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1 we have a second to defer. Any discussion?
 2 MR. COLLER: Wait.
 3 CHAIRMAN AIZENSTAT: Go ahead, please.
 4 MR. COLLER: Are we -- I think we need to
 5 defer to a date certain.
 6 CHAIRMAN AIZENSTAT: To the next meeting.
 7 MR. WITHERS: The next meeting.
 8 MS. GARCIA: I think it's deferred to when
 9 the City Manager is available, I think it is --
 10 MR. COLLER: Okay. So then it would have
 11 to be re-advertised.
 12 MS. GARCIA: Exactly. Yeah.
 13 MR. COLLER: So it will be deferred to when
 14 the City Manager can come and make a
 15 presentation.
 16 CHAIRMAN AIZENSTAT: Is that okay that way?
 17 MR. COLLER: Yes, which means that it will
 18 have to be re-noticed and re-advertised,
 19 because we don't have a date certain at this
 20 point.
 21 MR. BEHAR: Is that okay with the City?
 22 MS. GARCIA: Correct.
 23 CHAIRMAN AIZENSTAT: Is that okay with the
 24 City?
 25 Suramy, you're okay with the City -- we'll

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1 So, Chip, that's your motion, to defer it
 2 to the next meeting, until the 14th --
 3 MR. WITHERS: It's your birthday; isn't it?
 4 CHAIRMAN AIZENSTAT: No.
 5 MS. MIRO: Fourteen days after mine.
 6 MR. WITHERS: I knew it was somebody's
 7 birthday.
 8 Yes, that's my motion.
 9 CHAIRMAN AIZENSTAT: Mine is close.
 10 Do we have a second?
 11 MS. MIRO: I second.
 12 CHAIRMAN AIZENSTAT: Any discussion? No?
 13 Call the roll, please.
 14 THE SECRETARY: Chip Withers?
 15 MR. WITHERS: Yes.
 16 THE SECRETARY: Venny Torre?
 17 MR. TORRE: Yes.
 18 THE SECRETARY: Luis Revuelta?
 19 MR. REVUELTA: Yes.
 20 THE SECRETARY: Claudia Miro?
 21 MS. MIRO: Yes.
 22 THE SECRETARY: Robert Behar?
 23 MR. BEHAR: Yes.
 24 THE SECRETARY: Eibi Aizenstat?
 25 MS. MIRO: Yes.

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1 have to re-advertise or would the Manager like
 2 to come in at the next meeting?
 3 MS. CABRERA: I think he would make himself
 4 available for the next meeting.
 5 CHAIRMAN AIZENSTAT: Okay. That was my
 6 understanding.
 7 MS. CABRERA: That was my understanding
 8 with the phone call with him now.
 9 CHAIRMAN AIZENSTAT: So you'd like to do it
 10 to a time certain to the next meeting.
 11 MS. CABRERA: Yes.
 12 CHAIRMAN AIZENSTAT: That's the City's
 13 position.
 14 MR. COLLER: Okay.
 15 CHAIRMAN AIZENSTAT: We have a motion to
 16 defer to the next meeting.
 17 MR. COLLER: What's the date of that
 18 meeting?
 19 CHAIRMAN AIZENSTAT: Jill?
 20 THE SECRETARY: December 14th.
 21 MR. COLLER: So December 14th. So there
 22 would be no further notice, because we're
 23 giving the notice now.
 24 CHAIRMAN AIZENSTAT: Correct. So there's
 25 no advertisement that would be necessary.

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1 MR. COLLER: Mr. Chair, should we take a
 2 five-minute break for the court reporter?
 3 CHAIRMAN AIZENSTAT: Can we do a six,
 4 six-minute?
 5 MR. COLLER: Six minutes should be fine.
 6 MR. BEHAR: What is the next item?
 7 THE SECRETARY: Item G-2 and G-3 are related.
 8 MR. REVUELTA: I'm going to have to go.
 9 CHAIRMAN AIZENSTAT: Okay. If you have to
 10 go -- I think Claudia has to go, do we have a
 11 quorum? One, two, three -- we only have four
 12 left.
 13 MR. COLLER: We have a quorum.
 14 CHAIRMAN AIZENSTAT: We have a quorum.
 15 For the record, let's note that Claudia
 16 Miro is leaving the meeting and so is
 17 Luis Revuelta. Let's take a five-minute break,
 18 please.
 19 (Short recess taken.)
 20 CHAIRMAN AIZENSTAT: We're going to
 21 continue with the meeting, please. Thank you.
 22 So we are back in session. Mr. Coller, if
 23 you could please read the next item into the
 24 record.
 25 MR. COLLER: Item G-3, an Ordinance of the

