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:	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.
	- 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		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.

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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) 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.* 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 regulationsin 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 Type Map, Figure 2." Revise 18.28.020.B.2 as follows: "Review the District Standards (Tables 1 & 2) and Corridor Standards (Figures 3-10) ~~in the accompanying Tables~~ and identify the specific standards for the applicable District and Corridor Type. Note that the Tables and Figures 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 Type Map"
Draft TMC 18.28, p. 13	Walkable Corridor. Missing text. Does not change intent or requirement	Staff edits	Staff recommendation: **Add** Special Corner Feature 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** Special Corner Feature 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** Special Corner Feature 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** Special Corner Feature 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 publically 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 Comprehen-sive 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.