

Southcenter Comprehensive Plan Chapter Issues Matrix

- Note that comments listed without an exhibit reference were delivered verbally during the public hearing.

Page # in Plan	Comment (language changes in strikethrough/underline, recommendation in bold)	Exhibit #/ Date/Source	Staff comment/analysis/options
Goal 10.2, p.11	Development should be done in an environmentally sustainable way.	Alford PC mtg 11.10.11	Staff Recommendation: Revise policy as follows: "... Throughout Southcenter, the natural and built environments area attractive, functional, environmentally <u>sustainable</u> , and distinctive, and support a range of"

Southcenter Subarea Plan - Issues Matrix

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p. 15 1.4	Regional Center language is less strong than other districts, should be strengthened.	Alford 8/23/12 Hearing	Staff Recommendation: See proposed revisions
Districts	Need to come up with a different name for Workplace District. Everywhere in SC is a workplace. Need something more evocative - WH/LI?	McLeod PC mtg 6/28/12	PC Comments: Call this Warehouse instead - McLeod. The Boardwalk @ Southcenter (Pond District) - Mann. Look at renaming/rebranding the whole area for marketing purposes - Mann.
Tukwila Pond/Open Space	Plan should call for the expansion of Tukwila Pond Park southward. SC needs an amenity on the scale of the park in downtown Bellevue. Such an amenity would be a strong attractor for the types of development envisioned by the community.	McLeod PC mtg 6/28/12	The Plan does discuss the value of the Pond as an amenity (p. 4 intention 8, p. 16 district discussion) but improvements are focused on the north side esplanade and loop trail rather than expansion. PC Comments: To be successful, need to have destinations and Pond is the most exciting part of the plan. - McLeod Want to start even if small - Mann Are there any incentives for redevelopment - ?
p. 25	The Southcenter Subarea Plan (page 25) refers to a "road diet", on Andover Park East and Baker Bl. to provide on-street parking and bike lanes. How will this "road diet" and thoroughfare reconfiguration affect the level of service on Andover Park East, Baker Boulevard, Strander Boulevard, Andover Park West, and West Valley Highway?	Strander 9/10/12 Email	The road changes discussed in the Subarea Plan reflect recommendations adopted in the Walk and Roll Plan in 2009 (Ord. 2222). These sections of Andover Pk E and Baker have been identified in our traffic modeling as having capacity for the reconfiguration, though a Traffic Impact Analysis would be required to determine whether or not the "road diet" would create (or exacerbate) roadway congestion or level of service problems elsewhere in the roadway system prior to making changes.
p. 44	Who will pay for the parking structure feasibility study mentioned in the Short Term Actions and how much will it cost? Remove the word shall from: The City shall <u>may</u> prepare a study investigating the overall feasibility...	Strander 8/23/12 Hearing; Strander 9/10/12 Email	Funding has not been identified. We could seek grant funding or use City funding if we looked at it as a catalyst project. Staff recommendation: Revise as suggested
p. 48 1.6.3 1)	Change the sentence to read: The City shall pursue the development of a rubber-tired trolley route connecting Sounder Tukwila Station with other activity areas...	Shumate 8/23/12 Hearing	Staff recommendation: Revise as suggested

TMC 18.28 TUC District Zoning Regulations - Revised Issues Matrix

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Page # in Plan	Zoning Code Comment (language changes in strikout/underline, recommendation in bold)	Exhibit #/ Date/Source	Staff comment/analysis/options
P. 3	18.28.020 How to use the development code. Staff recommends edits that clarify how the Corridor standards are applied. Edits do not change the meaning or intent of the regulations.	Staff edits	Staff Recommendation: Revise 18.28.020.B.4.a. as follows: "Thoroughfare configuration, public frontage conditions, building and parking placement, front yard landscaping, and architectural aspects of <u>that portion</u> of a building's façade within the first 185 feet of a parcel, measured from the curb line. See the Corridor Type Charts, Figures 3-10."
p. 4	TMC 18.28.020.C. Design review thresholds. Should raise the threshold under which residential development is reviewed administratively from 20 dwelling units to 30 dwelling units (50 in Exhibit 7). This is more representative of the type of multifamily project that will initially be proposed in SC. Raising the threshold will be an incentive for small-scale multifamily development. Increasing threshold will encourage the development of small cluster residential units near transit.	Ex. 6, 7, 9; PC mtg 6/28/12, Open House; Jamie Durkin	Current standards require all multi-family development to go through public hearing design review so raising the threshold to 20 is already a significant streamlining of the process. The tradeoff is having a faster processing time (admin review) versus community interaction in the process (BAR review). Staff Recommendation: No change PC Comments 8.23.12: Ok to go higher since projects would not be near single family areas - Mann, McLeod, Strander
p. 4, 18.28.020.C.1.b.(1)	Revise the third bullet under (1) to read: "Any exterior repair, reconstruction, cosmetic alterations or improvements, when the cost of <u>that work</u> exceeds ten percent (10%) of the building's current assessed valuation."	Ex. 1; 6.25.12; Letter from Brent Carson (VanNess Feldman GordonDerr)	Staff recommendation: Revise as suggested to match current language. Make similar change to 18.28.20.C.2.a.(1) second bullet and 18.28.20.C.2.b.(1) second bullet. PC Comments 8.23.12: In favor of loosening thresholds for building repairs and updates - Mann
p. 4	Is it the intent to exempt repairs and maintenance for existing buildings that may trigger a design review? If so, where does the code expressly state this?	Strander 9/10/12 Email	No, exterior changes count toward the 10% threshold as they do now. See p. 4.
p. 4 18.28.020 C	Segale is concerned about the low threshold for applying the new regulations to improvements to non-conforming uses. The current approach has the potential to impose tens or hundreds of thousands of dollars of improvements on a landlord who simply wants to improve the space for a new tenant. For example reroof of a strip commercial building could exceed 10% of the building value triggering design review and the following:	Ex. 11; 8/23/12; Balint for Segale	The threshold for triggering design review has been the same since design review was first implemented in Tukwila. The Plan would expand the project types eligible for the streamlined administrative review process. It is unclear if this example is purely a reroof or if there is a change in use contemplated for the "new tenant." However, repairs to a roof that is not visible from a street, parking lot or sidewalk, and therefore will not have any impact on the building design, should be exempted from the design review threshold calculation. Staff Recommendation: Pg. 4, 18.28.020.C.1.b.(1), 3rd bullet Revise as follows: "Any exterior repair, reconstruction, cosmetic alterations or improvements, when the cost of <u>that work</u> exceeds ten percent (10%) of the building's current assessed valuation (<u>the cost of repairs to or reconstruction of roofs screened by parapet walls is exempt</u>)." Pg. 4, 18.28.020.C.2.a.(1), 2nd bullet and 18.28.020.C.2.b.(1), 2nd bullet Revise as follows: "Any exterior repair, reconstruction, cosmetic alterations or improvements to buildings over 10,000 square feet, when the cost exceeds ten percent (10%) of the building's current assessed valuation (<u>the cost of repairs to or reconstruction of roofs screened by parapet walls is exempt</u>) shall be reviewed administratively as a Type 2 decision (see TMC Chapter 18.60)
	- Parking		Per existing standards at 18.70.080 parking conformance is triggered by a change of use or addition that requires additional parking, the reroof and design review are irrelevant. In addition the proposed parking standards are lower than the existing code so even a change of use may not require additional parking.
	- Landscaping		Per existing standards at 18.70.090 Design review does trigger landscape conformance. The proposed landscape standards are similar to the existing standards and the BAR is explicitly given flexibility to adapt them for existing sites so hardship is minimized. In the past the BAR has demonstrated a great deal of flexibility and common sense during design review on existing structures.
	- Private Frontage and Building Placement which could potentially require the entire building to be relocated		Only the Walkable Corridor and Tukwila Pond Esplanade have frontage coverage and maximum front yard setbacks. These standards only apply to new development, not the tenant improvement used in the example. The Walmart/Renton court case included along with these comments is not on point because the question was whether an addition to a building 55' from the street could be required to meet a minimum front yard setback, the conclusion was that it could not. Our corridor regulations only apply 185' back from the curb, 18.28.020 A 4 a.
	- Architectural Design Regulations		The new Design Manual provides greater clarity about the design goals for the Southcenter area. It is structured to provide general design criteria to be met along with several examples and alternatives for how that might be done. Projects within the Workplace District continue to use the existing design criteria.
	In the foregoing situation it is highly unlikely that the landlord is going to repair the roof. The cost will exceed the consideration the landlord received in its leases. The situation could lead to the tenants terminating the lease and moving out of the building and potentially the city. The EcoNW memorandum supports our contention that the TUC Plan creates a disincentive to invest in the City. Rather than comply with the City's mandates developers will simply choose not to build.		The idea is that when an owner reinvests in a building it should move toward the area's vision. The proposed changes would exempt non-visible reroofs from the design review value calculation. The EcoNW memo (on the 2009 draft not the current proposal) actually says "It is our understanding that the City derived the thresholds through a careful review and analysis of building permits from prior years and therefore represent levels of investment - both in absolute dollars and percent relative to total value - that are appropriate for Tukwila." p. 17

