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

Zone Change Request for 421 Price Road

Dear Members of the Planning Commission:

We represent Fayette MHC LP (“Applicant”) and, on its behalf, have filed a zone change request for a portion the property known as 421 Price Road (the “Property”). The Property is currently split zoned between Single Family Residential (R-1D) and Mobile Home Park (M-1P) zones. The portion of the Property subject to the zone change request consists of 16.541 net (16.754 gross) acres currently zoned Single Family Residential (R-1D) that is vacant with an existing agricultural barn. The balance of the Property, currently zoned M-1P, is the location of the existing Suburban Pointe mobile home park. The Applicant’s request is to rezone the R-1B portion of the Property to Mobile Home Park (M-1P) zone to allow for an expansion and formal amenity area for the adjacent Suburban Pointe mobile home park.

The Property is located inside New Circle Road south of the Saint Martins Village neighborhood and is a split zoned parcel between M-1P and R-1D. This request is to rezone the entirety to M-1P. The proposed development consists of 52 mobile home pads that are much larger than the majority of the existing units inside the Suburban Point Park. The proposed typical lot is approximately 38’ x 54’ that can install units with 2-4 bedrooms and 2-3 baths. Once the proposed development is consolidated with the Suburban Pointe Park, there will be a total of 601 units offering affordable housing on 88 acres with a density of 6.8 units per acre. The surrounding area is comprised of complementary single-family residential neighborhoods, LFUCG’s Whitney Young Park, and the Lexington Cemetery. The proposed development is consistent with the existing mobile home park and will complete the residential area on the north side of Price Road. This will ensure that a much-needed residential development and enhanced amenities area on underutilized land will be installed in a consistent manner that neighbors have come to expect.

At its core, the Suburban Pointe development brings affordable housing to Lexingtonians in a manner that allows home ownership at a cost that is less than the rental market offers, much less the home ownership market. With this expansion of Suburban Pointe, there are five models of homes that will be able to be installed on the individual pads. The cost to residents for these units are all less per month, on average, than renting a similar equipped single-family house – not to mention the substantial difference in purchasing a single-family unit. The proposed expansion allows for home ownership in a market that is increasingly difficult to find even rental units that

are affordable. All the while, this proposal will increase the quality of life for the current area’s residents. Here are the estimated total monthly payments for the new units and a comparison to the rental stock and for purchase available according to Zillow.

**Suburban Pointe Model Units**

Unit Size	Bedrooms	Bath	Total Monthly Payment*	Purchase Price
16x56	2	2	\$ 1,304.00	\$ 56,995.00
16x66	3	2	\$ 1,358.00	\$ 61,995.00
24x48	3	2	\$ 1,496.00	\$ 78,995.00
28x56	3	2	\$ 1,548.00	\$ 83,995.00
28x68	4	2	\$ 1,548.00	\$ 92,995.00

\* Total Monthly Payment includes mortgage payment (principal, interest, tax, and insurance) and lot rent.

**Lexington Rental Market**

Bedrooms	Bath	Lowest Rent	Highest Rent	Average Rent
2	2	\$ 975.00	\$ 3,500.00	\$ 1,252.00
3	2	\$ 1,167.00	\$ 4,100.00	\$ 1,900.00
4	2	\$ 1,700.00	\$ 3,800.00	\$ 2,408.00

**Lexington Purchase Market**

Bedrooms	Bath	Average Price	Comments
2	2	\$ 310,874.00	2 Homes below \$200,000
3	2+	\$ 320,000.00	75% are over \$300,000
4	2+	\$ 708,830.00	4 homes below \$400,000

This request is in agreement with the Comprehensive Plan for the multitude of reasons outlined below. Primarily, the Zone Map Amendment Request offers a chance to develop longtime vacant land inside the Urban Service Area for much needed affordable housing. This is an ideal property for the proposed expansion, as it will allow a more uniform feel along Price Road by expanding the existing complex with a focus on open space amenities currently proposed for a soccer field, basketball court, dog park, and community center. This well-designed project upholds the Urban Service Area preservation strategy, is appropriate infill in an area where the proposed use already exists, provides varied affordable housing choices in consideration of the adjacent traditional single-family neighborhood which meets several community needs, encourages community interaction through pedestrian connectivity and substantial amenity area, and all while respecting its neighbors with landscaping buffer and greenspace.

