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January 31, 2022

Mr. Larry Forester, Chairman  
Lexington-Fayette Urban Co Planning Commission  
200 E. Main Street  
Lexington, KY 40507

Dear Chairman Forester:

Earthcycle Design, LLC represents PropCo North Broadway, Lexington, KY, LLC which has filed a zone change application and an associated amended final development plan for property located at 2143 North Broadway in Lexington, Kentucky. The site is a single 7.1456-acre lot with a split Interchange Service Business (B-5P) / Planned Neighborhood Residential (R-3) zone. The property is bound by rights-of-way on three sides; Judy Lane to plan north, North Broadway to plan east and I-75/I-64 to plan south. Towards plan west, the property is adjacent to a vacant lot zoned Planned Neighborhood Residential (R-3).

**Goals and Objectives:**

We believe that our proposed development (the redevelopment of the existing building to be an assisted living facility) is in agreement with the 2018 Comprehensive Plan, specifically the Goals and Objectives that encourage the expansion of housing choices (Theme A, Goal #1); support infill and redevelopment (Theme A, Goal #2); provide for well-designed neighborhoods (Theme A, Goal #3); reduce Lexington-Fayette County's carbon footprint (Theme B, Goal #2); support the creation of jobs and prosperity (Theme C, Goal #2); work to achieve an effective and comprehensive transportation system (Theme D, Goal #1); work toward an urban and rural balance (Theme E, Goal #1); and more specifically, accommodate the demand for housing in Lexington responsibly, prioritizing higher-density residential and a mixture of housing types (Theme A, Goal #1, Objectives b & c and Theme A, Goal #2, Objectives a & c).

**Engagement:**

The project team met with representatives of the Joyland Neighborhood Association via zoom meeting (due to the ongoing COVID-19 pandemic) on January 26, 2022 to discuss the proposed development and zone change request prior to filing the application with the Division of Planning. In addition to James Vogel with PropCo North Broadway Lexington, KY, LLC, Scott Southall and Denise O'Meara with Earthcycle Design, and Jerry Herndon & Randall Barrett with Affinity Design Group, and Hal Baillie, Senior Planner with LFUCG Division of Planning attended the meeting. Approximately 10 individuals from the Joyland Neighborhood participated in the meeting. Mr. Vogel provided an overview of the proposed redevelopment and the program elements and services associated with the assisted living facility. The neighbors asked a few questions regarding the existing building and infrastructure. The team summarized the building and site components that will be removed, renovated, or remain. A few individuals raised concerns regarding traffic on Judy Lane and the proposed entrance onto Judy Lane from the facility. Other questions regarding the project included: proposed water quantity projects in the

neighborhood and the proposed expansion of I-75/I-64. The design team indicated they would follow up with LFUCG staff on the questions asked during the meeting.

**Site Description:**

The subject site is located between a major corridor and a mixed-use neighborhood that currently includes single family residences, duplexes, and planned neighborhood residential of various densities. The surrounding neighborhood also includes retail stores, a service station and restaurants along North Broadway. To plan north and east are single family and duplex housing along with a number of places of religious assembly. Since the late 1960's the subject property has been utilized as a hotel with center exterior courtyard and parking lots surrounding the wings of the building.

**Place-Type, Development Type & Requested Zone:**

The Placebuilder defines seven place-types within the Urban Service Area boundary. This location is an Enhanced Neighborhood place-type, which is defined as:

*An existing residential area to be enhanced with additional amenities, housing types, and neighborhood serving retail, services, and employment options. Development should be context sensitive to surrounding areas and should add to the sense of place. Incorporating multimodal connections is crucial to neighborhood success and viability. (page 266)*

Further, the Enhanced Neighborhood place-type identifies low, medium, medium/high density residential as well as and low density non-residential / mixed-use land use within the place-type. The most appropriate place-type for the site is the Enhanced Neighborhood because of the context of the site: the majority of the site fronts a neighborhood collector road; the proposed development provides mixed housing types; provides connections to multi-modal network; and the existing building offers a context sensitive development to the neighborhood. In addition, the applicant selected medium density residential as the most suitable development type for the site. We believe that the immediate area is well-served with corridor retail, restaurants and community facilities; however, we can increase the availability of housing type options within the neighborhood with this redevelopment project. The proposed facility will have an added economic impact to area businesses.