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pg 5, 18.28.020.C.1.b	Add new subsection (3) to 18.28.020.C.1.b to read as follows: " (3) Design review is only required for that portion of a structure triggering the design review threshold. " This language would clarify that when an exterior repair, reconstruction, alteration or improvement triggers design review, or when exterior expansion triggers design review, design review would be limited to that portion of the structure which is being affected. This clarification would ensure that the applicability for design review is consistent with applicability of the remainder of Chapt 18.28, as described in proposed section 18.28.030.C.2, which states that "expansions of existing buildings shall meet all requirements for the new portions of the structure." Westfield is concerned that the design manual may impose requirements that result in substantially increased development costs and may fail to recognize unique issues faced by Westfield & existing & prospective tenants.	Ex. 1; 6.25.12; Letter from Brent Carson (VanNess Feldman GordonDerr)	Staff recommendation: Do not make the proposed revision because it would conflict with 18.28.030.C.(Pad Development, Expansions or Complete Redevelopment),2 which states: <i>Expansions of existing buildings shall meet all requirements for the new portions of the structure, and any alterations to non-conforming landscape areas or parking lots shall be made in accordance with the standards in TMC Chapter 18.70. If design review is triggered limited modifications to the exterior of the existing portion of the structure may be required to aesthetically unify the structure.</i> The intent is to allow for situations like the IFly project where a tenant improvement that is very different in color/style/materials is made compatible by adding selected design elements onto the existing structure. Staff is suggesting a new example in the Design Manual under 1. Architectural Concept D 4 to address this. If the PC adopts the suggested addition to the Design Manual the bold sentence above may not be needed. PC Comment 8.23.12: Mann - in favor of loosening requirements for repairs.
p. 8, Table 1	Continue most of the current permitted uses in the TUC to give flexibility and not create new nonconforming uses. Add back permitted uses such as bars, lounges, night clubs, billiard halls, brew pubs, restaurants with drive-thru, internet data centers, bulk retail.	Ex. 6, 7, 9; PC mtg 6/28/12, Open House; Jamie Durkin. PH Written comment dated 8.23.12. J.Desimone PH testimony.	These uses are all permitted within at least one of the Southcenter districts. They are not permitted in the TOD district because these uses would not necessarily be an appropriate neighbor for residential uses because of noise and late hours of operation. It is not clear into which additional districts he would like them added into. A restaurant with an associated cocktail lounge is permitted throughout the urban center. Staff Recommendation: No change PC Comments 8.23.12: Add back uses that would attract people, especially brew pubs - McLeod, Mann, Hunter See Illustration D for the table change to allow uses into the TOD District.
p. 11 Table 2	Increase allowable building height in the TOD zone to 70 feet within the 100 foot distance of the high water mark on properties adjacent to the river in the TOD zone that do not flood and have no need for dykes. By allowing smaller parcels along the river within the TOD zone to develop mixed use residential up to 70 feet within 100 feet of high water mark will encourage residential development. These areas are not prone to flooding and pose not public risk environmental impacts.	Ex. 6, 7, 9; PC mtg 6/28/12, Open House; Jamie Durkin. PH Written comment dated 8.23.12. PH testimony.	This would require a change to the Shoreline Master Program which limits heights to 45' within the 200' Shoreline Zone. Nothing in the proposed draft of 18.28 prevents use of the height incentive in the shoreline overlay. Staff Recommendation: No change
p. 19	At 40-50' the street tree spacing for the Freeway Frontage corridor is much larger than the 20-30' called for in the other corridors. Spacing should be reduced or larger trees should be required.	Alford PC mtg 8/23/12	This spacing was chosen based on the higher speeds and lower pedestrian volumes along this stretch of street. Existing trees are spaced closer together than 40'. Staff Recommendation: Revise the street tree spacing for the Freeway Frontage corridor as follows: Each block shall be planted with deciduous trees at a maximum distance of 40-50', depending on species.
p. 22 18.28.030	With respect to 18.28.030(5), the reference to 18.70 doesn't make clear whether alterations to nonconforming structures trigger the requirements of chapter 18.28. TMC 18.70.050(1) addresses ordinary maintenance of nonconforming structures, but it doesn't provide guidance with respect to the applicability of chapter 18.28 when such repairs are made. Our concern is that an ordinary repair that costs more than 10% of the assessed value of the building will trigger the corridor standards. If your intent is that the repairs listed in TMC 18.70.050(1) DO NOT trigger the requirements 18.28, I suggest the following change:18.28.030.5. Alteration to nonconforming structures uses, landscape areas or parking lots shall be made in accordance with the standards in TMC Chapter 18.70 and the corridor standards set forth in this chapter 18.28 shall not apply to ordinary maintenance of a nonconforming structure allowed by TMC 18.78.050.	Balint 8/28/12 Email	The suggested change would create a lower design review threshold for non-conforming structures than for conforming structures. If their exterior repairs and maintenance trigger design review they should be subject to the same process as other similarly situated buildings. Staff Recommendation: No change
p. 22 18.28.030 C.2.	18.28.030.C.2. Mall asks for the following revised language: "Expansions of existing buildings shall meet all requirements for the new portions of the structure, and any alterations to non-conforming landscape areas or parking lots shall be made in accordance with the standards in TMC Chapter 18.70. If design review is triggered limited modifications to the exterior of the existing portion of the structure may be required to aesthetically unify the structure. The Mall's concern is that the term "limited modifications" provides no constraints on the type or extent of modifications that could be imposed by the City, which may end up being too expensive. The phrase "the existing portion of the structure" could be used to impose exterior alterations far from a small expansion, and used to impose exterior alterations far from the small area being expanded. They believe the Design Manual provisions accomplish the City's intent for this provision.	Ex. 10; 8/23/12; Letter from Brent Carson (VanNess Feldman GordonDerr)	Staff Recommendation: If the PC adds the suggested new example in the Design Manual under 1. Architectural Concept D 4 <u>Alternately an existing building may be modified using the design vocabulary carried over from the addition to create compatibility.</u> then strike the language as proposed.
p. 24 18.28.060	Requiring new streets every 800' does not seem like a coordinated or legal approach to achieving the City's desired grid system. The City should make comprehensive changes to its transportation improvement plan and make the necessary public investments in land and infrastructure.	Ex. 11; 8/23/12; Balint for Segale	This standard only applies when the transportation impacts of an intensification of use make the new street reasonably necessary 18.28.030 B. The parties benefitting from a use intensification should share the burden of mitigating the impacts on the surrounding area. For reference the Segale owned strip center has less than 700' of frontage each on Strander and Andover Park W. Staff Recommendation: No change
p. 28 18.28.120	This provision has dubious legal validity. New streets should not be required unless necessary for access or to meet established transportation levels of service.	Ex. 11; 8/23/12; Balint for Segale	We agree about when new streets should be required. The section only applies when the transportation impacts of an intensification of use make the new street reasonably necessary 18.28.030 B. Staff Recommendation: No change