This project aligns with the aspects of a desirable community and the place making concepts the Comprehensive Plan stresses such as openness, social offerings, and aesthetics with its connections to the existing vehicular and pedestrian facilities. The proposed development plan

follows many of the specific recommendations of the Comprehensive Plan in its discussion on how to grow successful neighborhoods while protecting the environment as we are expanding the housing types in the area by providing additional mobile home units; supporting infill and redevelopment throughout the urban service area; increasing the residential units in close proximity to the LexTran route serving Price Road; and, providing a well-designed community that furthers the commitment to mixed-type housing with locations for safe and positive social interactions including easy access to the amenity area and connections to Whitney Young Park. The proposed development will not put undue strain on the surrounding infrastructure as the Property's development is, in fact, crucial to allowing LFUCG to upgrade the neighborhood's sanitary sewer pump station as called for in the Consent Decree. In fact, this proposed development process began when LFUCG's Division of Water Quality engaged the Applicant with respect to LFUCG's desire to install a new sewer transmission line through the Property. Unfortunately, this area is subject to frequent sanitary sewer overflows. With the Applicant and Water Quality cooperation, the proposed development plan will increase affordable housing while solving one of the last remaining Lexington pump station upgrades required by the Consent Decree. If the proposed zone change is granted, it will be a true victory for LFUCG, nearby residents, the surrounding area, and the Applicant.

The Applicant is quite confident in calling this a well-designed project as it furthers many of the design policies laid out in the Comprehensive Plan. By providing ample roadway and pedestrian connections, we are utilizing a people-first/pedestrian friendly street pattern design with efficient roadways, pedestrian infrastructure that is improve the area's connectivity, while also making the proper road connections to enhance the accessibility for emergency services, and creating inviting streetscapes. (Design Policy #1, #2, #5, #6, and #13). One of the principal reasons for this development is to improve the standard of living for the existing Suburban Pointe residents with an enhanced open space and amenities package. This amenities and open space area will directly connect Suburban Pointe into the existing pedestrian system that is a short distance walk to Whitney Young Park and FCPS's The Learning Center. (Desing Policy #9).

In summary, this well-designed project upholds the Urban Service Area preservation strategy, is appropriate development of a long underutilized parcel, provides additional affordable housing units, encourages community interaction through pedestrian connectivity, encourages a more comprehensive transportation system, all while respecting its neighbors and protecting the environment with landscaping buffers and greenspace. As such, it is quite clear that the proposed zone change is in compliance with the 2045 Comprehensive Plan. As outlined above, the proposed project meets the following Goals and Objectives of the Comprehensive Plan:

**Theme A - Growing Successful Neighborhoods**

**Goal 1:** Expand housing choices.

Objectives:

- b. Accommodate the demand for housing in Lexington responsibly, prioritizing...a mixture of housing types.
- c. Plan for safe, affordable and accessible housing to meet the needs of Lexington's aging population and residents with disabilities.

**Goal 2:** Support infill and redevelopment throughout the Urban Service Area as a strategic component of growth.

Objectives:

- b. Respect the context and design features of areas surrounding development projects.
- c. Incorporate adequate greenspace and open space into all development projects, which serve the needs of the intended population.

**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
- b. Strive for positive and safe social interactions in neighborhoods, including, but not limited to, neighborhoods that are connected for pedestrians and various modes of transportation.
- c. Minimize disruption of natural features when building new communities.
- d. Promote, maintain, and expand the urban forest throughout Lexington.

**Goal 4:** Address community facilities at a neighborhood scale.

Objectives:

- a. Incorporate schools, libraries, parks, greenways, and other community focused educational and recreational facilities into neighborhoods in order to maximize safe routes for all pedestrians and bicyclists.
- c. Establish and promote road network connections in order to reduce police, EMS, and fire response times.