The Placebuilder also recommends the following potential zoning categories that align with the proposed Enhanced Neighborhood place-type: R-3, R-4, MU-1, MU-2 and B-1 zones. The zone that most closely aligns with the applicant's vision for the site is the planned neighborhood residential (R-3) zone. The subject site is currently located in a split Interchange Service Business (B-5P) / Planned Neighborhood Residential (R-3) zone, and the applicant is proposing to re-zone the remaining portion of the Interchange Service Business (B-5P) to a Planned Neighborhood Residential (R-3) zone in order to match the balance of the parcel's zone. This zone change along with the conditional use permit will allow the property's redevelopment for an assisted living facility, which is a recommended zone for medium density residential in the Enhanced Neighborhood place-type.

The proposed plan utilizes the existing building footprint to accommodate 134 assisted living units. A small (20'x25') building addition will be added between Wing B and Wing C for secondary point of egress to the building,

elevators, and mechanical service. Since the number of units will exceed 100, per request by LFUCG a secondary point of egress to the site has been proposed along Judy Lane across from the intersection with Circle Drive. This proposed entrance location will become the primary entrance to the property in keeping with the residential atmosphere for the project. The existing egress point from the shared service drive from North Broadway will be gated for emergency use only. Sidewalks from Judy Lane and North Broadway to the building's front door will be constructed to provide connectivity to the surrounding neighborhood.

The proposed assisted living facility will be an affordable private pay establishment targeting the middle-income market. Based upon the 134 units proposed for the redevelopment, this represents a density of 18.91 dwelling units per acre. In addition to the residential units, the assisted living facility will include space for physical & occupational therapy, a renovated indoor pool for aquatic therapy, a hair salon and dining room, all for the residents. The general public will not have access to these amenities on the property.

The property grounds will also undergo an extensive renovation with removal of impervious parking areas and pavement, increase in canopy trees and retrofit of the exterior courtyard area for the residents. The redesign of exterior courtyard as a therapeutic outdoor environment will provide residents and guests an opportunity to engage the outdoors in a safe and secure setting. The reduction of impervious pavement, combined with the addition of canopy and flowering trees, will reduce the stormwater runoff from the site. This stormwater volume and flow reduction will aid in the downstream stormwater mitigation efforts for the Joyland Neighborhood.

The applicant understands the vision of the community, as outlined in Imagine Lexington: The 2018 Comprehensive Plan. The mission statement, goals and objectives, and the Placebuilder are furthered by the applicant's proposed redevelopment of the property and believe that the request is in agreement with the Comprehensive Plan for the following reasons. Based upon the context of the site location, the applicant believes the site most closely aligns with the Enhanced Neighborhood place-type. We believe that the proposed Planned Neighborhood Residential (R-3) zone is in agreement with the place-type definition, is a suitable development type and matches the balance of the existing property zone. The Planned Neighborhood Residential (R-3) also, agrees with one of the recommended zones, as established by Placebuilder for Enhanced Neighborhood.

**Development Criteria:**

To further address the Placebuilder development criteria, the design team has prepared an annotated graphic of the proposed development plan. However, additional development criteria deserve further explanation, and the information on the following pages show that the requested zone change agrees with the Comprehensive Plan. The following design standards are being met, and are annotated on the development plan:

<i>Site Design, Building Form &amp; Location</i>	<i>Transportation &amp; Pedestrian Connectivity</i>	<i>Greenspace &amp; Environmental Health</i>
A-DS5-3	A-DS1-2	A-DS4-1

B-SU11-1	A-DS5-1	A-EQ7-3
C-L16-1	A-DS5-2	B-PR7-1
C-PS10-3	B-SU4-1	B-PR7-2
	D-CO1-1	B-PR7-3
	D-CO2-1	E-GR3-1
	D-SP1-3	

In addition, the following information supports our assertion that the proposed zone change is in agreement with Imagine Lexington: The 2018 Comprehensive Plan.