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p. 29 18.28.130 A 8	Requiring an owner of an existing building to install decorative lighting will simply discourage the building owner from performing improvements because of the extra cost associated with this and other unnecessary design-related requirements. Lighting should be necessary for safety, not for aesthetics. Likewise street furnishings such as benches and trash receptacles are required "where appropriate." This language is vague and requiring benches and furnishings doesn't resolve a public harm, it confers a public benefit. Providing amenities such as benches should be at the discretion of the building owner or tenant.	Ex. 11; 8/23/12; Balint for Segale	This standard only applies when the transportation impacts of an intensification of use make the frontage improvements reasonably necessary 18.28.030 B. Even then there are exceptions under 18.28.130 B when the cost of the improvements are disproportionate to the cost of the triggering work. Staff Recommendation: No change
P. 30 18.28.140	This requirement should absolutely not apply to additions/renovations to existing buildings. Per the KCCPP growth within an urban center is supposed to be encouraged; requiring a building owner who wants to add 20,000 sf to and existing 100,000 sf building to RELOCATE the existing building so that it meets building orientation requirements will absolutely stifle growth. For an example of how a similar requirement has gone awry read the attached case involving Renton and Walmart.	Ex. 11; 8/23/12; Balint for Segale	The commenter seems to have misread the standard. A building is oriented to a street or open space if the building: <i>a. Has a primary public entrance which opens directly on to or facing that street or open space; and</i> <i>b. Incorporates architectural elements and details that are visually interesting, attractive and scaled to the pedestrian on the building façade facing the street or open space.</i> This standard does not contain a maximum setback that could be read to require relocation of a building as in the Renton case. In addition our corridor regulations only apply to development within 185' back from the curb, 18.28.020 A 4 a. Staff Recommendation: (See similar response below regarding transparency) Raise the threshold for compliance with building orientation for existing buildings. Use a reconstruction threshold similar to what is currently required for Nonconforming Structures (TMC 18.70.050). Add the following to 18.28.030.C. Applicability: <u>4. Compliance with building orientation and ground level transparency is required for existing buildings only if they are destroyed by any means to an extent of more than 50% of its replacement cost at the time of destruction, in the judgement of the City's Building Official.</u>
P. 30 18.28.140	What does it mean for a building to be located along a street as required by 18.28.140?	Strander 9/10/12 Email	During the code revisions the maximum setback standard was removed from this requirement so the phrase "located along" the street does not have a specific meaning and should be deleted. Staff Recommendation: Change 18.28.140 2. to read: Where Building Orientation to Streets/Open Space is required, all buildings shall be located along and oriented towards new or existing street(s) or public open spaces, excluding alleys.
p. 30 18.28.140	In our discussion today Nora clarified the intent of TMC 18.28.140 "Building Orientation to Street/Open Space" and said it doesn't require buildings to be located along the street (because there is no maximum setback). Changes were made to 18.28.140.1 that appear to relax the building orientation standard, but those changes haven't been applied throughout the entire section of the code. I suggest changing 18.28.140.2 as follows: Where Building Orientation to Streets/Open Space is required, all buildings shall be located along and or oriented towards new or existing street(s) or public open spaces, excluding alleys.	Balint 8/28/12 Email	During the code revisions the maximum setback standard was removed from this requirement so the phrase "located along" the street does not have a specific meaning and should be deleted. Staff Recommendation: Change 18.28.140 2. to read: Where Building Orientation to Streets/Open Space is required, all buildings shall be located along and oriented towards new or existing street(s) or public open spaces, excluding alleys.
p. 40 18.28.200	This requirement is very problematic when applied to existing buildings. Installation of new or larger windows required to reach minimum transparency % may not be structurally feasible. The cost for such work includes both shop-front construction and expense of redesign of the shop floor layout. To apply this rule universally to an entire existing building is cost prohibitive. While it can be dealt with individually (on a tenant by tenant basis) it may result in an unpleasing mix of old and new storefronts side by side.	Ex. 11; 8/23/12; Balint for Segale	This standard only applies to building façades that face "a street, public sidewalk, open space, or river" when design review is triggered. Non-commercial uses (industrial, warehouse) require much lower levels of transparency. Staff Recommendation: (See similar comment above regarding building orientation). Raise the threshold for compliance with transparency requirements for existing buildings. Use a reconstruction threshold similar to what is currently required for Nonconforming Structures (TMC 18.70.050). Add the following to 18.28.030.C. Applicability: <u>4. Compliance with building orientation and ground level transparency is required for existing buildings only if they are destroyed by any means to an extent of more than 50% of its replacement cost at the time of destruction, in the judgement of the City's Building Official.</u>
p. 41 18.28.220	It is hard to fathom the legal basis for this requirement as it arbitrarily imposes a significant burden on certain property owners simply for the purpose of conferring a public aesthetic amenity. If the City wants to emphasize certain corners, it should create an incentive for property owners to follow the corner feature guidelines, not a requirement adherence.	Ex. 11; 8/23/12; Balint for Segale	This is an example of a requirement in the prior draft of the Plan being converted to a design guideline. Addressing site-specific characteristics such as being located on a high-traffic corner is an element in high quality urban design. We would welcome any suggestions for incentives beyond the setback and height exceptions and special sign allowance at 19.20.050 D.
p. 42 18.28.230	Section A 2b requires pathways to connect the public sidewalk to the front door and to any parking areas. Retrofitting an existing parking lot would result in a reduction of parking stalls that would take the property into a non-conforming state and limit the property owner in marketing and leasing efforts as certain retail uses would no longer qualify for tenancy due to overall parking counts.	Ex. 11; 8/23/12; Balint for Segale	Providing safe paths for employees and customers to travel between the sidewalk and front door is part of high quality urban design as well as an ADA requirement. This is unlikely to create a non-conforming parking ratio because many sites already provide this and the lower parking ratios in the draft Plan mean that many sites will have excess parking after adoption. Staff Recommendation: No change

