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April 6, 2026

Via Hand Delivery:

Lexington-Fayette Urban County Planning Commission
200 East Main Street
Lexington, Kentucky 40507

RE: Letter of Justification in Support of Zone Map Amendment
Our Client: LCD Acquisitions, LLC
Affected Properties: 633 South Broadway - Parcel 10055568
416 Chair Avenue - Parcel 13496600
422 424 Chair Avenue - Parcel 16709250
426 Chair Avenue - Parcel 14921400
430 Chair Avenue - Parcel 15831000
436 Chair Avenue - Parcel 11606825
442 Chair Avenue - Parcel 14856200
441 Hayman Avenue - Parcel 10366000
451 Chair Avenue - Parcel 15001600

Dear Commissioners:

Please be advised that I represent LCD Acquisitions, LLC. (hereinafter “Landmark” or the “Applicant”). Landmark is a fully integrated real estate firm specializing in the acquisition, development, and management of high-quality residential communities. The company is a leader in the student housing industry and has consistently been ranked the most active student housing developer and largest student housing general contractor in the United States. Landmark currently boasts \$15 billion in supervised assets, encompassing over one twenty-two (122) residential communities nationwide with 75,000 beds under management.

Landmark is proud to enter the Lexington market and seeks to rezone 9 properties comprising approximately 5.047 acres located off of South Broadway near Oliver Lewis Way (collectively referred to herein as the “Property”). All of the properties except (633 South Broadway) are currently zoned I-1. 633 South Broadway is zoned B-4. Landmark is seeking to rezone the Property to a Corridor Node (“CN”) zone which “encourage[s] the development of high-density residential and mixed-use centers that are designed to complement existing and future public transit.” Zoning Ordinance Sec. 8-25. Only a portion of 441 Hayman Avenue will be rezoned to CN. Landmark intends to construct a high-density multi-family residential development consisting of 325 total units and 972 total beds (the “Development”). The

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Government Affairs: Frankfort

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Development is intended to alleviate the current student housing shortage affecting the University of Kentucky. We submit that this proposal is in complete accord with the adopted 2045 Comprehensive Plan and respectfully request your approval of our request.

1. Property History

The subject Property has historically been utilized for industrial purposes. The office located on the current B-4 zoned 633 South Broadway also supports an industrial use. In November 2022, the Planning Commission adopted the Newtown Pike Extension Corridor Plan (the “Plan”). The Plan “defines a vision for the collection of neighborhoods flanking the proposed extension of Newtown Pike.” See Plan, p. 1. The Plan acknowledges that “[h]ow demand for student housing will be met in the community at large is an issue that relates to portions of the planning area. To some extent, the Newtown Pike planning area is well located as a place for student housing.” See Plan, p. 58. In fact, planners contemplated that “[t]he University generates a market for housing, both for students and employees, which can produce demand for new housing in the planning area.” *Id.* at p. 64.

The subject Property is situated in close proximity to the historic Davistown area. Planners previously envisioned that “the western (lower) portion of the Davistown area is identified as the location of substantial redevelopment as an “urban village.” The intent was to “eliminate incompatible industrial uses and reframe the residential neighborhood around a park and community center.” Plan, p. 7. Planners further declared, “[p]hasing out industrial uses within some subareas is also recommended. These lands are now better suited for commercial and mixed-use development ... [p]roperties along the western edge of Broadway and south of the Newtown Pike Extension, are in this category.” Plan, p. 8. The “urban village” contemplated by Planners twenty-four (24) years ago has become a reality with the construction of new homes, a park, and community center in the Davis Bottoms Area. Approval of the Applicant’s request will further promote the goals and vision of the Plan as the now incompatible industrial uses will be converted to a more efficient high density residential development.

2. Compliance with the 2045 Comprehensive Plan

The Applicant submits that the Property is clearly situated within a Corridor place-type. “The overriding emphasis of Imagine Lexington is significantly overhauling the intensity of the major corridors. The future of Lexington’s corridors lies in accommodating the shifting retail economic model by incorporating high density residential and offering substantial flexibility to available land uses.” Imagine Lexington-2045 Comprehensive Plan, p. 269. In addition, we submit that the proposed development is appropriately classified as high density residential, recognized as a suitable development type in the Corridor place-type. *Id.*

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A. Goals and Objectives

Theme A – Growing and Sustaining Successful Neighborhoods

This proposal comports with Theme A of the Comprehensive Plan. In reviewing Theme A, we maintain that this development is consistent with the applicable design policies articulated, and is appropriately dense. We further submit that it meets the following goals and objectives articulated in Theme A:

Goal 1: Expand housing choices.