**Theme B - Protecting the Environment**

**Goal 1:** Protect water resources by improving urban stormwater and sanitary sewer infrastructure.

Objectives:

- a. Continue to implement sanitary sewer Consent Decree programs (remedial measures, capacity assurance, management, operation and maintenance).
- f. Ensure stormwater and sanitary sewer infrastructure is placed in the most efficient and effective location to serve its intended purpose.

**Goal 2:** Identify and mitigate local impacts of climate change by tracking and reducing Lexington-Fayette County's carbon footprint and greenhouse gas emissions, and commit to community-wide net zero greenhouse gas emissions by the Year 2050.

Objectives:

- d. Prioritize multi-modal options that de-emphasize single-occupancy vehicle dependence.

**Goal 3:** Apply environmentally sustainable practices to protect, conserve and restore landscapes and natural resources.

Objectives:

- f. Promote, maintain, and expand the urban forest throughout Lexington.

**Theme D - Improving a Desirable Community**

**Goal 1:** Work to achieve an effective, equitable, and comprehensive transportation system.

**Objectives:**

- b. Expand the network of accessible transportation options for residents and commuters, which may include the use of mass transit, bicycles, walkways, ride-sharing, greenways and other strategies.
- f. Enhance transportation options that are affordable, equitable, and responsive to the needs of residents and that support their preferred or necessary mode of transportation, with an emphasis on sidewalk improvements and connectivity

**Goal 2:** Support a model of development that focuses on people-first to meet the health, safety and quality of life needs of Lexington-Fayette County's residents and visitors.

**Theme E - Maintaining a Balance between Planning for Urban Uses and Safeguarding Rural Land**

**Goal 1:** Uphold the Urban Service Area concept.

**Objectives:**

- c. Ensure all types of development are environmentally, economically, and socially sustainable to accommodate the future growth needs of all residents while safeguarding rural land.
- d. Emphasize redevelopment of underutilized corridors.
- f. Pursue strategies to activate large undeveloped landholdings within the Urban Service Area.

**Placebuilder**

The Property is located inside New Circle Road and is adjacent to a residential neighborhood and mobile home park. As such, the natural Place Type is Enhanced Neighborhood, and the Development Type is Low Density for the expanded portion of the Suburban Pointe Park. We submit that this classification is appropriate due to the location of the Property well outside the downtown core and the surrounding 2<sup>nd</sup> tier urban neighborhoods and the proposed use is adding additional units to an existing development.

Also submitted with the Zone Map Amendment Request is the color-coded reflection of how the proposed project addresses the design criteria for the selected Development Types. Items highlighted in green are represented graphically on the submitted preliminary development plan; items in yellow are addressed in this letter, and items highlighted in red are not applicable to this proposal.

### **Standards That Are Applicable to Our Proposal**

#### LAND USE

A-DN2-1 Infill residential should aim to increase density. This infill project will help achieve adding in additional housing types to the area with the introduction of new mobile home options to increase density at an affordable rate. While the proposed development might not be dense as the existing mobile home park it is connected to, it will increase density while adding in much needed open space and amenities for an underserved mobile home park.

A-DN4-1 Provide new compact single-family housing types. This infill project will help achieve adding in additional housing types to the area with the introduction of new mobile home options to increase density at an affordable rate.

B-SU3-1 Development should provide compact and/or mixed-use development. The Suburban Pointe Park is a very dense, compact development. This development will increase density while adding in much needed open space and amenities for an underserved mobile home park.

C-LI6-1 ADUs and/or affordable housing options should be incorporated into existing and new single-family residential development. (A-DN5). This development will be affordable housing option for Lexington as detailed above.

C-LI7-1 Developments should create mixed-use neighborhoods with safe access to community facilities, greenspace, employment, businesses, shopping, and entertainment. The proposed development is connecting to all existing stub streets and pedestrian infrastructure to provide safe access for existing residents and the proposed units. In addition to the proposed amenities on site, this development will allow for pedestrian access to LFUCG parks and FCPS's The Learning Center which does not currently exist for Suburban Pointe residents.