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p. 44 18.28.240	It is surprising to see the City extend its retroactive reach beyond public frontage to "other areas on-premises". The language being proposed is dictating pruning regulations within a property, not just along street frontages. Depending on how the existing landscaping will tolerate the new pruning regulations, the TUC Plan could require a property owner to replace all landscaping. Additionally the TUC Plan states that existing trees may not be topped for any reason. More often than not, topping is requested/required by the retail tenant to ensure signage visibility. In retail leasing it is all about traffic counts, visibility and parking. We have tenant commitments to ensure a signage sightline from the intersection of Strander and Andover Park W. As a result we do monitor the height of trees in the parking lot area and prune where necessary. The proposed TUC Plan assumes buildings are constructed immediately adjacent to the road where signage visibility would not be impacted by any trees. Most of the existing strip centers are set back where internal parking lot trees, could, and do, impact signage. We agree with the City's goal that care should be taken to preserve the integrity and visual appearance of existing trees, however retail tenants rely on signage and frontage and oftentimes this will drive site selection.	Ex. 11; 8/23/12; Balint for Segale	The intent is that if landscaping is planted anywhere on site it should survive, not create unsafe conditions (blind corners, harbor criminal activity, falling limbs), and provide screening where needed. Conflict between signage and trees, leading to the temptation to top them, was one of the reasons the new sign code only allows monument signs. Topping is counter-productive according to the Washington State Department of Natural Resources, resulting in dense growth of weakly attached suckers, vulnerability to insect infestation and fungal decay, which requires ongoing removal of hazardous limbs, see illustration B . This is why the current code already prohibits tree topping, 18.52.050 B. Staff Recommendation: No Change
p. 44	Who is responsible for maintaining landscaping on public thoroughfares? Can the City charge owners if they don't maintain their landscaping?	Mann PC mtg 8/23/12	18.28.240 B 9 Landscaping is required to be maintained by the property owner for the life of the project. Failure to maintain landscaping is addressed as a code enforcement issue. Staff Recommendation: No Change
p. 49 18.28.250	It is unclear as to what level of compliance is being expected for pedestrian passage and circulation in existing developed properties. It is likely that the required open space minimum area and provisions needed for walkways is not attainable to maintain compliance with required landscaping areas, parking stall counts, etc.	Ex. 11; 8/23/12; Balint for Segale	See 18.28.250 D 2. <i>Compliance with the open space square footage ratio listed in Table 3 is required for new construction, the area of expansion of existing buildings and changes in use from one category in Table 3 to another.</i> For existing buildings this requirement applies to new square footage and intensifications of use. Staff Recommendation: No Change
50	18.28.250. Table 3. Concern about the developer costs associated with open space requirement for residential uses. Are added costs too much to make a project pencil?	Hundtofte PC mtg 5.24.12	Staff pointed out that there is less private open space required per unit than in the current code. Staff Recommendation: No Change
55	18.28.250.G. Concern over the visual impacts associated with requiring balconies for all MF units in residential developments in SC. Too cluttered? Not a positive addition to Tukwila's image?	Hundtofte PC mtg 5.24.12	Staff Recommendation: No Change
p. 56 18.28.260	This entire section needs further consideration and review for existing properties. Similar to all of the previous comments the addition of landscape islands and pedestrian circulation routes will trigger parking ratio non-compliance in existing properties. For existing properties the City's continued efforts to reduce current parking counts will very likely result in a Landlord being found in default of parking commitments made in existing lease agreements. The requirement places undue economic hardship on Landlords of previously developed properties and will reduce the tenant pool available to property owners to fill its vacancies.	Ex. 11; 8/23/12; Balint for Segale	The commenter seems to have misread the standard and is unfamiliar with existing City requirements. Parking lot landscaping is already required throughout the City, see existing 18.52.035. The reduced parking standards in the revised Plan are minimums, not maximums, so less parking is required not more and therefore could not create an economic hardship. Staff Recommendation: No Change
p. 58 Table 4	How do the recommended parking standards differ from those in the current code?	Alford PC mtg 8/23/12	General retail is .7 spaces/1000 ufa lower than existing, restaurants are 4/1000 lower, new category added for planned shopping centers over 1 million SF to recognize the Mall's current parking variance and the reductions in parking demand due to the conditions of that variance, residential requirements set at the level used in the urban renewal area to recognize the urban nature of any new housing constructed in the Plan area. Staff Recommendation: No Change
p. 59	TMC 18.28.260.B.5.b. Increase the distance a property may be from transit center in order to be eligible for a parking reduction from 600 to 1320 feet. This will allow for reduced parking requirements for residential development and encourage new housing to locate in close proximity to transit center. Studies have shown that this is the distance people will walk to commuter rail station.	Ex. 6, 7, 9; PC mtg 6/28/12, Open House; Jamie Durkin	It is almost 1/4 mile from the station to West Valley Highway so an increase would allow businesses along Longacres to apply for the reduction. The full 1/4 mile around the bus transit center would capture a large number of businesses. See illustration A for extent of 600 and 1320 foot distances from the station and transit center. Staff Recommendation: Change distance to 1320' for residential units, retain 600 for commercial uses.
p. 59	Within 1/4 mile of Sounder Station, want only 1 space required per dwelling unit.	J.Desimone	See illustration A for extent of 1320 foot distances from the station and transit center. Proposed code has already lowered parking standards to 1 per studio or 1 bedroom, 1.5 for 2 bedrooms, 2 for 3 bedrooms. Staff Recommendation: Change distance for parking exception to 1320' for residential units.
Parking Structure Incentives	What incentives can we offer for creation of structured parking? It frees up space for development, reduces polluted run-off and is visually more appealing.	Mann, Alford PC mtg 8/23/12	The ECONW technical report indicated that the type of developer incentives needed for parking structures will most likely take the form of creative financing, public/private partnerships, and/or predevelopment agreements rather than through regulatory measures. Each project will have different needs, so ECONW recommends preparing a "public sector redevelopment tool kit" that could be used to offer developers assistance in order to achieve the community's goals for the urban center. We would welcome other suggestions.

