# ULI Washington

# A Technical Assistance Panel Report

## Improving Mature Commercial Centers: Creating a Sense of Place in Montgomery County

**Sponsored by:**
**The Maryland - National Capital Park and Planning Commission**

**July 12-13, 2005**

# Montgomery County, Maryland

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## About ULI Washington—a District Council of the Urban Land Institute

ULI Washington is a district council of ULI–the Urban Land Institute, a nonprofit research and education organization supported by its members. Founded in 1936, the institute now has more than 25,000 members worldwide representing the entire spectrum of land use and real estate development disciplines, working in private enterprise and public service.

As the preeminent, multidisciplinary real estate forum, ULI facilitates the open exchange of ideas, information and experience among local, national and international industry leaders and policy makers dedicated to creating better places.

The mission of the Urban Land Institute is to provide responsible leadership in the use of land to enhance the total environment.

Members say that ULI is a trusted idea place where leaders come to grow professionally and personally through sharing, mentoring, and problem solving. With pride, ULI members commit to the best in land use policy and practice.

In the ULI fashion of offering an unbiased and non-partisan exchange on issues impacting the industry, ULI Washington provides the avenues for active dialogues between private industry, environmental organizations, and public agencies to help provide solutions to local and regional land use issues.

## About The Technical Assistance Panel Program (TAP)

The objective of ULI Washington's TAP program is to provide expert, multidisciplinary advice on land use and real estate issues facing public agencies and non-profit organizations in the Washington metropolitan area. Drawing from its extensive membership base, ULI Washington conducts one and one-half day panels offering objective and responsible advice to local decision-makers on a wide variety of land use and real estate issues ranging from site-specific projects to public policy questions. The TAP program is intentionally flexible to provide a customized approach to specific land use and real estate issues.

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# Contents

# Acknowledgements

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Special thanks are extended to Kathy Reilly as project planner, for the time she took to coordinate the project and make sure that the panel went smoothly. The panel also appreciates the work of Calvin Nelson, Jason Sartori, Illana Branda, and Sam Dixon, for putting together the panel's extensive briefing materials and graphics, as well as former staff member Maria Martin who compiled the initial data. The panel would also like to extend its thanks to Karl Moritz, Division Chief, Research and Technology and his staff, Pamela Zorich, Matthew Greene, Sharon Suarez, Gary Goodwin, Krishna Akundi, and Wayne Koempel; Lisa Rother of the County Executive's Office, and Tedi Osias of the Housing Opportunities Commission, for their participation in the panel process.

ULI Washington hopes that the comments and recommendations provided in this report result in a valuable contribution to the redevelopment of Montgomery County's mature commercial centers. We encourage the M-NCPPC to inform us of new developments associated with this project and allow us to participate in future panels should the need arise.

# The Panel

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# Foreword: Overview and Panel Assignment

Over the last 25 years, Montgomery County has evolved from a suburban, bedroom community into a thriving multi-dimensional County. With a median household income of $85,400 and a strong office market, Montgomery County is the economic engine of Maryland.[1]

Over the next 25 years Montgomery County is projected to add 170,000 new jobs and 80,000 units of hew housing. While the County currently experiences a balance of housing and jobs, there will be many more opportunities for commercial development than for new housing, threatening the balance. Since the 1970s, 57% of those who live in Montgomery County work in the County. The M-NCPPC is proud of this statistic and would like to preserve this percentage.

This balance has unfortunately become increasingly more difficult to maintain. Single family homes are becoming out of reach for middle income families due to home prices increasing at a much faster rate than wages. The median sales price for existing homes is $400,000 and new homes average $750,000. Given the rise in housing costs and the finite availability of land, the M-NCPPC foresees the future of residential development to be focused on condominiums and apartments, anticipating that 60% of new residential left to be built will be multi-family housing. The M-NCPPC sees this form of housing as a great opportunity for affordable and workforce housing, an issue that has become increasingly important to the County and its residents.

Given the maturity of Montgomery County, the commitment to preserve its Agricultural Reserve, and the increased pressure on development, the M-NCPPC has redirected its focus to seek out opportunities within already developed areas, focusing redevelopment and reinvestment in existing communities. The M-NCPPC has especially focused on existing commercial centers and transportation corridors, bringing a new mix of uses and an emphasis on public transportation to the County.