D-PL7-1 Stakeholders should be consulted to discuss site opportunities and constraints prior to submitting an application. A neighborhood meeting has been scheduled for any interested residents in the area.

D-SP1-1 Elementary and middle schools should be located within residential neighborhoods, and high schools primarily along collector streets. (A-EQ7). FCPS's The Learning Center is in close proximity to this enhanced neighborhood project.

E-ST8-2 Development should provide community-oriented places and services. The proposed development is connecting to all existing stub streets and pedestrian infrastructure to provide safe access for existing residents and the proposed units. In addition to the proposed amenities on site, this development will allow for pedestrian access to LFUCG parks and FCPS's The Learning Center which does not currently exist for Suburban Pointe residents.

E-GR3-1 Development should meet recreational needs by following the recommendations of the Parks Master Plan. This is being done where feasible on site.

## TRANSPORTATION, CONNECTIVITY, AND WALKABILITY

A-DS1-1 Mass transit infrastructure such as seating and shelters should be provided/enhanced along transit routes. The Property is within one block to an existing route, but it is not located along a current LexTran route.

A-DS1-2 Accessible pedestrian linkages to transit should be provided. The development is adding sidewalk infrastructure along Price Road providing pedestrian linkage to an exiting transit route.

A-DS4-1 A plan for a connected multi-modal network to adjacent neighborhoods, greenspaces, developments and complementary uses should be provided. The development is appropriately connected to the existing surrounding pedestrian infrastructure, amenity areas, and greenspaces.

A-DS5-1 Safe multi-modal facilities should be provided to ensure vehicular separation from bicycles, pedestrians and other modes of transport. The development is appropriately connected to the existing surrounding pedestrian infrastructure, amenity areas, and greenspaces.

A-DS5-2 Developments should incorporate vertical elements, such as street trees and buildings, to create a walkable streetscape. This development is adding substantial street trees to the area with enhanced pedestrian infrastructure

A-DS10-1 New developments should incorporate clear and dedicated connections to nearby community anchors. The proposed development is connecting to all existing stub streets and pedestrian infrastructure to provide safe access for existing residents and the proposed units. In addition to the proposed amenities on site, this development will allow for pedestrian access to LFUCG parks and FCPS's The Learning Center which does not currently exist for Suburban Pointe residents.

A-DS11-1 Street layouts should provide clear, visible access to neighborhood-focused open space and greenspaces. The proposed development is connecting to all existing stub streets and pedestrian infrastructure to provide safe access for existing residents and the proposed units. In addition to the proposed amenities on site, this development will allow for pedestrian access to LFUCG parks and FCPS's The Learning Center which does not currently exist for Suburban Pointe residents.

A-DS13-1 Stub streets should be connected. The proposed development is connecting to all existing stub streets and pedestrian infrastructure to provide safe access for existing residents and the proposed units. In addition to the proposed amenities on site, this development will allow for pedestrian access to LFUCG parks and FCPS's The Learning Center which does not currently exist for Suburban Pointe residents.

D-CO1-1 Rights-of-way and multimodal facilities should be designed to reflect and promote the desired place-type. The proposed development is connecting to all existing stub streets and pedestrian infrastructure to provide safe access for existing residents and the proposed units. In addition to the proposed amenities on site, this development will allow for pedestrian

access to LFUCG parks and FCPS's The Learning Center which does not currently exist for Suburban Pointe residents.

D-CO2-1 Development should create and/or expand a connected multimodal transportation network that satisfies all users' needs. The proposed development is connecting to all existing stub streets and pedestrian infrastructure to provide safe access for existing residents and the proposed units. In addition to the proposed amenities on site, this development will allow for pedestrian access to LFUCG parks and FCPS's The Learning Center which does not currently exist for Suburban Pointe residents.

