

TMC 18.28 TUC District Zoning Regulations - Revised Issues Matrix

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

Page # in Plan	Zoning Code Comment (language changes in strikethrough/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 of a building's façade</u> 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 <u>cost of that work exceeds</u> 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 exceeds</u> 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: " <u>(3) Design review is only required for that portion of a structure triggering the design review threshold.</u> " 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 <u>40-50'</u> , 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 an 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 <u>or</u> 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.