**Issues**

The M-NCPPC created an inventory of over 100 commercial centers located in Montgomery County. In doing so, the M-NCPPC found that these centers covered 1,550 acres, over one-half of the commercial centers were over fifty years old, and a quarter of them were candidates for redevelopment; including housing opportunities.[2] As Montgomery County matures and vacant sites become less available, these existing centers provide significant opportunities for redevelopment. The majority of the existing centers are comprised of strip commercial centers without a sense of place, and are frequently located at highly visible suburban crossroads.

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[1] According to the U.S. Department of Housing and Urban Development, the area median income for the Washington region in 2004 was $85,400, which is the 7th highest median income in the Country.

[2] The M-NCPPC considers a center candidates for development when the land becomes more valuable than the existing development

Although near major transportation corridors, these centers often lack convenient pedestrian connections within and between other commercial centers.

The M-NCPPC sees the opportunity to take existing commercial centers that lack an identifiable sense of community and redevelop them into thriving neighborhood centers. The challenge is determining how to do it. Currently, many commercial centers are not zoned for residential uses, yet obsolete uses such as abattoirs and blacksmith shops fall within the parameters. The M-NCPPC recognizes that if housing were allowed, new development in the existing centers could accommodate over 9,300 residential units at a mere 6 units per acre and that number could increases to 23,200 units if the density were increased to 15 units per acre.[3]

**The Assignment**

Recognizing the challenge of how to improve existing commercial centers to create neighborhood centers with a mix of housing opportunities, the M-NCPPC invited ULI Washington to convene a Technical Assistance Panel (TAP) on July 12-13, 2005. A twelve member panel spent an intensive one and one-half days touring a selection of representative commercial centers, participating in a briefing led by the M-NCPPC, and spending a full day behind closed doors deliberating on the presented issues and formulating recommendations.

In the context of the challenges outlined above, the M-NCPPC asked the panel to:

- Provide a justification for redeveloping mature commercial centers;
- Create a vision for what the redevelopment should entail;
- Create prototypes for redevelopment;
- Offer successful principles for redevelopment;
- Outline the challenges that must first be overcome; and
- Provide the M-NCPPC with tools and action steps to achieve the vision.

After finalizing its recommendations, the panel presented its findings to the staff and guests of the M-NCPPC.

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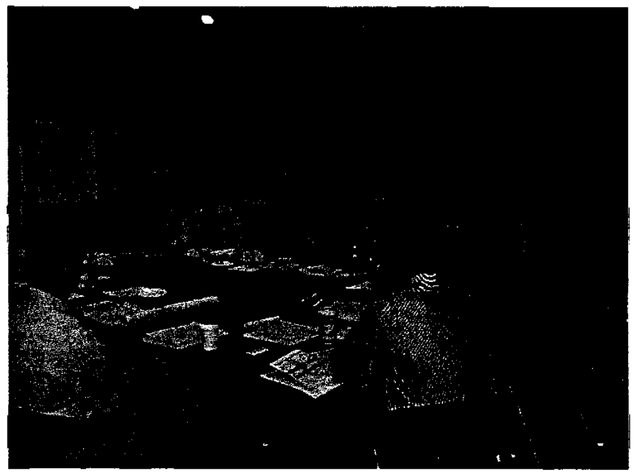
[3] These figures assume development on all 1,550 acres included in the inventory but does not take into account additional new commercial development that would occur on the same parcels.

# Introduction and Summary of Recommendations

Montgomery County is part of a large metropolitan area that is experiencing strong growth. In February 2005, ULI Washington held Reality Check, a regional visioning exercise where 300 elected officials and community, environmental, housing and business leaders in 20 jurisdictions met to consider how to accommodate the additional 2 million people and 1.6 million jobs proposed for the Washington metropolitan region by the year 2030.[4] While many jurisdictions will share in determining where to place this growth, few jurisdictions have as finite an amount of land available to house these people as Montgomery County. The panel therefore applauds the M-NCPPC for participating in Reality Check and taking the initiative to begin planning for the anticipated growth, in order to create a strong community for both existing residents and newcomers to live, work and play.[5]

The M-NCPPC has joined progressive metropolitan planners country wide in its shift towards reinventing suburban strips. According to the Urban Land Institute's publication *The Ten Principles for Reinventing America's Suburban Strips*, this shift reflects both the growing success of many downtown revitalization efforts and the realization that suburban commercial centers are not physically integrated in communities and are becoming unsustainable; Montgomery County's commercial centers are no different.



**Panel members discuss the presented issues and opportunities.**

After reviewing the inventory of Montgomery County's centers, and touring a number of sites in close proximity to the M-NCPPC's offices, the panel concluded that there was ample opportunity to redevelop these centers into neighborhood centers. The panel created a vision for these centers that reinforced a sense of place through the development of community streets with a mix of uses, housing, pedestrian connections and access to transportation.

