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November 26, 2018

Lexington-Fayette Urban County Planning Commission  
Lexington-Fayette Urban County Government  
101 East Vine Street  
Lexington, KY 40507

**Re: Zone change request for 5301 and 5305 Athens Boonesboro Road (the "Property")**

Dear Members of the Planning Commission:

I represent IVCP Athens LLC ("IVCP" or "Applicant"). I filed a zone change request for properties located at 5301 and 5305 Athens Boonesboro Road. I filed the following documents in support of the zone change request:

1. Zone change application (Accela)
2. Legal Description
3. Property Information
4. Notification Map
5. Notification List of Surrounding Property Owners
6. Notification Letter
7. Stamped and Addressed Envelopes for Notification Letters
8. Property Deed
9. Preliminary Subdivision Plan for the Property

The Property consists of 11.52 acres. IVCP's request is to rezone Agricultural Rural (A-R) zone to Light Industrial (I-1) zone. The Property is currently vacant, except for a small pump station located at 5305 Athens Boonesboro which will be relocated as part of the development plan. The zone change request is for a project to develop light industrial uses—specifically, warehousing—near the I-75 corridor and Blue Sky Rural Activity Center ("Blue Sky") to support current nearby industry and future development. Pursuant to the Rural Land Management Plan, Blue Sky is recommended primarily for warehousing, light industrial, and interstate commercial development. The Property is situated in the northwest quadrant of the Athens Boonesboro Road/I-75 intersection. Its eastern border is I-75, and the southern border is two parcels fronting Athens Boonesboro Road which are already zoned B-5P. Just across I-75 is another small B-5P zone and, importantly, Blue Sky, which contains 113 parcels of I-1 Light

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Industrial zoning. Currently, the Property is one of the few remaining parcels immediately surrounding this Blue Sky/I-75 area which is restricted to A-R zoning. Granting the zone change request will support the nearby existing industry and be consistent with surrounding uses without changing the overall appearance, accessibility, and character of the area.

This request is in full compliance with the 2013 Comprehensive Plan, the Goals and Objectives of the 2018 Comprehensive Plan, and the 2017 Rural Land Management Plan. First, the project will support, develop, and enhance economic growth in the I-75 corridor. Second, the zoning request will place the Property into a zone class typically found at or near interstate interchanges. Third, the request will allow the Property—currently vacant—to have a more productive and beneficial use for the good of surrounding businesses and residents. Fourth, the zone change will allow needed light industrial uses to occur near the I-75 corridor, which has the capacity for increased traffic. Further, by placing this light industrial zone near the I-75 corridor and Blue Sky, Lexington-Fayette County will benefit from increased economic and employment opportunities without adding to traffic congestion within the Urban Service Area where most residents live and work.

### **2013 & 2018 COMPREHENSIVE PLANS<sup>1</sup>**

#### **THEME A: GROWING SUCCESSFUL NEIGHBORHOODS**

#### **GOAL 3: Provide well-designed neighborhoods and communities.**

##### Objectives:

- a. Enable existing and new neighborhoods to flourish through improved regulation, expanded opportunities for neighborhood character preservation, and public commitment to expand options for mixed-use and mixed-type housing throughout Lexington-Fayette County.
- c. Minimize disruption of natural features when building new communities.

The requested zone change will not fundamentally alter the existing character of the surrounding area. No natural features will be disrupted.

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<sup>1</sup> The applicable and referenced themes, goals, and objectives are found in substantially identical forms in both the 2013 Comprehensive Plan and the Goals and Objectives approved to be included in the soon-finalized 2018 Comprehensive Plan.

**THEME C: CREATING JOBS AND PROSPERITY**

**GOAL 1: Support and showcase local assets to further the creation of a variety of jobs.**

Objectives:

- a. Strengthen efforts to develop a variety of job opportunities that lead to prosperity for all.
- d. Foster the success and growth of large employment sectors; protect and provide readily available economic development land to meet the needs for jobs; and enable infill and redevelopment that creates jobs where people live.

The requested zone change will provide new employment and economic opportunities for its part of Lexington-Fayette County. The Property is located near a high-capacity roadway (I-75) that can easily serve the new zoning and proposed uses without further congesting the Urban Service Area.

**GOAL 2: Attract the world's finest jobs, encourage entrepreneurial spirit, and enhance our ability to recruit and retain a talented, creative workforce by establishing opportunities that embrace diversity with inclusion in our community.**

Objectives:

- a. Identify and promote sectors of the economy that will flourish in Lexington-Fayette County.
- d. Provide entertainment and other quality of life opportunities that attract young professionals and a workforce of all ages and talents to Lexington.

The proposed warehousing use will add needed economic infrastructure and employment opportunities in an area which has already been successful in serving these purposes.

**THEME D: IMPROVING A DESIRABLE COMMUNITY**

**GOAL 1: Work to achieve an effective and comprehensive transportation system.**

Objectives:

- c. Improve traffic operation strategies.

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By locating this use nearby Blue Sky and with easy access to two major roadways, there should be little if any net addition to traffic in Lexington-Fayette County.

**THEME E: MAINTAINING A BALANCE BETWEEN PLANNING FOR URBAN USES  
AND SAFEGUARDING RURAL LAND**

**GOAL 2: Support the agricultural economy, horse farms, general agricultural, and the character of the Rural Service Area.**

Objectives:

- b. Protect and enhance the natural, cultural, historic, and environmental resources of Lexington-Fayette County's Rural Service Area and Bluegrass farmland to help promote the general agricultural brand and ensure Lexington-Fayette County remains the Horse Capital of the World.

The proposed change is in an area which is already developed. The Property is adjacent to existing interstate commercial uses and a proposed hotel, and is within a short distance from Blue Sky. In short, the area is already commercially developed and the proposed zoning and use will not fundamentally alter the character of the Rural Service Area.

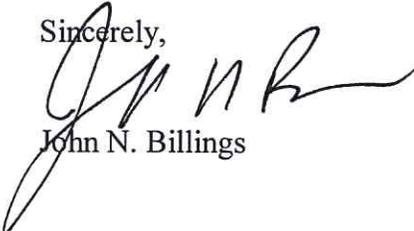
**GOAL 3: Maintain the current boundaries of the Urban Service Area and Rural Activity Centers; and create no new Rural Activities Centers.**

While the project is designed to take advantage of the proximity to I-75 and Blue Sky, the project is not an expansion of Blue Sky, which is on the opposite side of the highway. The proposed uses would be consistent with nearby interstate commercial, business, and light industrial zoning, but would not expand Blue Sky or alter the Urban Service Area boundary.

The existing A-R zoning is inappropriate because the parcel is adjacent to a major interchange and is among the only such parcels not zoned for an appropriate interstate commercial use. I-1 zoning will allow the area to be better served and supported, and will put now-vacant agricultural land to a more productive, beneficial use without a significant change to the character of the area.

I appreciate your time and attention to this zone change request, and I look forward to fully presenting the project to you soon.

Sincerely,

  
John N. Billings