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1 City Commission of Coral Gables, Florida
 2 providing for a text amendment to the City of
 3 Coral Gables Official Zoning Code by amending
 4 Article 15, "Notices" to require online
 5 publication of historical determination letters
 6 and Article 8, "Historic Preservation" revising
 7 the process of historical determination
 8 letters, providing for severability clause,
 9 repeater provision, codification, and providing
 10 for an effective date.
 11 Item G-3, public hearing.
 12 CHAIRMAN AIZENSTAT: I think the
 13 microphones are not working, even though they
 14 are on. I don't know if the court reporter is
 15 able to hear it, and I don't know if it's being
 16 televised.
 17 It's just for the record. So maybe we
 18 ought to just -- we're going to have to speak
 19 up.
 20 MR. BEHAR: No problem.
 21 CHAIRMAN AIZENSTAT: Go ahead, Jennifer.
 22 MS. GARCIA: So this text amendment is
 23 sponsored by the Commission. The concern is,
 24 when Historic gets a determination letter
 25 issued, they're not publicized, they're not

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1 CHAIRMAN AIZENSTAT: Okay.
 2 MS. GARCIA: Yeah, they're both Historic
 3 related. I have -- yes.
 4 MR. ADAMS: Warren Adams, Preservation
 5 Officer.
 6 Any time someone requests demolition of a
 7 property, they are required to come through my
 8 office, for me to determine whether the
 9 property is eligible to be historically
 10 designated or not.
 11 If we determine it as eligible for
 12 designation, we must take the designation
 13 report to the Preservation Board. If I
 14 determine that it is not eligible, then the
 15 Code, at the moment, does not prevent someone
 16 from submitting a designation application even
 17 after I've made the determination.
 18 This issue came up, because recently I
 19 received a designation application for a
 20 property I determined had no significance over
 21 a year ago. So a year later, after I've made
 22 the determination, someone submitted a
 23 designation report for a property.
 24 What this process seems to do is, the
 25 Commission felt that there should be more

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1 brought to the public, and the public feels
 2 like they're behind, I guess, when these
 3 determinations are made.
 4 So the sponsored text amendment is to
 5 require they be posted online and that there is
 6 a clarified appeal process that they can go
 7 through.
 8 Oh, I've come back on. That's nice. Good.
 9 So they would have had the appeal within
 10 ten days, which is pretty standard, as far as
 11 appeal processes go, but they would be required
 12 to submit within 21 days an actual completed
 13 administrative report with that appeal, that
 14 they feel that this property is historic and
 15 that they know the history behind it, and they
 16 are going to submit something within 21 days
 17 with that appeal.
 18 MR. BEHAR: Am I looking at the same,
 19 because this is the notices, right?
 20 MS. GARCIA: It's item G-3, which has the
 21 Staff report of two items.
 22 MR. BEHAR: Okay.
 23 CHAIRMAN AIZENSTAT: G-3 and G-4 are the
 24 same Staff reports.
 25 MS. GARCIA: Yes. Correct.

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1 transparency when I issue these letters. So
 2 the letters will be published online, for the
 3 public to see. Within ten days, a member of
 4 the public, a resident, has the right to submit
 5 a notice of intent to appeal, and if they do
 6 that, they have 21 days to submit a completed
 7 Historic designation report.
 8 CHAIRMAN AIZENSTAT: And then what's the
 9 process after that?
 10 MR. ADAMS: If I still determine the
 11 property is not eligible, I deny it, but they
 12 do have the right to take it forward to the
 13 Preservation Board. If the Preservation Board
 14 recommends denial, they would have a right to
 15 appeal to the City Commission.
 16 So that is generally what this is intending
 17 to do, transparency, and allow members of the
 18 public the right to appeal my determination, if
 19 I determine it is not Historically significant.
 20 CHAIRMAN AIZENSTAT: But the process is the
 21 same?
 22 MR. ADAMS: The process is the same. The
 23 only difference is, at the moment, they can
 24 submit a designation application a year after I
 25 submitted my initial determination saying it's

1 not significant.
 2 CHAIRMAN AIZENSTAT: Yes, Venny.
 3 MR. TORRE: No, I understood the point.
 4 How long are the letters that you are providing
 5 now good for? This one was a year later. How
 6 long do they stay --
 7 MR. ADAMS: They're valid for 18 months,
 8 and then the property owner must re-submit. If
 9 the letter expires and the property owner has
 10 not re-submitted, a member of the public can
 11 submit a designation application then, but
 12 there's nothing in the Code at the moment that
 13 prevents someone submitting a designation
 14 application any time after I've made my
 15 determination.
 16 MR. TORRE: And the timing -- so there's 21
 17 days for them to give you the designation
 18 report, which could be good, bad or
 19 indifferent. They're just going to provide you
 20 with something they feel is adequate?
 21 MR. ADAMS: This is one of the issues.
 22 It's going to be up to me to determine if the
 23 designation report is sufficient. It's almost
 24 certain, in most cases, that they will not be
 25 as thorough as the designation reports that our