The panel began by looking at the market potential for redevelopment and determined that while the market will vary depending on the centers' location, there is significant demand for new housing and sustainable retail, making the redevelopment initiative very acceptable. The challenges for successful redevelopment will be to create the infrastructure that will link surrounding roads and connect adjacent sites to the centers. The physical barriers that surround these sites need to be removed. The panel also emphasized the importance of parking. Parking is the greatest challenge in adding density to a site and a key element in the break down of site redevelopment. Another obstacle is the space constraints and high cost of providing structured

[4] Figures provided by the Metropolitan Washington Council of Governments
[5] For more information on Reality Check visit www.realitycheckwashington.org

parking and meeting market demands for parking. There is therefore a need to coordinate redevelopment with other forms of transportation such as bus, rail, flex-car and walking. The regulatory process will also be a challenge for redevelopment. In the panel's opinion, in order to ensure successful redevelopment, the approval process will need to become streamlined.

In order to prioritize development for the centers, the panel found it necessary to categorize the centers based upon their size and function. Four categories were created: Small, Medium, Large and Transit Influenced. Small Centers included unanchored centers of five or fewer acres; Medium Centers included centers on five to fifteen acres with one anchor; Large Centers are categorized as over fifteen acres with two or more anchors; Transit Influenced Centers are within 2000 feet of transit or multi-modal transportation hubs.

The panel determined that due to their size, Small Centers were not the primary focus for redevelopment, but that Medium and Large Centers could achieve the panel's vision for redevelopment. The panel also created the Transit Influenced category, which in the panel's opinion includes centers that are suitable for redevelopment, but should be included in the M-NCPPC's guidelines for transit-oriented development.

In order to redevelop the Medium and Large Centers, the panel recommends creating a master plan for housing that includes an overlay zone that can be applied to the inventory of commercial centers. The panel recommends that the overlay zone provide for a mix of needed uses including housing. The panel recommends that 75% of new development within the centers be for housing and that 25% of that housing development be set aside for affordable and workforce housing. The panel also recognized the need to preserve retail, requiring that the existing supply of retail be maintained or expanded.

Within the overlay zone, the panel set forth planning and design guidelines to help shape and create sustainable neighborhood centers. Guidelines include orienting the redeveloped centers to create community streets achievable through, intensified landscaping, higher architectural standards and amenities.

## Market Opportunities and Challenges

While reinventing the existing commercial centers to include housing and a wider mix of uses, is definitely warranted, it is important that the M-NCPPC know its market. Not all of the centers in Montgomery County's inventory will respond to the panel's recommendations similarly. What will work in one center may not work in another. The demographics, corridors and immediate trade area will determine the potential and timing for each center's redevelopment.

**Opportunities**

The initiative taken by the M-NCPPC to improve upon its existing commercial centers by creating neighborhood centers that include housing provides tremendous opportunities for current landowners and residents alike. Currently, there is no development potential for housing in most existing retail centers due to their zoning. The M-NCPPC can capitalize on the changed zoning to meet unmet market demands.

Housing. There is a recognized need for more affordable and workforce housing. While the County's Moderately Priced Dwelling Unit (MPDU) program has been successful, creating approximately 11,000 units of affordable housing, the supply does not meet the growing demand. The Housing Opportunities Commission currently has 7,000 families waiting for public housing, and 10,000 families waiting for vouchers.

While the MPDU program is available for those with an Area Median Income (AMI) of 65% or less, the panel applauds the County for recognizing the underserved workforce housing market between 65% and 120% of the AMI.[6] The County has the opportunity to institutionalize a program to serve this market by creating set asides for workforce housing, as part of the new redevelopment opportunities at these centers.

Retail. Preserving retail development is extremely important when improving existing centers. With the 7th highest median income in the nation and the expected growth of housing and jobs, there will be growing demand for goods and services. Retail development also provides tax revenues to the County. By maintaining or even increasing the level of retail within these existing centers, the County will have the opportunity to leverage that increased tax revenue to offset the cost of other initiatives. The importance of the preservation of retail development should be stressed in the existing commercial centers.

**Challenges**

While landowners will receive new opportunities with the increased flexibility in uses and density for redevelopment, the benefit does not come without costs. While the landowner bears limited direct costs associated with the rezoning of land, the necessary steps that an owner must accomplish prior to being able to begin redevelopment significantly increase the cost of redevelopment by 20% - 50%. The additional density on the site does not guarantee increased revenue to the land owner.