Goal 1 of Theme A of the Comprehensive Plan lists several objectives. Among them is the directive that we “[a]ccommodate the demand for housing in Lexington responsibly, *prioritizing higher-density and a mixture of housing types*” (emphasis supplied). This proposal emphasizes housing density in a responsible fashion that will respond to the need for additional student housing to serve the University of Kentucky and perhaps Transylvania University.

Goal 2: Support infill & redevelopment throughout the urban service area as a strategic component of growth.

Goal 2 of Theme A emphasizes that areas for infill and redevelopment should be encouraged. Objective a. then directs us to “*identify areas of opportunity for infill, redevelopment, adaptive reuse, and mixed-use development.*” This site falls within an area where infill and redevelopment is contemplated. The Applicant believes that it is identifying an area of our community suited for redevelopment, and can set a standard for responsible and appropriate development in the area. Moreover, Objective b. calls for developers to “[r]espect the context and design features of areas surrounding development projects and develop design standards and guidelines to ensure compatibility with existing urban form.” The Applicant’s proposed design meets this objective. In fact, an existing multi-family development (“The Lex”) is located in close proximity to the subject Property.

Goal 3: Provide well-designed neighborhoods & communities.

We believe this proposal addresses two of the objectives of Goal 3 of Theme A in a direct way. First, it will assist with providing various modes of transportation as an option. See Objective b. Because of its location, this site is ideal for individuals who may wish to walk or ride a bike to work or school, as it is in close proximity to the University of Kentucky and the urban core. It will also be in close proximity to a LexTran bus stop for those that would wish to utilize public transportation. In addition, the Project will ultimately “[i]mprove Lexington’s transportation network through ample street and sidewalk connections between new and existing development.” See Objective e.

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Theme B – Protect the Environment

We also submit that this proposal comports with goals and objectives articulated in Theme B of the Comp Plan.

Goal 2: *Identify and mitigate local impacts of climate 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.*

As previously noted, this proposed development is ideally located to reduce the need for reliance upon personal automobiles, and has even been designed in such a manner as to encourage walking and biking. There will be ample bike parking to further encourage environmentally safe transit. This is a key objective of Goal 2, Objective c. and d.

Theme D – Improving a Desirable Community

We further submit that this proposal comports with the goals and objectives articulated in Theme D of the Comp Plan.

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

We believe this proposal meets several of the objectives of Goal 1 of Theme D. We intend to interface with LexTran and remain committed to working with them so that the proposed development can be effectively served by public transit. This is in direct relation to Objective c of Goal 1. We also contend that the design and layout of the internal streets has created a seamless transition from the surrounding public streets to allow for safe and effective ingress and egress to the Development.

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.*

We submit that the Development is consistent with Objective a. of Goal 2 to “[e]nsure built and natural environments are safe and accessible through activated and engaging site design.” Since the Project will be targeted toward students, tenant safety and accessibility are top priorities in the design process. We also believe this proposal satisfies Objective b of Goal 2 in that the Applicant has “collaborate[d] with educational . . . entities to meet the needs of Lexington-Fayette County's residents and visitors.” Objective b. The Applicant will have the support of the University in that it seeks to alleviate the ever-rising need for student housing on and near campus.

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Theme E – Maintaining a Balance Between Planning For Urban Uses and Safeguarding Rural Land.

Finally, we submit that this proposal meets the goal of safeguarding rural land by providing needed housing units in an appropriately dense manner, thus reducing pressure on the Urban Service Boundary.

B. The Placebuilder

We have further evaluated our proposal under the design criteria set forth in the Placebuilder. In consultation with Planning staff, we submit that this proposal should be evaluated with reference to the Corridor Place Type, and that the proposed development is appropriately classified as High Density Residential. The following standards are applicable to Landmark’s proposal:

LAND USE

- A-DS12-1 Development should be located nearest to neighborhood serving commercial areas.
 - The Property is located within walking distance of numerous eating establishments, campus and is a short distance from the Euclid corridor that includes grocery and other commercial uses.
- A-DN2-1 Infill residential should aim to increase density.
 - This use seeks to increase density while also being respectful to the adjoining uses.
- C-LI7-1 Developments should create mixed-use neighborhoods with safe access to community facilities, greenspace, employment, businesses, shopping, and entertainment.
 - There is ample green space and community facilities within walking distance along Oliver Lewis Way and De Roode Street. Its location is also conveniently located close to commercial uses for employment and enjoyment.
- D-CO3-1 Development should increase density and intensity adjacent to transit.
 - There is currently the South Broadway at Hayman Avenue bus stop directly in front of the proposed development. The Red Line of the UK Bus Route also passes directly in front of the proposed development.
- D-PL7-1 Stakeholders should be consulted to discuss site opportunities and constraints prior to submitting an application.
 - A neighborhood meeting was held on March 6, 2026 and comments were received from the public prior to submission of this application.
- E-GR10-1 Transit oriented development (TOD) should be provided.