Southcenter Design Manual Issues Matrix

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Design Criteria	Comment (language changes in strikout/underline, recommendation in bold)	Exhibit #/ Date/Source	Staff comment/analysis/options
1 D	Add an example to clarify that an existing building may be modified to match a new addition, such as with the I Fly expansion where the red color used on the expansion was carried over onto the awnings and roof of the other buildings on site.	Staff edit	Staff Recommendation: Add a fourth design example under this criterion to read 4. Alternately an existing building may be modified using the design vocabulary carried over from the addition to create compatibility.
8 A.	The term "four-sided" implies that buildings can't have more complex forms.	McLeod 6/28/12 PC WS	Staff Recommendation: Change to read "Buildings shall be "four-sided", meaning that all facades including side and rear facades should be considered visible (unless facing "blind" onto an adjacent party wall) and should be treated with an architectural façade composition similar to that on the building's front.
10 D	The Southcenter mall maintains multiple main entrances. Should a redevelopment occur that triggers design review Westfield does not want to be limited to building a "visually secondary" entrance.	Letter from Brent Carson (VanNess Feldman GordonDerr), 6.25.12	Staff Recommendation: Add a third design example under this criterion to read, "3. Large multi-tenant buildings may have multiple main entrances."
Pg 30, 10 E & E.1	Westfield is concerned with how the Loading & Service entrance provision will be interpreted for the Mall, which faces 4 separate streets. Determining the "least visible location" may not meet the needs of the retailer(s) involved and may simply not be feasible. Westfield would suggest that the term "shall" be replaced with "should". The City should consider allowing reasonable screening to achieve this objective.	Letter from Brent Carson (VanNess Feldman GordonDerr), 6.25.12	Staff Recommendation: Change to read "All service entrances and associated loading docks and storage areas shall be located to the side or rear of the building unless all facades face a public street in which case locate them in the least visible location or screen them with landscaping shall be used."
11 A 2	Including the word translucent implies that internally lit glass canopies are not permitted which is not the intent.	McLeod 6/28/12 PC WS	Staff Recommendation: Change to read "Vinyl or plastic awnings, and translucent awnings with interior lighting are not permitted."

General Topics & Minor Staff Edits Matrix

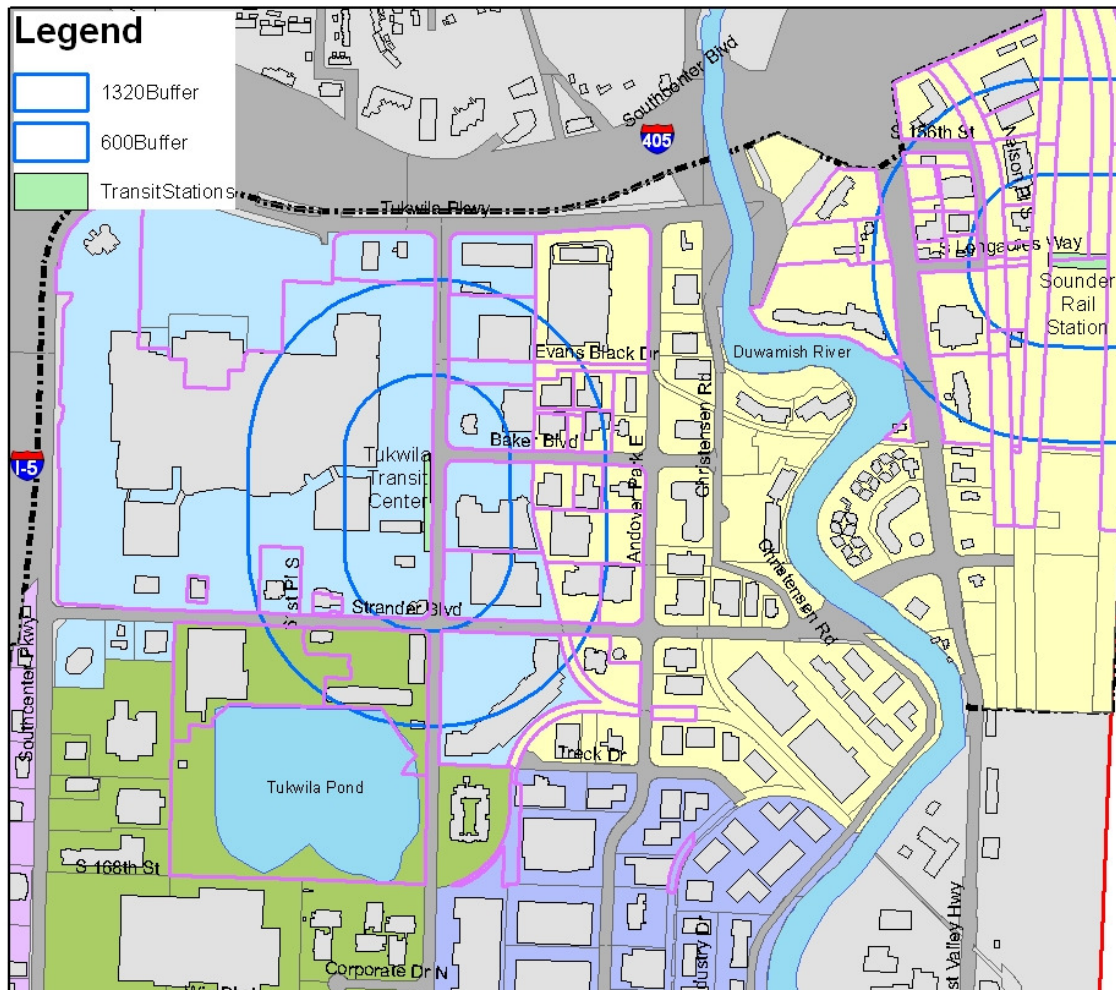
- Note that comments listed without an exhibit reference were delivered verbally during the public hearing.

