

April 1, 2019

Mr. Jeff O'Brien  
Deputy Director, Office of Advanced Planning  
Metro Development Center  
444 South 5<sup>th</sup> Street, Suite 600  
Louisville, KY 40202

Dear Jeff,

I have reviewed the South Floyds Fork Vision Plan, and this letter is my formal response.

Cities grow best when infrastructure investments lead, rather than follow, new development. While most recognize this fact in regards to roads, or sewers, or power lines, they usually do not recognize it for "soft" infrastructure such as parks and open space. Frederick Law Olmsted, Sr. set the precedent for this when he inserted Central Park (and later other parks) into the middle of New York City's famous street grid, one of the most effective urban plans in history. Despite the fact that the location for Central Park was 30 blocks north of the edge of the city in the 1850's when it was built, he had the temerity to name it Central Park, a long-term vision of its city-shaping role in making New York a livable city. This core principle – that parks are city-shaping infrastructure, in the same fashion as roads or sewers, and that any true urban vision should include them as an intentional part of its planning, represents one of the most important, but least understood and applied, lessons from Olmsted's work and writings.

In the 1890's, Olmsted, Sr. brought this same vision to Louisville, where he laid out the three major sites of Louisville's first park system – Shawnee, Iroquois and Cherokee – along with a series of connecting parkways. Derided as follies because they were so far beyond the edge of the city, today they are urban parks that shape our city and our landscape by enhancing community and environment, improving health and recreation, while serving as the major anchor of Louisville's unique neighborhoods—so important to sustaining our economy and quality of life.

In addition, Olmsted planned carefully the interface between his parks and the city that would grow around them. Olmsted did not oppose development, rather he wanted to assure a well-designed connection with the neighborhood forms of his day. For precisely these reasons, in 2004, 21<sup>st</sup> Century Parks incorporated to renew this vision of intentional, proactive park development to shape Louisville's fast-growing urban edge in the 21<sup>st</sup> Century. Integrating world-class park planning and design that combines nearly 4,000 acres of preserved land with the design of a 20-mile long Olmstedian park system that cuts through the last big undeveloped part of a Top 50 metro area, Louisville has an opportunity granted to no other American city at present.

Olmsted's key emphasis on park infrastructure, and the infrastructure of the interface between park and surrounding neighborhood development, defined the heart of his approach. Using Cherokee Park as an example, one can experience the continuum from the core park with its beautiful pastoral design, the interface with its boundary roads and the amazing gateway at The Cherokee Triangle, and then the remarkable diversity in neighborhood form that ranges from high-rise to low rise multifamily, from bungalows to ranch houses, and from the traditional street grid on the west to the more modern curvilinear roads in Cherokee Gardens and the other neighborhoods around Seneca Park. By getting the core infrastructure right—park and boundary interfaces—the design sustained itself through many phases of market housing.

While the South Floyds Fork Vision Plan notes the Olmstedian legacy, it shifts the focus to preserving the present landscape, rather than growing a sustainable new urban edge. A summary of our

concerns about the plan are detailed below. *We do not support the plan in its current form, but provide constructive comments towards a plan we could support.*

### **South Floyds Fork Vision Plan—Overall concerns:**

The plan is too long, too general, ignores the parklands and its interface, and creates a false impression of the scarcity of agriculture and natural areas by stopping at the county line. It also creates a series of mandates that will preserve the current landscape in place and potentially drive development to surrounding counties, or create other unintended consequences, a dubious environmental outcome, and a seriously misplaced economic outcome given the city's need for new revenue. Most importantly, it ignores the singular opportunity to grow our city again around world-class parks, as we did a century ago with the Olmsted system. Doing so requires a more focused approach to design and infrastructure investment, a quality interface with The Parklands of Floyds Fork (TPFF), and a set of design tools that provide flexibility in neighborhood design.

### **Our general recommendations are as follows:**

- First, recognize the significant realities that make this region so important and develop a vision around those realities. These are:
  - The significant growth trajectory presented in your research, and in public input.
  - The singular nature of The Parklands of Floyds Fork, and the opportunity it presents for Louisville.
  - That the landscape surrounding The Parklands has the potential to *achieve* the quality advocated in the current plan, but only through careful planning and specific investments.
- Second, limit the core focus of the study to areas the plan's research and public input demonstrated as important, and which are reasonably within the 20-year vision of the 2040 Plan: the Taylorsville Road/Taylorsville Lake Road corridors, the Fern Creek area, and the area between The Parklands and the Gene Snyder Freeway. A specific focus on these areas in terms of planning and infrastructure investment is more efficient, and will focus growth closer to the city.
- Third, focus on a set of tools rather than mandates, using and strengthening current planning and zoning codes already in place, and present a plan for the interface between surrounding development and The Parklands.
- Finally, restate the Vision around these themes. We suggest something like the following: *"The South Floyds Fork Area consists of tens of thousands of acres on the fast-growing edge of a Top 50 Metropolitan Area, with Floyds Fork creek forming the major geographic focus, and its north-south spine. The nearly 4000-acre Parklands of Floyds Fork incorporates and preserves much of the creek, will shape the pattern of growth, and its long-term conservation plan will create high quality habitat while preserving significant agricultural landscapes. Its emphasis on quality has set the standard for future design and planning in this evolving area. Current demographic trends, as defined in the South Floyds Fork Vision Study, indicate continued growth in the area. The 20-year Vision for the South Floyds Fork Area is to capture the potential of the area with a smart, well-designed plan that provides for connectivity, draws growth closer to the edge of the city using smart infrastructure investments and planning, while preserving, restoring, and enhancing the natural and aesthetic qualities of the area."*