[6] According to the U.S. Department of Housing and Urban Development, the area Median Income for the Washington region in 2004was $85,400.

Infrastructure. Over 50% of the existing centers were built in the 1950s or earlier, long before underground utilities were required. Redevelopment of the centers would undoubtedly require the land owner to reconfigure utilities. Sidewalks, roads, ingress and egress points will likely have to change, adding additional costs to the redevelopment.

The panel was also concerned with issues surrounding storm water management. Currently the surfaces are almost 100% impervious, providing little place for storm water management facilities. The cost and process required to properly address storm water management will be significant.

Parking. The panel has found that parking requirements need to be maintained. Unless a project site is located in a Central Business District (CBD) or is within walking distance of a Metro stop, the ratio of 5 spaces per 1000 square feet remains the rule. The market drives the parking requirement, not the code. In the panel's experience, the code has actually proven to be deficient, requiring less parking than needed within the center. While the idea of shared parking works well with some uses and the panel encourages it for office and retail development, it has not proven successful for housing. Residents require dedicated parking spaces and housing projects typically provide 1.5 parking spaces per unit, adding further to the parking requirement. Parking is often the most difficult obstacle to adding density to a project, a key reason why these types of projects will break down. Development should focus on making the parking work.


**Panel members create prototypes for redevelopment**

The other challenge that parking structures face, is that retailers prefer parking fields as opposed to parking structures. If the center is in a close-in location with a captive trade area, then structured parking will not turn away a retailer. The panel advises the M-NCPPC however that it may be difficult to attract retailers to lesser known centers with parking structures.

Economic. Negotiations with long term and reluctant tenants will also prove to be a significant cost to the land owner. Retailers that are currently successful may have little incentive to agree to redevelopment. Long term tenants such as anchors are also difficult to persuade. For tenants to give up their parking area, temporarily close their doors, or be bought out entirely will pose a significant cost to land owners.

The associated cost of affordable and workforce housing will also take its toll on the financial model. Developers of affordable housing decrease their revenue with each affordable unit and hope to break even with workforce housing units. Requiring both types of housing on site will reduce the overall revenue of the project and may result in the reduction of other amenities.

Owners. Land owners themselves may have their reasons for not wanting to affect the reliable and predictable return on investment that they currently receive from these centers. Many of the existing sites are owned by publicly held companies, and to upset the current shopping center model may not be well received by shareholders. Furthermore, Real Estate Investment Trusts (REITs) own a large number of the sites and to redevelop the centers with condominiums would require selling the land or entering into long-term ground leases. REITs are not interested in giving up control of their centers or altering their business model from rental uses.

Community Outreach. The M-NCPPC may also find community opposition to the redevelopment of the centers. Community members may oppose change, wanting to preserve the existing neighborhood services. They may also voice concerns about the toll that additional residents and patrons of the centers may have on roads and schools. The outreach process is also a concern. The M-NCPPC must augment the political process by building on its initiatives to better engage community members.

# Redevelopment Strategies

In order to begin to plan for the redevelopment of Montgomery County's retail centers, there first needs to be a vision for the redevelopment of centers. Given what the panel heard from the M-NCPPC staff and what has proven to be successful in other centers, the panel believes that revitalized centers should reinforce a sense of place through the development of community streets. These community streets should have strong pedestrian connections to create a walkable, pedestrian friendly environment. Civic space and amenities should be integrated into the centers creating the identity for the neighborhoods in which they are located.

Revitalized centers should increase their current density to accommodate market rate, work force and affordable housing. Large parking fields should be transformed to accommodate structured parking and residential units, and additional housing should be included over retail development. Where feasible, these centers should also provide for multi-modal transportation with linkages to public transportation, bike paths and trails.

**Redevelopment Criteria**
While the majority of the centers inventoried could accommodate housing and therefore are fit for redevelopment, the panel recognizes that the centers will not be redeveloped at once. To begin to prioritize the sites for redevelopment, the panel looked at a set of criteria that the M-NCPPC could use to determine whether the site is ready for redevelopment.

Transportation Corridors. Redevelopment should be integrated along designated transportation (transit) corridors. Given the known benefits of public transportation and the mix of housing that is desired within these centers, redevelopment along transportation corridors should be a priority.

Civic Identity. Centers with a lack of strong civic identity should be targeted for redevelopment in order to enhance the neighborhood's identity and help create a sense of place.

