcare sector of our city and state.

Lastly, allowing hospices in the ED zone will improve the marketability of that zone, which for years has struggled to live up to its promise of creating jobs and attracting new economic activity to Fayette County. With this ZOTA proposal, Lexington can secure needed medical facilities on land already inside the Urban Services Area.

For these reasons, Fayette Alliance asks that you recommend approval of ZOTA 201-12: HOSPICE FACILITIES IN THE ED ZONE, as it advances the intent of the ED Zone, the Goals and Objectives of the 2007 Comprehensive Plan, and sustainable growth. We join the Planning Staff in recommending approval.

Thank you for your consideration of our position, and dedication to Lexington-Fayette County.

Respectfully,

A handwritten signature in black ink that reads "Knox van Nagell". The signature is written in a cursive, slightly slanted style.

Knox van Nagell, J.D.