D-CO4-1 Dead-end streets and cul-de-sacs should be discouraged. The proposed development is removing several existing dead-end streets to provide better area connectivity.

D-CO4-2 Provide multiple route options (grid type structure) to alleviate congestion in lieu of additional lanes upon existing roadways. This is being done where feasible based on the existing fixed stub street locations.

D-CO4-3 Street pattern and design should consider site topography and minimize grading where possible. This is being done where feasible.

#### ENVIRONMENTAL SUSTAINABILITY AND RESILIENCY

B-PR2-2 Development should include regularly spaced access with an adequate width to the greenway network and conservation areas. The proposed development is connecting to all existing stub streets and pedestrian infrastructure to provide safe access for existing residents and the proposed units. In addition to the proposed amenities on site, this development will allow for pedestrian access to LFUCG parks and FCPS's The Learning Center which does not currently exist for Suburban Pointe residents.

B-PR7-1 Developments should be designed to minimize tree removal and to protect and preserve existing significant trees. This has been done where feasible.

B-PR9-1 Minimize grading and topsoil disturbance by utilizing the existing topography to the greatest extent possible and preserving key natural features. This has been done where feasible.

B-PR10-1 Development should avoid overlighting and upward directed lighting. This has been done where feasible.

B-SU4-1 Development should minimize and/or mitigate impervious surfaces. This has been done where feasible.

B-SU11-1 Development should incorporate low impact landscaping and native plant species. This has been done where feasible.

B-RE1-1 Developments should improve the tree canopy. This development is increasing the tree canopy.



B-RE2-1 Lexington's green infrastructure network, including parks, trails, greenways, or natural areas should be highly visible and accessible. The proposed development is connecting to all existing stub streets and pedestrian infrastructure to provide safe access for existing residents and the proposed units. In addition to the proposed amenities on site, this development will allow for pedestrian access to LFUCG parks and FCPS's The Learning Center which does not currently exist for Suburban Pointe residents.

B-RE5-1 Dividing floodplains into privately owned parcels with flood insurance should be avoided. There are no proposed privately owned parcels with floodplain.

B-RE5-2 Floodplains should be incorporated into accessible greenspace, and additional protection should be provided to areas around them. This is being done where feasible.

D-SP10-1 Prioritize street trees in the planting strip. This is being done where feasible.

#### SITE DESIGN

A-DS9-1 Development should provide active and engaging amenities within neighborhood focused open spaces. The proposed development is connecting to all existing stub streets and pedestrian infrastructure to provide safe access for existing residents and the proposed units. In addition to the proposed amenities on site, this development will allow for pedestrian access to LFUCG parks which does not currently exist for Suburban Pointe residents.

A-DS9-2 Where neighborhood open space or parks are not located within walking distance of a new development, applicants should incorporate these facilities. The proposed development is connecting to all existing stub streets and pedestrian infrastructure to provide safe access for existing residents and the proposed units. In addition to the proposed amenities on site, this development will allow for pedestrian access to LFUCG parks which does not currently exist for Suburban Pointe residents.

A-EQ9-2 Shared open spaces should be easily accessible and clearly delineated from private open spaces. This is being done where feasible.

C-LI8-1 Development should enhance a well-connected and activated public realm. The proposed development is connecting to all existing stub streets and pedestrian infrastructure to provide safe access for existing residents and the proposed units. In addition to the proposed amenities on site, this development will allow for pedestrian access to LFUCG parks which does not currently exist for Suburban Pointe residents.

C-PS10-2 Over-parking of new developments should be avoided. This development is not overparked.

D-PL4-1 Enhance open space through the provision of programmatic elements and amenities. A major motive for this request is to add the proposed amenities area for existing and future residents.

## BUILDING FORM

A-DS5-3 Building orientation should maximize connections with the street and create a pedestrian-friendly atmosphere. This is being done where feasible.

A-DS8-1 Where single family detached residential units are provided, a variety of other housing types should be regularly interspersed along the street frontage. This infill project will help achieve adding in additional housing types to the area with the introduction of new mobile home options to increase density at an affordable rate.

