

June 11, 2009

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COMMUNITY
DEVELOPMENT

VIA Email

Lyn Miranda
Senior Planner
City of Tukwila
6300 Southcenter Blvd
Tukwila, WA 98188

**RE: Urban Center Plan Comments
 Southcenter Shopping Center
 Tukwila, WA**

Dear Ms. Miranda:

Per our recent meeting with the City of Tukwila and our attendance at the City outreach meetings, we have the following comments on the Plan:

1. There are triggers that would involve bringing a building into compliance. If owner spends more than 50% of replacement value of building they would be required to bring into compliance under the proposed plan.

-Will the City calculate the value of all of the buildings on the subject property (total GLA) or by physical building? If the trigger is based on total shopping center GLA we have little exposure to this trigger. Either way, the proposed plan does not address this issue.

2. Will an Act of God trigger the requirement to rebuild a compliant building?

3. We believe the proposed plan reduces the amount of time an owner has to bring a nonconforming use into compliance before the City will effect the use permit. Is this the case?

4. The City is using 2002/2003 economic study. We recommend that they conduct a new study to get a clear picture of what is feasible in this economy.

5. Is the \$100,000 improvement threshold before or after taxes?

Sincerely,

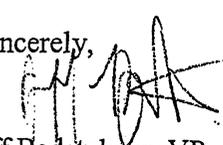

Jeff Badstubner, VP
Regency Centers

EXHIBIT 20 DATE 6/11/09
PROJECT NAME TUC Plan
FILE NO 409-008