Topic	Comment (language changes in strikout/underline, recommendation in bold)	Exhibit #/ Date/Source	Staff comment/analysis/options
General Comment	Concerned about potential flooding in the "workplace" areas, particularly at Andover Park E & S.180th street. The insurance companies will not provide flood insurance at this time. Existing and prospective tenants will not locate there. Would like the city to focus on that.	Ex. 5; 7/17/12; Harris Klein	This is a long term issue that the City is working on with the King County Flood Control District. It is not addressed within the Southcenter Plan.
Economic Development	Tukwila should be pro-active about getting new businesses. I would like to see a conference center. Other cities are promoting themselves, we should too.	Mann PC mtg 8/23/12	Tukwila funds an Economic Development Administrator position and uses lodging taxes to fund the Seattle Southside Visitors Bureau. The City explored creating a publicly owned conference center in the early 2000s and determined it was not financially feasible.
General Comment	The final documents are generally workable for Westfield.	B.Carson. PC Public hearing 8/23/12; written & oral comment	Comment noted
General Comment	Need to be careful with plan and development requirements. Current economy is hurting Southcenter businesses. Need to be careful about how city funds are spent - infrastructure is important.	B.Schofield. PC public hearing 8/23/12	Comment noted
Council Direction	On 3/14/2011 the Council discussed 3 alternatives for the Southcenter Plan and chose to reduce the scope of the project. The revised TUC Plan is not consistent with the direction given by Council. They specifically discussed converting design standards into into guidelines but the Plan still has requirements and requires design review. A major re-write of the Plan is necessary.	Ex. 11; 8/23/12; Balint for Segale	The Council was presented with outreach options that included a consultant led process, an advisory group, and a standard legislative process with a reduced scope. They chose the last and gave direction to streamline the Plan requirements and process. Staff briefed the CAP Committee on 9/21/11 on how we intended to move forward. We combined 7 use districts and 3 scale districts into 5 new districts; simplified the use categories; eliminated the thresholds for conformance with the Plan in favor of existing triggers; eliminated the 2 story minimum, tower bulk limit, building length limit, and build to corner requirements; narrowed the frontage coverage requirement to apply to only 1 street type; moved the building form standards into the Design Manual; provided more flexibility for the provision of open space; lowered some parking requirements; and created incentives for construction of frontage improvements and multi-family housing.
Countywide Planning Policies	There is no direct link between the TUC Plan and Urban Center status. Once designated as an urban center it is expected that a city will make planning decisions that allow an intense urban level of growth and development. The Plan appears to miss the critical zoning for growth component and is weighed too heavily toward directing what growth will look like, rather than on making policy decisions that will allow for that growth to take place.	Ex. 11; 8/23/12; Balint for Segale	See the Comp Plan revisions p. 3 Figure 22 for a comparison of the Countywide Planning Policies with the characteristics of Southcenter. The zoning standards (height, setbacks, uses) and transit infrastructure allow for the density of development required for urban centers. The CWPP also call for each urban center to be a "unique, vibrant community that is an attractive place to live and work" with a "pedestrian emphasis" (FW-14) and "superior urban design" (LU-45). The Plan started out as a prescriptive form-based code but has evolved to provide much more flexibility and alternatives for achieving the vision.
EcoNW Memo	The 2003 economic study found that the City was too regulatory and the same conclusion was reached in the 2009 EcoNW study. We need to make sure that the Plan is economically feasible.	McLeod PC mtg 8/23/12	The 2002 market study and subsequent supplement were a supply and demand analysis and forecast of market conditions for the retail, office, lodging, light industrial/warehousing and multi-family sectors. They did not discuss the Southcenter Plan regulations because they had not yet been developed. There was a 2003 pro forma analysis of redevelopment of the Target/Regency site which concluded that redevelopment to a higher intensity could be feasible with public improvements to the Pond. The 4 prototypes in the 2009 study were all multi-story. The 2 story prototype was feasible, the 6 and 11 story ones were not. This is consistent with the existing development pattern. The 2009 version of the code required 2 story development in some districts, that requirement has been removed in the current draft. So the Plan anticipates future market conditions where multi-story development is feasible but does not require it now.
EcoNW Memo	Is the ECONorthwest document on the City's website? Will ECONorthwest prepare an analysis on this version of the Southcenter Subarea Plan?	Strander 9/10/12 Email	The EcoNW memo has been available on the City's web site since it was presented to the PC on 12/10/09, see illustration C . Staff revised the current draft of the Plan to address the changes to the development code recommended in Section 4.1 of the 2009 memo.
EcoNW Memo	The City hired EcoNW to evaluate the City's vision and the development regulations in the 2009 draft of the Plan. This memorandum is attached as it is no longer available on the City's website. EcoNW concluded that the Plan and development code require a type of development that is not financially viable at this time because of uncertainty in the financial market, and is more likely to be viable even upon the market's return with significant public investment in amenity and infrastructure. Some other key points include: - Stakeholder concerns that the building types were too expensive for Tukwila's market were realistic and TUC regulations are likely to discourage improvements to existing structures	Ex. 11; 8/23/12; Balint for Segale	The EcoNW memo has been available on the City's web site since it was presented to the PC on 12/10/09, see illustration C . Staff listened carefully to the feedback from the 3 focus groups and Eco's evaluation and made extensive changes to the Plan.
			The 6 and 11 story prototypes were not financially feasible, though the 2 story one was. Staff revised the Plan to address the changes to the development code recommended in Section 4.1: Organization and complexity - the number of districts were reduced, and the form-based code sections were moved to the Design Manual or deleted Thresholds - these were deleted in favor of existing standards Parking - some parking standards were lowered but until the transit investments alter the mode split and on-street parking is added on-site parking is still needed. Because there are no pay parking lots, city provided lots or on-street parking available overflow is likely to result in hide-and-ride on adjacent property or customers going to other businesses. Minimum heights - 2 story standard was dropped, 25' minimum height only required along Baker Tower bulk and minimum frontage requirements - tower bulk standards were deleted and frontage coverage requirements were limited to the Walkable and Esplanade corridors Open space - EcoNW concluded that "the amount and type of pedestrian space is consistent with other cities in the northwest." Staff added additional flexibility to the standards. Fire code - Tukwila has adopted a 5 over 1 ordinance as recommended
	- Higher end development will have to compete with well-established areas in Seattle and KC		Retaining Tukwila's regional competitiveness is a key motive for developing the Plan.
	- If the City does require developers to fund all the off-site infrastructure it may discourage development. Explore how the City can share some of the burden.		The City has invested in the Klickitat project, the new bus transit center, and Tukwila Pond Park master plan and water quality improvements. Given the current debate about the pedestrian bridge there may be limited funds available for additional infrastructure investments in the urban center in the near future.
	- Using the TUC regulations EcoNW created 4 prototypes and concluded that the first 3 were more expensive to build than it would be worth and could not get financing.		It is true that it may be some time before land values in the Southcenter area support 6 and 11 story buildings. The Plan does not require this type of development, but it does provide standards and guidance for when the market arrives. There was a design review application this year for a 4 story hotel in the urban center.