E-GR4-1 Developments should incorporate reuse of viable existing structures. The proposed development contemplates reuse of the existing barn on site.

### **Standards Not Applicable**

## LAND USE

C-PS15-2 Improve options for affordable and nutritious food where not currently available. This is a residential development.

D-SP9-1 Encourage co-housing, shared housing environments, planned communities and accessory dwelling units for flexibility and affordability for senior adults and people with disabilities. The proposed development does not specifically cater to any type of demographic. However, it will be increasing the affordable housing options for all Lexingtonians.

E-GR9-1 Live/work units should be incorporated into residential developments. This is a residential development.

E-GR9-3 Less intense multi-family residence types should be incorporated into primarily single-family detached areas. This is not a multi-family development and is appropriately scaled for the area.

## TRANSPORTATION, CONNECTIVITY, AND WALKABILITY

C-PS10-1 Flexible parking and shared parking arrangements should be utilized. This is a residential development.

D-CO2-2 Development should comply with Lexington's Complete Streets Policy. We are not aware of any formalized Complete Streets Policy at this time. However, the proposed development is connecting to all existing stub streets and pedestrian infrastructure to provide safe access for existing residents and the proposed units.

D-CO5-1 Streets should be designed with shorter block lengths, narrower widths, and traffic calming features. This is being done where feasible, but there are several existing stub streets that are being proposed to connect that limits the ability to implement a true grid system.

## ENVIRONMENTAL SUSTAINABILITY AND RESILIENCY

B-PR2-1 Impact on environmentally sensitive areas should be minimized within and adjacent to the proposed development site. We do not believe that are any true environmentally sensitive areas on the site, but all detention basins are appropriately sized.

B-PR3-1 Minimize impact of development adjacent to land conservation properties through buffering. There is not a land conservation property adjacent to the site.

B-SU5-1 Developments should incorporate energy efficient systems and renewable energy resources (i.e. wind, solar, etc.). This is a residential development. Future individual property owners will have the ability to implement energy efficient systems and renewable energy resources during the unit selection process and upon moving in.

B-SU9-1 Green Stormwater Infrastructure (GSI) should be implemented in new development. The stormwater basins shall comply with any and all applicable regulations.

B-RE5-3 Developments within the Royal Springs Aquifer should consult with the Royal Springs Water Supply Protection Committee. This development is not within the Royal Springs Aquifer.

## SITE DESIGN

A-DS7-1 Parking should be oriented to the interior or rear of the property for non-residential or multi-family developments. This is being done where feasible, but the majority of the acreage involved is single-family units.

A-EQ9-1 School sites should be appropriately sized. There is not a proposed school site associated with this development.

D-SP1-2 School design should prioritize a high percentage of open and accessible street frontage. There is not a proposed school site associated with this development.

D-SP2-1 Visible, usable greenspace and other natural components should be incorporated into school sites. There is not a proposed school site associated with this development.

D-SP3-1 Adequate right-of-way, lease areas and easements for infrastructure, with emphasis on wireless communication networks should be provided to create reliable service throughout Lexington. There is no proposed wireless communication infrastructure proposed as part of this development.

D-SP3-2 Cellular tower antennae should be located to minimize intrusion and negative aesthetic impacts, and stealth towers and landscaping used to improve the visual impact from the roadway and residential areas. There is no proposed Cellular tower antennae proposed as part of this development.

BUILDING FORM

A-DS3-1 Multi-family residential developments should comply with the Multi-family Design Standards in Appendix A. This is not a multi-family residential development.

E-GR5-1 Structures with demonstrated historic significance should be preserved or adapted. There is an existing house and barn located on the Property, but there are not historic structures.

We will be at the July public hearing in order to make a complete presentation of this application and request your favorable consideration.

Sincerely,

Stoll Keenon Ogden PLLC

A handwritten signature in blue ink, appearing to read "N. Nicholson", is positioned above the printed name.

Nick Nicholson

NN:NN