### **Specific edits to the current plan:**

- **Acknowledge this Area's Growth Trajectory and Demographics:** acknowledge what your heat map shows—that the major growth areas are the Taylorsville and Taylorsville Lake Road corridors, The Bardstown Road corridor, and between TPFF and The Gene Snyder Freeway—and plan for *specific* improvements in those areas, rather than the vague, generalized goals and planning

outcomes currently presented. Limit infrastructure investments to these areas. This will focus and contain growth and allow for quality improvements. *Limiting growth by expanding investment adjacent to current infrastructure will do more than anything else to preserve the rural character at the further edges of the county.*

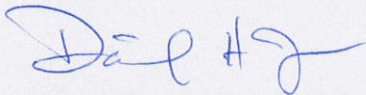
- Example: The Taylorsville Road and Taylorsville Lake Road corridors
  - Specifically identify the roads that need improvements, limit the improvement area to just a couple of miles beyond the current urban edge, and present a parkway design standard. This will limit development to the zone of infrastructure investment (thus providing for the preservation of rural lands and habitat further out), be far more efficient in terms of economic investment, and far more environmentally friendly.
  - Incorporate the Parklands Parkway from our master plan, and create appropriate, consistent design standards.
  - Create a sewer plan for this area, again, to be focused on just the next limited zone of development, instead of the vast zone presented in the current plan.
  - Create a specific road and bike trail plan that connects Taylorsville Lake Road and areas of new development to TPF through one or two existing road corridors, but with an enhanced design standard for those corridors.
  - Locate general areas for future neighborhood park development.
  - Apply similar principles for other infrastructure and the other two major areas of investment (Fern Creek and the zone between TPF and The Gene Snyder).
  
- **Elevate the Focus and Importance of The Parklands and The Interface Between The Parklands and New Development:** Create design standards, and use existing zoning and planning tools, as well as a clearly defined Design Review Overlay (DRO), that provide for the following (already adopted into Cornerstone 2020 with our original master plan), by restoring The Parklands as the major planning tool for this area through:
  - The creation of park boundary roads with design standards.
  - The creation of linkages from private developments into The Parklands for vehicular, bike, and pedestrian access for neighborhood access, in locations that are appropriate to the park plan.
    - This can and should include a “greenways” plan along major stream corridors with a specific design standard for environmental planning as well as pedestrian and possibly bike access.
  - Minimize the impact on viewsheds while offering visual examples.
  - Require street tree plans for neighborhood development.
  - See “The Neighborhood Plan” section of 2020 document for other specific directions.
  - In addition to these broad concepts, there are several specific areas of focus:
    - Shelbyville Road to Taylorsville Road: Use Echo Trail as a boundary road. Acknowledge the new I-64 interchange while creating a boundary road standard for new development, including trail connections and tree planting requirements for new subdivisions.
    - The Strand:
      - Focus on agricultural preservation for major farms along The Strand
      - Create standards for tree preservation on steep slopes and ridgetops, while allowing for some clearing to facilitate views for ridgetop development (similar to Cherokee Park)
  
- **Utilize Existing Tools Rather than Creating a Complex Set of New Ones:** Rather than create a whole suite of new tools, utilize existing tools more effectively.
  - For example, maintain the current stream buffer standard, but add standards for the maintenance of those buffers in an ecologically positive fashion. A buffer alone does not

guarantee environmental quality; rather, it's the buffer standard and its actualization that matters.

- Utilize the existing DRO more effectively to set preferred design standards, and to offer a deeper level of review. By focusing review on areas that really need it (especially the interface with The Parklands and steep slopes along the creek), developers, neighbors, and 21<sup>st</sup> Century Parks, will have deeper input into the critical issues for specific parcels, rather than a cookie cutter approach.
- Maintain current floodplain/floodway and steep slope guidelines, but again, be more specific about how those areas can be improved from an environmental or viewshed perspective. Aligning these with the DRO will allow the additional review required to work thru site-specific issues.
- We have done more extensive work on environmental restoration in this area than any other organization and understand clearly the issues and the challenges. More focused zones of improvement (such as existing stream buffers), with more specific outcome goals, will do far more to enhance ecological quality in this area than broad mandates with no specified environmental outcomes.

**Conclusion:** By keeping the focus on growing our city efficiently through infrastructure investments at the next ring of growth *as indicated in the plan's clear demographic research and public input*, allowing flexibility and choice in neighborhood form, and applying existing regulations in ways and areas that support environmental quality, the city will more effectively balance growth with great design, and take advantage of the opportunity presented by The Parklands to create the finest urban edge in America. Rather than just a general acknowledgement of the Olmstedian vision and process, actually develop the tools to make it a reality. The first phase—the creation of The Parklands—is largely complete, and it is now time to harness the parks to develop a truly unique urban edge that integrates growth and development with the preserved natural areas of the parks. We've done it before and can do it again!

Sincerely,



Daniel, H. Jones, M.F., Ph.D.  
Chairman and CEO, 21<sup>st</sup> Century Parks, Inc.