Economic Life. Centers at or nearing the end of their economic life should also take priority. The age of the center may not by itself warrant redevelopment. As discussed under Market Potential, if the center is successful, owners may not want to disrupt the center. There are a number of centers that are underperforming and clearly at the end of their economic life span. Those centers with empty storefronts or whose tenant base does not meet the needs of their surrounding communities should be prioritized.

Neighborhood Transition. The panel noted there that are centers in Montgomery County that have remained static, although the surrounding neighborhood has changed considerably. Priority should be given to those centers where there is an opportunity for redevelopment to mirror changes in the community.

Accessibility and Visibility. Accessibility and visibility are keys to a successful center. Improving upon those centers that already have good accessibility and visibility should be a priority. Those centers that lack access and visibility should be targeted if that access is achievable.

Connections. The panel noted that if planned properly, many of the commercial centers could connect to adjacent commercial uses. Those centers with poor connectivity should be a focus for redevelopment.

Configuration and Depth of parcel. As the panel will further elaborate below, given the requirements and demands of larger tenants such as grocers, the depth of the parcel could limit the potential for redevelopment. Deeper parcels with room to accommodate service vehicles as well as a residential component should be placed ahead of narrow parcels.


Narrow parcels are less likely candidates for housing

Catalysts. The M-NCPPC should also look at the potential for redevelopment of the sites to act as a catalyst for further development in the community. Those parcels that have the potential to cause surrounding sites to redevelop would create a larger impact.

Relation to Others. Those centers that relate and contribute to the vision for a greater mixed-use node should be targeted for redevelopment.

In order to determine how to redevelop the sites, the panel felt that a framework for the centers should be created. By dividing the centers into four categories, the panel believes that the M-NCPPC could better evaluate redevelopment opportunities. The panel found that the identity and uses of centers were different depending upon the center's size. Centers less than five acres behaved differently than centers between five and fifteen acres, and those centers larger than fifteen acres had different opportunities and challenges than those under fifteen acres. The panel also noted that there were centers within the inventory with such close proximity to transit that entirely different opportunities were present.

**Small Centers**

Defined by the panel as centers less than five acres, 'Small Centers' are unanchored and have less than 50,000 square feet of commercial space. Centers of this scale are made up of mom and pop shops whose goods and services match the market in which they are located. These centers are often food oriented and often have fewer tenants with strong credit. Small Centers rely on access and visibility for success, require more parking because of the tenant mix, and are usually located in established neighborhoods. While small, these centers generally have a strong civic identity and redevelopment meets greater neighborhood resistance.

When reviewing these sites and their potential for redevelopment, the panel did not see these centers as providing a significant opportunity for housing. Small Centers tend to be on narrower sites, and once the bays required for servicing the retail are considered, there is little land left, making the density needed to support redevelopment difficult to create.

In the case of the Small Center, the panel recommends looking at these centers on a site-by-site basis. Unless the economics are in place and the site could accommodate greater than 100 units of housing, while still providing the parking needed to support the retail, the panel does not view Small Centers as candidates for significant housing additions.

While the panel concluded that the Small Centers will not be the force behind adding housing to the County, there are things that can be done to improve upon what is currently in place. These Small Centers are often near larger centers and adjacent to other services, providing the opportunity for connections. By increasing inter-parcel connections, the M-NCPPC could help to reduce the traffic burden on the centers' corridors. Small Centers can also benefit from improvements to building design, lighting, graphics, signage, landscaping and storefronts.

**Medium Centers**

The panel calculated that 90% of Montgomery County's commercial center inventory fits into the 'Medium Center' category. Sized between five and fifteen acres, Medium Centers generally have between 50,000 and 150,000 square feet of commercial space. Medium centers are often anchored by a grocery store and have one or more pad sites for a bank, a gas station, or a fast food restaurant. A main difference between small and medium centers is that the external pad sites within the center are often sold to the users and therefore the center has multiple owners making it inherently more difficult to gain control over development. Similarly, the large anchors in these centers often hold long term leases that also create redevelopment challenges.

Medium Centers are neighborhood serving, located on major roads, and rely heavily on visibility and ample parking. The parking ratio for these sites is generally five spaces for every 1,000 square feet of commercial space, and grocery stores mandate that they have 250 parking spaces directly outside of their front door. The remaining tenant make-up is generally composed of credit worthy tenants, strong mom and pop shops, and restaurants or other food options.