<i>Site Design, Building Form &amp; Location</i>	
A-DS3-1	<p><i>Multi-family residential developments should comply with the Multi-family Design Standards in Appendix 1.</i></p> <p>The applicant intends to meet the multi-family design standards as the standards apply to the redevelopment of the proposed adaptive reuse of the existing building and grounds. The final development plan annotates the proposed site improvements related to the Multi-Family Standards. The following outlines the existing site and building elements or proposed improvements included in this redevelopment project:</p> <p>Site Planning:</p> <ul style="list-style-type: none"> <li>• The proposed primary site entrance at Judy Lane strengthens the connection to residential street frontage in combination with the sidewalk connections for continuity. (SP.1)</li> <li>• The proposed plan envisions multiple secure ground level access points as a part of the renovation including enhanced access to the exterior courtyard. (SP.2)</li> <li>• The proposed Judy Lane entrance will enhance the sense of arrival to the property and define the property as a part of the residential neighborhood. (SP.3)</li> <li>• The existing building setback will be maintained with the redevelopment. (SP.4)</li> <li>• Sidewalks are proposed to connect from the front door to existing sidewalks along Judy Lane and North Broadway. (SP.5)</li> <li>• As a part of the proposed project, the exterior courtyard will undergo an extensive renovation. Pedestrian connections from each building wing will be made or enhanced based on universal design principles. (SP.6)</li> <li>• Proposed site improvements include the removal of over 100 parking spaces and drive lanes. Landscape islands and areas will replace the impervious areas thus reducing the physical and visual impacts of the remaining parking lots. (SP.7, SP.8)</li> <li>• With the removal of parking spaces, drive lanes and privacy fences, residents at the future assisted living facility will have</li> </ul>

	<p>visual and physical access to the open spaces surrounding the building wings. (SP.9)</p> <ul style="list-style-type: none"> <li>• The proposed development plan annotates multi vehicular and pedestrian connections to the surrounding rights-of-way. (SP.10)</li> <li>• Renovation of the site will include replacement and upgrade of the existing site lighting with energy efficient LED directional lighting. (SP.15)</li> <li>• The proposed redevelopment will employ universal design principles to the maximum extent practical. (SP.16)</li> </ul> <p>Open Space &amp; Landscaping:</p> <ul style="list-style-type: none"> <li>• As noted in the site planning section, the proposed site renovations will include physical and visual connections to open spaces on the property. (OS.1)</li> <li>• The renovated central exterior courtyard defined by the existing building’s three wings will provide physical access for all residents. (OS.2, OS.3)</li> <li>• A new landscape planting will be implemented as a part of this proposed project to differentiate and define public, private and intimate outdoor spaces. (OS.4)</li> <li>• Canopy and flowering trees will be installed in newly created landscape islands. (OS.5)</li> <li>• Enhance perimeter landscape screening will be a part of the proposed redevelopment. (OS.6, OS.7)</li> <li>• Universal design principles will be the goal for all accessible routes. (OS.9)</li> <li>• Proposed landscape will help to create a sense of arrival and define the building entry points. (OS.11)</li> <li>• New site lighting will be a part of the redevelopment project. (OS.12, OS.13)</li> </ul> <p>Architecture Design:</p> <ul style="list-style-type: none"> <li>• The proposed project will use the existing building’s mass and form for the renovation. The building’s vertical height and form is integrated into the existing topography, thus reducing the over impact on the surrounding neighborhood. The existing building is divided into wings to break up the overall building façade and massing. (AD.1, AD.2, AD.3)</li> <li>• The existing building provides windows at each proposed housing unit. Additional fenestration may be introduced during the renovation design. (AD.4, AD.5)</li> </ul>
A-DS5-4	Pedestrian connectivity will be included in the redevelopment of the property.
A-DS7-1	Existing parking lots for the proposed redevelopment have been reduced or removed with an increase in landscape islands to further reduce the

	physical and visual impacts of the parking lots, as well as improve stormwater management.
A-SD7-2	The existing parking lots will have added landscape screening to reduce the visual impact from the streetscape and neighborhood.
A-DS10-1	The proposed redevelopment will include focal points within the exterior courtyard.
A-DN2-1	The proposed redevelopment of the subject property will increase the residential density.
C-L17-1	The proposed zone change will increase the diversity of the neighborhood by providing housing opportunities for a new area demographic.
C-PS10-2	Existing parking lot capacity has been reduced in order to right size the parking requirements versus supply. Additional sharing of parking spaces could be explored for surrounding businesses.
D-PL7-1	A public zoom meeting was held on January 26, 2022 to engage with the surrounding neighborhood association.
D-SP9-1	The proposed development will provide housing for senior adults in an assisted living environment.
E-GR4-1	The proposed development will utilize most of the existing building and grounds in this redevelopment project.
E-GR9-4	The proposed development will increase the use intensity of this underutilized property.