Topic	Comment (language changes in strikout/underline, recommendation in bold)	Exhibit #/ Date/Source	Staff comment/analysis/options
SEPA	The current proposal does not include documentation consistent with the requirements of SEPA. Has the City performed environmental review for the current or past drafts of the TUC Plan?	Ex. 11; 8/23/12; Balint for Segale; Strander 9/10/12 Email	The decision to designate Southcenter as an urban center and the environmental implications of that were analysed as part of the 1995 EIS. SEPA review will be conducted on the PC recommended subarea plan prior to Council review.
SEPA	Has an Environmental Impact Statement been done for this project? If so, when? If an EIS has been done, does the scope of it include everything on the Southcenter Subarea Plan?	Strander 9/10/12 Email	An EIS was completed for the rewrite of the Comprehensive Plan and Zoning Code in 1995. This included both the vision for the urban center and the specific zoning regulations that allowed a wide range of uses and up to 115' tall buildings. The current draft of the plan creates districts which are differentiated by use and over the majority of the urban center will have lower building heights so environmental impacts will be lower than previously analyzed. Additional environmental review specific to the proposed plan and regulations will be conducted on the PC recommended Southcenter Plan documents prior to Council review.
SEPA	When would SEPA review be done for the "road diet" restriping of Baker and APE to accommodate street parking and bicycle lanes?	Strander 8/23/12 Hearing; Strander 9/10/12 Email	Restriping an existing urban road would be exempt from SEPA analysis under WAC 197-11-800 2 (c) <i>The construction or installation of minor road and street improvements such as pavement marking ... and reconstruction of existing roadbed (existing curb-to-curb in urban locations), including adding or widening of shoulders, addition of bicycle lanes, paths and facilities, and pedestrian walks and paths, but not including additional automobile lanes.</i> However PW has indicated that a Traffic Impact Analysis would be required to determine whether or not the "road diet" would create (or exacerbate) roadway congestion or level of service problems elsewhere in the roadway system prior to making changes.
Concurrency	Has City considered how the new street regulations will affect levels of service and concurrency? Adding new streets every 800 feet will likely impact the existing transportation system.	Ex. 11; 8/23/12; Balint for Segale	As part of Tukwila's ongoing transportation concurrency analysis, growth in the Southcenter area as well as the impacts of potential new streets have been entered into our traffic model. New streets will add capacity and relieve pressure on existing arterials. New streets will also make parts of the urban center more walkable.
Due Process	Zoning regulations cannot require an individual to shoulder an economic burden, which in justice and fairness the public should rightfully bear. Many of the regulations in the TUC Plan appear to confer a public benefit, rather than legitimately addressing a public harm. The City should let the market dictate what public benefits and amenities property and business owners will provide.	Ex. 11; 8/23/12; Balint for Segale	It is difficult to provide a specific response when it is not clear which regulations the commenter considers unfair.
Subarea Plan Contents	The sub-area plan is too limited and does not contain common elements such as an analysis of market/economic impacts, housing, environmental factors, utilities and transportation. Of the recommended elements utilities and transportation are most important.	Ex. 11; 8/23/12; Balint for Segale	The decision to designate Southcenter as an urban center and the environmental implications of that were analysed as part of the 1995 EIS. In the 10 years that we have been working on the Southcenter Plan we have adopted updates to Tukwila's Water, Surface Water and Sewer Plans which factor in Tukwila's growth targets and proposed densities. As part of Tukwila's ongoing transportation concurrency analysis, growth in the Southcenter area as well as the impacts of potential new streets have been entered into the City's traffic model. Because analysis of the utility and transportation impacts of growth in the urban center have been incorporated into other documents they are not repeated in the subarea plan.
Subarea Plan, p. 5	Update photo of mall - associated with the bullet Large regional shopping Mall surrounded by	Staff 8.20.12	Staff Recommendation: update with new photo provided by Westfield.
Subarea Plan, Future Street on S. Side of Pond	Notes that Puget Sound Energy (PSE) operates a 115kV underground transmission line that runs along the south edge of Tukwila Pond. It's in an easement and it appears to look like a sidewalk corridor if you look at it in the field. The map on page 7 labels the south area of the pond as a "Future Urban Corridor." Does that mean trails or roads? The line has been in place since the mid 1970's and we're currently in the beginning stages of replacing the line with new conductor.	Cody Olson (PSE) 8.15.12, email	Comment noted. The Plan assumes that, when constructed, the new thoroughfare cross-section will use PSE's "sidewalk" as the sidewalk for the north side of the street.
Subarea Plan, p. 44	What will be the determination as to where the parking structure will be located?	Strander 9/10/12 Email	The idea was that it would be located in the TOD area to provide convenient overflow parking for businesses in that area, and allow customers to "park once" and walk between multiple stores without having to move their cars. More specific siting would be addressed in the feasibility study.
Draft TMC 18.28, p. 2	18.28.020 How to use the development code. Staff recommends edits that clarify how the District and Corridor standards are referenced. Edits do not change the meaning or intent of the regulations.	Staff edits	Staff Recommendation: Revise 18.28.020.B.1 as follows: "Locate the property on the District Map, Figure 1, and Corridor <u>Type</u> Map, Figure 2." Revise 18.28.020.B.2 as follows: "Review the District Standards (<u>Tables 1 & 2</u>) and Corridor Standards (<u>Figures 3-10</u>) in the accompanying <u>Tables</u> and identify the specific standards for the applicable District and Corridor Type. Note that the <u>Tables and Figures</u> are intended as a summary..."
Draft TMC 18.28, p. 7 Corridor map	Staff recommends edits that maintain reference/naming consistency.	Staff edits	Staff recommendation: Revise as follows: "Figure 2 Corridor <u>Type</u> Map"
Draft TMC 18.28, p. 13	Walkable Corridor. Missing text. Does not change intent or requirement	Staff edits	Staff recommendation: Add <u>Special Corner Feature</u> under the Architectural Design Regulations
Draft TMC 18.28, p. 16	Neighborhood Corridor. Missing text. Does not change intent or requirement	Staff edits	Staff recommendation: Add <u>Special Corner Feature</u> under the Architectural Design Regulations
Draft TMC 18.28, p. 17	Urban Corridor. Missing text. Does not change intent or requirement	Staff edits	Staff recommendation: Add <u>Special Corner Feature</u> under the Architectural Design Regulations
Draft TMC 18.28, p. 118	Commercial Corridor. Missing text. Does not change intent or requirement	Staff edits	Staff recommendation: Add <u>Special Corner Feature</u> under the Architectural Design Regulations
Draft TMC 18.28, p. 41 18.28.220	As per 18.28.220, are special corner features required or just allowed?	Strander 9/10/12 Email	A new building at a designated "special corner feature" location would be required to meet the additional design criteria at section 6 of the Southcenter Design Manual.
Draft TMC 18.28, p. 51	Who determines what kind of open space is provided pursuant to the open space regulation requirements in section 18.28.250? How will this determination be reflected in the code?	Strander 9/10/12 Email	Applicants have a choice of options for meeting their open space requirements, see 18.28.250 E 1 "Pedestrian space for commercial uses are publicly accessible, outdoor, landscaped spaces used primarily for active or passive community recreation and civic purposes. These may include a linear green, square, plaza, courtyard, or pedestrian passage."
Draft TMC 18.28, p. 53	In Draft Chapter 18.28.250 E 3 f it states: "For properties adjacent to the Green River, a passage may include a pedestrian connection between the Green River Trail and a publicly accessible street/sidewalk. The passage should be established in an easement allowing for public access through private property." Does this mandate access through private property?	Strander 9/10/12 Email	No, it is one option for providing open space.
Southcenter Design Manual, 10 D	Missing word.	Staff edit	Staff Recommendation: Change to read "D. Secondary Entrances: Side or rear building entries shall be consistent with but visually secondary to main entrances."
SC Comprehensive Plan, Figure 24	Image shown for envisioned high density development has 9 stories, can this be achieved in the Plan area?	Mann PC mtg 8/23/12	It could be built with a height incentive in the Regional Center District.