What makes these sites ideal for redevelopment is that Medium Centers are located along major corridors and typically have a strong ratio of depth to width which supports a range of uses and provides redevelopment opportunities. Medium Centers also have large, consolidated parking fields, providing the opportunity to add housing and structured parking. The Medium Centers that the panel members toured and recognized from the inventory are typically weak in design and offer few amenities to the community outside of the retailers' goods and services. The panel therefore sees great opportunity to brand these Medium Centers by adding a large housing component, civic uses and amenities; creating a synergy that revitalizes not only the center, but the greater community.

The challenges to redeveloping these centers primarily lie in the ownership and lease structures. The negotiation process between multiple owners can be difficult when redevelopment would mean upsetting the current tenant based and in some cases already high yields. Grocery stores with long term leases can also prove difficult to persuade, seeing very little reason to agree to disrupt their parking and store operator in order to accommodate redevelopment. Grocery stores also have significant service and loading requirements which must be respected in the redevelopment process.

**Large Centers**
The 'Large Center' category includes those centers over fifteen acres with more than 150,000 square feet of commercial space. Typically centers with two to three anchors as well as junior anchors (10,000 – 30,000 square feet) make up this category. Like Medium Centers, Large Centers have external pad sites with multiple owners, long term leases and large parking fields. Large centers typically have multiple points of ingress and egress and unlike the Small and Medium Centers, Large Centers typically have a much larger trade area drawing shoppers from both within and outside of the community.

Given the fact that these centers are on large parcels with large parking fields, Large Centers have the most flexible sites and offer maximum redevelopment opportunities. The panel believes that public uses and amenities can and should be supported within these Large Centers; helping to increase the mix of uses. To a greater extent than found in Medium Centers, Large Centers typically have multiple owners and multiple tenants with long term leases that could hinder or spoil opportunities for redevelopment. The sites themselves will take longer to redevelop and should be done in phases over a number of years.

**Transit Influenced Centers**
After reviewing the inventory of commercial centers, the panel believes that a fourth category is warranted. The Mid-Pike Plaza fits into the framework of a Medium Center, but its proximity to transit warrants a more intense redevelopment consistent with the county's Transit Station Mixed (TSM) Zone. Medium and Large Centers within 2000 feet of a Metro station fit this category of Transit Influenced Center.[7]

| CENTER | ACREAGE | CATEGORY |
|---|---|---|
| Seminary Place | 3.844 | Small |
| Stoney Mill Square | 13.456 | Medium |
| Hillandale | 14.446 | Medium |
| White Oak | 27.835 | Large |
| Mid-Pike Plaza | 10.057 | Transit Influenced |

**Above are the Montgomery County centers toured by the panel, their acreage and corresponding category.**

[7] Currently the Transit Station Mixed (TSM) Zone applies to projects within 1500 feet of a Metro Station.

## Planning and Design Principles

In order to ensure that the M-NCPPC's vision of a neighborhood center is executed, the panel recommends that the M-NCPPC develop design guidelines. While not as formal and rigorous as a Form Based Code, the panel believes that guidelines need to be in place to ensure consistent, sustainable redevelopment with a sense of place and a relationship to their environment. Redevelopment should focus on a main street form of development with community spaces and a comfortable pedestrian focus.

Orientation. Community street developments bring the buildings to the street, reducing setbacks and providing sidewalks that create pedestrian connections and create an urban environment. While parking requirements for anchors may hinder the overall effect of a community street environment, other design principles will enhance this sense of place.

Residential over Retail. A key element in an urban environment is placing residential over retail. This mix of uses has been very successful and should be used as a means to add housing to the projects, particularly those in more dense locations. This mix of uses reverts back to the way development used to occur and can still be found on main streets in most towns, further enhancing the vision of the M-NCPPC.

Amenities. The amenities that are integrated into a project play a tremendous role in creating the identity for the center. The fountain at Bethesda Row has become the focal point of the downtown project, defining the project and its sense of place. Other amenities such as mature trees and landscaping, wide sidewalks, community spaces, and streetscaping elements will enhance the community.

Architectural Standards. The panel strongly believes that high architectural standards should be required in the design guidelines in order to ensure appropriate development. The panel also encourages the architectural standards to consider surrounding uses. By blending the centers with surrounding development, community members will be less inclined to oppose the project.

**Large parking fields should be replaced with structured parking making room for housing.**

Green Development. Eco-friendly green development is costly and while ideal, is not always financially viable. While the panel does not believe that strict guidelines should be set for green development, the panel encourages the M-NCPPC to consider providing subsidies or incentives to those developers who take the initiative to integrate green development into their projects. Green roofs are a good example of how existing centers can incorporate green development.