Since this proposed project is an adaptive reuse of an existing building and site, a number of the Placebuilder development criteria are not applicable to the proposed zone change. Those are listed below, along with a brief explanation of why they are not pertinent to proposed redevelopment of the building and/or the site.

Site Design, Building Form & Location	
A-DS4-2	The proposed project will redevelop the existing building with exception of a small addition for elevators and service.
A-DS7-3	No parking structure is proposed for this redevelopment project.
A-DS8-1	The proposed project will redevelop the existing building for housing. No additional free-standing housing unit are not proposed
A-DS11-1	No common public space is proposed for this redevelopment project.
A-DN2-2	The proposed project will redevelop the existing building and the building scale, massing and design will not be significantly altered.
A-DN3-2	The proposed project will redevelop the existing building and therefore no additional commercial centers will be included.
A-DN6-1	The proposed project will redevelop the existing building. No other housing types are proposed for the project.
A-EQ7-1	No school site is proposed with the project.
B-PR9-1	No existing environmentally sensitive areas have been identified on the property.
C-L16-2	No single-family dwelling units are proposed for this project.
D-PL7-1	No identified historic structures are on this property.
D-PL10-1	No public streets will be created with this project.

D-SP3-1	No additional easements will be required with this project.
D-SP3-2	No cellular tower antennae will be required with this project.
E-GR5-1	No identified historic structures are on this property.
E-GR9-1	The proposed redevelopment will be structured for assisted living units.
E-GR9-3	The proposed redevelopment is for assisted living housing.

Transportation & Pedestrian Connectivity	
A-DS1-1	The proposed redevelopment project has limited right-of-way frontage along North Broadway for transit infrastructure.
A-DS4-1	The proposed redevelopment project is limited to a single parcel. Sidewalk connectivity has been added from rights-of-way to the property's front door.
A-DS10-2	The proposed redevelopment project has limited right-of-way frontage along North Broadway and limited ability to provide a multimodal focal point.
A-DS13-1	The proposed redevelopment project has no stub street adjoining the property.
D-CO1-1	The proposed redevelopment project has limited right-of-way frontage along North Broadway and limited ability to provide a multimodal focal point.
D-CO4-1	No dead-end streets or cul-de-sacs are proposed for this redevelopment project.
D-CO4-2	No additional road capacity is anticipated for this redevelopment project.
D-CO4-3	No additional right-of-way is anticipated for this redevelopment project.
D-CO5-1	No additional right-of-way improvements are proposed with this redevelopment project.
D-SP6-1	No public social services or community facilities are proposed with this redevelopment project.

Greenspace and Environmental Health	
B-PR2-1	For this redevelopment project, no environmentally sensitive areas have been identified.
B-PR2-2	For this redevelopment project, no floodplain is located on the property.
B-PR2-3	For this redevelopment project, no floodplain is located on the property.
D-SP2-1	For this redevelopment project, no school site is provided.
D-SP2-2	For this redevelopment project, no school site is provided.
A-DS10-2	The proposed redevelopment project has limited right-of-way frontage along North Broadway and limited ability to provide a multimodal focal point.
A-DS13-1	The proposed redevelopment project has no stub street adjoining the property.


D-CO1-1	The proposed redevelopment project has limited right-of-way frontage along North Broadway and limited ability to provide a multimodal focal point.
D-CO4-1	No dead-end streets or cul-de-sacs are proposed for this redevelopment project.
D-CO4-2	No additional road capacity is anticipated for this redevelopment project.
D-CO4-3	No additional right-of-way is anticipated for this redevelopment project.
D-CO5-1	No additional right-of-way improvements are proposed with this redevelopment project.
D-SP6-1	No public social services or community facilities are proposed with this redevelopment project.

**Conclusion:**

We ask, on behalf of the applicant, that the Planning Staff and Planning Commission favorably consider the proposed zone change and its relationship to fulfilling the mission, goals, objectives and policies of Imagine Lexington: The 2018 Comprehensive Plan. The applicant will implement the proposed redevelopment to enhance the quality of space in the Joyland Neighborhood. Thank you for your consideration of our proposed zone change and we look forward to presenting our case in full at the public hearing on March 26, 2022. We will be pleased to answer any questions about our proposal between now and the public hearing.

Sincerely,

earthcycle design llc



B. Scott Southall, PLA, ASLA, AICP, LEED AP BD+C  
Principal  
Project #22-0001