Comment Matrix Illustrations

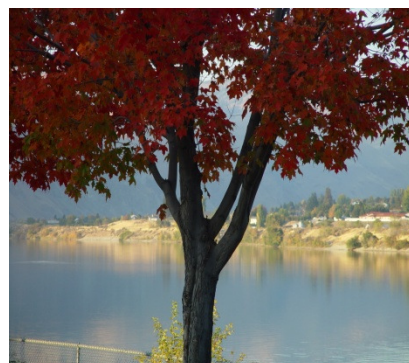
A) Walking Radius for parking reduction eligibility



B) Information about the negative effects of tree topping

Department of Natural Resources information:

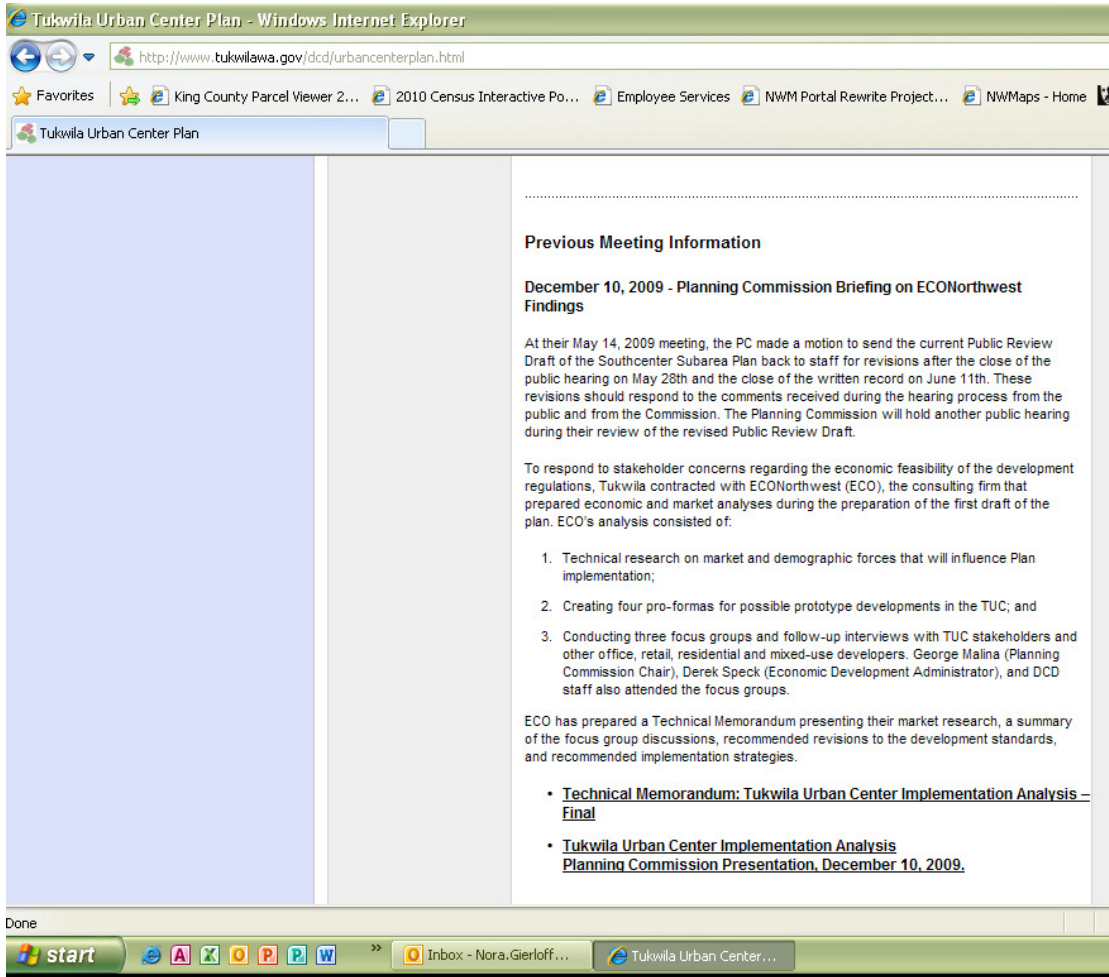
http://www.dnr.wa.gov/ResearchScience/Topics/UrbanForestry/Pages/rp_urban_dont_top_trees.aspx



The 'broom look' of this willow was caused by severely topping the tree-wrecking its future growth.
 Photo: Linden Mead/DNR

Tree limbed up to preserve views.

C) Screen shot of City of Tukwila web site showing where to download the EconW Technical Memorandum.



D) Additional Uses in the TOD District

Land Uses Allowed by District	Regional Center	TOD	Pond District	Commercial Corr.	Workplace
P = Permitted A = Accessory C = Conditional UUP = Unclassified Use Permit					
Retail¹					
Bars, Cocktail Lounges, Nightclubs & Pool Halls	P	<u>P</u>	P	P	
Brew Pubs, on-site brewing	P	<u>P</u>	P	P	

E) Regional Center Description Revisions – Subarea Plan

The Regional Center

The Regional Center portion of this Plan is the primary shopping and entertainment destination for South King County, and the centerpiece of the Southcenter area. It occupies the highly visible and accessible northwestern quadrant of Southcenter, which is nestled snugly up against the intersection of Interstate 405 and Interstate 5. The Regional Center owes its success to and is anchored by the recently expanded and refurbished Westfield Southcenter Mall. The drawing power of this retail powerhouse will continue to bring investment in retail and services oriented to an expanding regional trade. Just to the east, Acme Bowl, LA Fitness and I-Fly will serve as complements to the Mall and strong attractors for new entertainment venues in the area. The new Transit Center with service to the Sounder commuter rail and LINK light rail stations, local and regional bus routes, and bus rapid transit (BRT) is prominently located between the Mall and existing entertainment venues.

As new investment continues to flow into the Plan Area, the community envisions the emergence of an increasingly urban district that uses its progressively more valuable land with greater efficiency, which can be comfortably explored not only by automobile but also on foot or bicycle. The ~~area surrounding the Mall~~ District ~~may will likely~~ begin changing from the exclusively parking-lot-surrounded, auto-dominated development to an increasingly walkable and amenity driven pattern reflecting contemporary consumer and investor preferences. However, ensuring excellent access for all modes of transportation into the Regional Center will be key to its continued success.

Over time, public investments, ~~when~~ combined with market-driven infill, ~~are intended to may~~ instigate new development increasingly characterized by a pattern of walkable-scaled city blocks with key street frontages lined with visible storefronts and active sidewalks (Photos 1, 2). Buildings may be oriented to public spaces and sidewalk areas with higher levels of amenity (Photo 3). Abundant and convenient parking will be provided, but will no longer dominate the view from the road or the sidewalk.

As the Regional Center continues to grow in response to the growth of the region, the market, public investment, and escalating property values, the ~~D~~ district may continue to intensify with upper stories containing offices (Photo 4), homes (Photos 5) or hotel rooms. Over the long term, infill development on the high-value property of the Mall ~~may will likely~~ continue the transition from surface parking to structured parking, and may be increasingly characterized by mid-rise or high-rise building components built over the retail base. This process of increasing land use efficiency, development intensity, synergy and mix, will be combined with public and private investments increasing walkability and accessibility befitting a true regional center. The

increased intensity and vitality can continue the process of broadening the Mall's draw, expanding its "captive audience," adding customers, residents, employees and safety to the dynamic center of the region.

| In the long term, the Mall, the entertainment area, and the Southcenter Transit Center will continue to be the armature for the ongoing escalation of value, activity and investment. The access points and internal streets of the regional shopping mall will likely be extended, developing into bustling, high amenity spines that connect shopping anchors and shopfronts southward to the north shore of Tukwila Pond (ultimately an "amenity anchor", Photo 6) and eastward toward additional shops in the direction of Southcenter Transit Center (Photo 7).