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- As mentioned, there are ample public transit stops in the near vicinity and bike and pedestrian oriented aspects will be incorporated into the development.

ENVIRONMENTAL SUSTAINABILITY AND RESILIENCY

- B-PR2-1 Impact on environmentally sensitive areas should be minimized within and adjacent to the proposed development site.
- There are no environmentally sensitive areas in the immediate area.
- B-PR10-1 Development should avoid overlighting and upward directed lighting.
- Lighting will be implemented so as to mitigate any impact on adjoining properties.
- B-SU11-1 Development should incorporate low impact landscaping and native plant species.
- The Applicant will incorporate landscaping in the appropriate areas.

TRANSPORTATION, CONNECTIVITY, AND WALKABILITY

- A-DS1-1 Mass transit infrastructure such as seating and shelters should be provided/enhanced along transit routes.
- The Applicant is speaking LexTran about potential additions in this area.
- A-DS1-2 Accessible pedestrian linkages to transit should be provided.
- As discussed, there is public and UK bus stops in the immediate area along South Broadway.
- A-DS4-1 A plan for a connected multi-modal network to adjacent neighborhoods, greenspaces, developments and complementary uses should be provided.
- Sidewalks along Chair Avenue provide safe multi-modal connections to Davis Park Station which provides ample greenspace. The Applicant will also include new sidewalks along the frontage of the Property.
- A-DS5-1 Safe multi-modal facilities should be provided to ensure vehicular separation from bicycles, pedestrians and other modes of transport.
- The vehicular parking areas will be appropriately designated and separated from pedestrians.
- A-DS10-1 New developments should incorporate clear and dedicated connections to nearby community anchors.
- Sidewalks along Chair Avenue, South Broadway and Oliver Lewis Way provide clear and dedicated connections to the surrounding commercial uses in the area.
- A-DS11-1 Street layouts should provide clear, visible access to neighborhood-focused open space and greenspaces.

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- Residents will be able to easily and safely access Davis Park Station.
- A-EQ5-2 Development should be transit-oriented (dense & intense, internally walkable, connected to adjacent neighborhoods, providing transit infrastructure & facilities).
 - As shown on the Development Plan, this development provides ample density while remaining walkable, internally and externally.
- C-PS10-1 Flexible parking and shared parking arrangements should be utilized.
 - The development will provide ample parking for residents.
- D-CO2-1 Development should create and/or expand a connected multimodal transportation network that satisfies all users' needs.
 - This development has ample and easy access to multiple modes of public transit.

SITE DESIGN

- A-DS7-1 Parking should be oriented to the interior or rear of the property for non-residential or multi-family developments.
 - Parking for this development will be to rear of this property and appropriately separated from the residential units.
- A-DS9-1 Development should provide active and engaging amenities within neighborhood focused open spaces.
 - Amenities within the development, and the surrounding community amenities, will further this design criteria.

BUILDING FORM

- A-DS3-1 Multi-family residential developments should comply with the Multi-family Design Standards in Appendix A.
 - The development plan reflects compliance with the Multi-Family Design Standards.
- A-DS4-2 New construction should be at an appropriate scale to respect the context of neighboring structures; however, along major corridors, it should set the future context.
 - This proposed development not only is appropriate in scale to neighboring structures, but is also setting the context for future development along South Broadway in this area. Further, the topography of this area will minimize any height concerns as it sits lower than other areas of South Broadway as you move away from downtown and the buildings will be appropriately stepped down in line this topographic change.
- A-DS5-3 Building orientation should maximize connections with the street and create a pedestrian-friendly atmosphere.
 - This development will make pedestrian use of the sidewalks along South Broadway easy and efficient.

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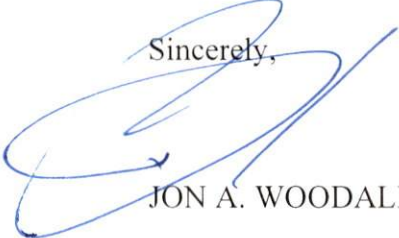
- A-DN2-2 Development should minimize significant contrasts in scale, massing and design, particularly along the edges of historic areas and neighborhoods.
- Given the location along the train tracks and other industrial uses in the area, this development is appropriate in scale and mass.

Conclusion

In sum, we submit that our proposal is in harmony with the 2045 Comprehensive Plan. We are anxious to present this project to the Planning Commission for consideration. In the interim, we look forward to our continued discussions with Planning Staff and the Commission. We humbly request your approval of the application submitted herewith.

Thank you in advance for your consideration.

Sincerely,



JON A. WOODALL