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October 2, 2017

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

**Re: Professional Office (P-1) Zone Text Amendment**

Dear Members of the Planning Commission:

The applicant, PWM Real Estate Holdings, LLC, requests a text amendment to Zoning Ordinance Section 8-15(o)(1) applicable to Professional Office Projects in the Professional Office (P-1) zone to allow Hotels as a principal permitted use. Currently, Extended Stay Hotels are allowed as a principal permitted use, this text amendment simply adds regular hotels to the similar use already allowed in a Professional Office Project.

This request is not truly adding a new use in the P-1 Zone as the requested use is the same as the allowed use – temporary occupancy of transient guests. This request only adds a use slightly less restrictive over what is currently permitted in Professional Office Projects. The Zoning Ordinance defines an extended stay hotel as “Multiple family dwelling(s) with rental or lease of less than one week, provided such rentals or leases of less than one week shall comprise less than 50% of the total dwelling units within the structure(s)” and a hotel as “A building or group of buildings containing individual sleeping or living units, designed for the temporary occupancy of transient guests; and including hotels, tourist courts, motor lodges, motor hotels or auto courts, but not including boarding or lodging houses.” The main difference between a Hotel and an Extended Stay Hotel can be broken down to the 50% requirement for a rental period lasting at least one week.

This request is in compliance with the existing Comprehensive Plan as well as the 2018 Goals and Objectives recently approved by the Planning Commission earlier this month. Both Goals and Objectives can be viewed as encouraging our community to find ways to aid in vacant and underutilized property development while ensuring we promote tourism and increasing the existing employment centers effectiveness while preserving the Bluegrass Region.

This text amendment will add a use focusing on tourism, business travel, and even job recruitment efforts without having an adverse impact on the unique Bluegrass landscape. It will allow for hotels to be located around those employment centers to focus on work travelers, potential employees, and even tourists regardless of their intended occupancy duration, while also providing basic amenities normal business and tourism travelers demand from their hotels, like food service, conference space, or lounge area not typical in extended stay hotels. In short, this proposal really gets at the heart of the Comprehensive Plan’s Theme C and enhances

Lexington's ability to attract potential employees and tourists alike while adding a feature to the surrounding employment center in professional office projects.

The Applicant recognizes a regular hotel's possible traffic impact is different than an extended stay hotel due to occupancy length. As such, Vision Engineering completed a Trip Generation Rate Comparison between the two uses and found a relatively small difference – especially during AM and PM peak periods. The hotel generally has 15-20% more trips than an extended stay business hotel throughout the day and only a 12% during peak hours. To put these figures into context, you are looking at approximately 6 more trips in AM-PM peak hours for a hotel with 75 occupied rooms over an extended stay hotel.

Land Use	Occupied rooms	Daily Traffic	AM Peak Hour	PM Peak Hour
Hotel	75	669	50	53
Extended Stay Hotel (Business Hotel)	75	545	44	47

A key point in this request is it only pertains to properties located in a professional office project, not every P-1 zoned property throughout Lexington. These projects require at least 10 contiguous acres zoned P-1. As such, these projects tend to be in the larger commercial activity areas such as Beaumont Centre, Corporate Center, Paragon Center, Hamburg, and St Joseph East. There are only 11 Professional Office Parks currently in town and average approximately 43.5 acres in size. Due to the typical surrounding uses and proximity to major arterials/collectors with a large office park, there is less concern any increased traffic or other unintended consequence would impact surrounding properties by simply allowing hotels without an occupancy time limit.

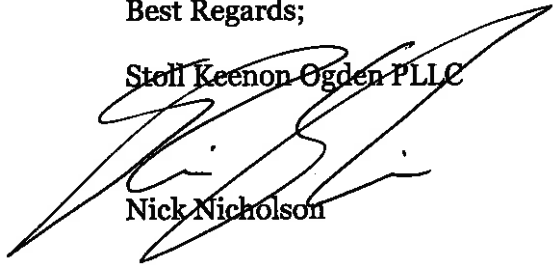
As the potential impact for the requested use is minor over the already allowed use, the Applicant feels any potential impact can certainly be mitigated through the typical Planning Commission methods such as zone-to-zone screenage or possibly a required distance from a residential zone on a case-by-case basis. We are open to discussing these possibilities with the Planning Staff throughout the application process.

The Comprehensive Plan charges LFUCG to give our community more tools to help craft solutions to our jobs need – this text amendment will be an excellent tool to aid the existing employers in professional office projects as well as a feature to attract additional jobs by fostering the Professional Office zone with needed travel infrastructure appealing to new employers. The proposed text amendment will provide a benefit to the diversified professional uses in professional office projects, without having an adverse impact in surrounding zones and will do so in a manner complying with both the letter and the spirit of the Comprehensive Plan and Zoning Ordinance governing professional office projects. For the foregoing reasons, the proposed text amendment is appropriate under the Zoning Ordinance, the Subdivision Regulations, and the Comprehensive Plan. The applicant, therefore, respectfully submits the text amendment described above is entirely appropriate and should be approved.

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Best Regards;

Stoll Keenon Ogden PLLC

A handwritten signature in black ink, appearing to read "Nick Nicholson", is written over the text "Stoll Keenon Ogden PLLC". The signature is stylized and somewhat illegible.

Nick Nicholson

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