1 eligible --
 2 MR. WITHERS: Right. That was my point.
 3 MR. ADAMS: -- it's normally the property
 4 owner that would actually appeal the
 5 designation when it goes -- they would go to
 6 the Preservation Board. They would argue their
 7 case.
 8 MR. WITHERS: Okay. I got it. I got it.
 9 MR. ADAMS: Yes.
 10 MR. TORRE: So -- how can I say this?
 11 CHAIRMAN AIZENSTAT: Just say it.
 12 MR. TORRE: If there's a continual coming
 13 to you, over and over, "This one shouldn't have
 14 gone this way; no, this one shouldn't have gone
 15 this way," and now, all of a sudden, you're
 16 feeling the same pressure from the same person
 17 or group four or five times, what happens?
 18 MR. ADAMS: Yeah. My issue is, I've
 19 already made the determination. Unless they
 20 come up with something which I overlooked or
 21 missed, or -- you know, I'm not sure why my
 22 determination would be different, because we do
 23 thorough research on these, and, you know,
 24 unless a property was built in the 1980s or
 25 something and it's a clear, no, this isn't

1 department provides. So that is a potential
 2 issue, if I determine something is insufficient
 3 to go forward, would they still have to right
 4 to take it to the Board.
 5 MR. TORRE: If that happens -- so they give
 6 you a semi produced report, you deny it. Does
 7 the Historic Board review that same package
 8 that you just sort of denied? There's no
 9 additional --
 10 MR. ADAMS: There's no additional, unless I
 11 say to them, "You know, you're going to have
 12 to, you know, add more information to this
 13 report."
 14 MR. WITHERS: So who can file the appeal,
 15 anybody, City-wide?
 16 MR. ADAMS: Any resident, yes.
 17 MR. WITHERS: Any resident, City-wide, can
 18 file it?
 19 MR. ADAMS: Yes.
 20 MR. WITHERS: And they can file an appeal
 21 whether you give the letter of determination in
 22 a positive or give a determination letter in
 23 the negative?
 24 MR. ADAMS: Normally the negative comes
 25 from the property owner. So if I say it's

1 eligible.
 2 But of tricky ones, come those properties
 3 built in the '40s and '50s, but if I make a
 4 determination that it's not eligible, then a
 5 designation report can still be submitted, but
 6 unless there's some information in there that I
 7 missed or haven't found, my determination would
 8 possibly be the same.
 9 MR. TORRE: It just seems to me that there
 10 could be some anti-development reasons for
 11 these to filed for whatever. I mean, it's just
 12 what happens, and then this becomes a big deal,
 13 and you're facing something that is not even
 14 worth -- and, again, when you guys do it, your
 15 Staff reports have very much -- you know,
 16 there's a big vet in there. I'm just concerned
 17 that then you're still relying on having this
 18 process take 21 days and it's still with the
 19 same piece of paper, that doesn't mean any --
 20 MR. ADAMS: Well, I think the other thing
 21 to consider is, you submit a letter of
 22 determination to me. I have 45 days to make
 23 the determination. So the determination is
 24 then published. If someone wishes to appeal,
 25 they have 10 days to submit their intent to

1 appeal, and then 21 days to submit the
 2 designation application. I then maybe take a
 3 week or two to review it, and if I say, no,
 4 it's probably going to take five or six weeks
 5 to get it to the Preservation Board. If the
 6 Preservation Board denies it, it's then
 7 potentially going to be another four weeks
 8 before it goes to Commission.
 9 But I must stress, at the moment, that the
 10 Code allows people to do that. The only
 11 difference is, there isn't this time
 12 constraint. They can submit it a year after
 13 the determination has been issued.
 14 MR. WITHERS: And that's the same if the
 15 City is the appellant, as well?
 16 MR. ADAMS: It would be, although I don't
 17 believe I've ever seen the City appeal one --
 18 MR. WITHERS: But, I mean, if the City
 19 itself wanted to appeal a decision from a Board
 20 or an action?
 21 MR. ADAMS: Yes. I believe it's ten days
 22 to submit the notice of intent and then however
 23 long -- I'm not sure that it's 21 days to
 24 submit for a re-appeal. I believe it is.
 25 CHAIRMAN AIZENSTAT: Interesting. Thank

1 MR. BEHAR: This is just on -- this item,
 2 G-3, is not a companion with --
 3 CHAIRMAN AIZENSTAT: G-4?
 4 MR. BEHAR: -- G-4?
 5 CHAIRMAN AIZENSTAT: We're just voting on
 6 G-3 right now.
 7 MR. TORRE: So just to clarify, before I
 8 leave this, you're going to post any letter
 9 that you give out on some platform online, and
 10 that will happen so that anybody that keeps up
 11 with it, is going to see all of the stuff that
 12 you're saying is not Historically worthy?
 13 MR. ADAMS: Yes.
 14 MR. BEHAR: And they could appeal that,
 15 because you're going to post it up and they
 16 could appeal it?
 17 MS. GARCIA: Yeah.
 18 MR. TORRE: I mean, I get it and I, you
 19 know, obviously, openness and transparency is a
 20 good thing. I see some ulterior motive and
 21 people maybe using this as a --
 22 MR. WITHERS: The people that have been in
 23 the process are probably going to be the ones
 24 that are going to be appealing it, anyway? You
 25 think you're going to draw --

1 you.
 2 Is that the City's presentation?
 3 MS. GARCIA: Yeah.
 4 CHAIRMAN AIZENSTAT: Jill, do we have
 5 anybody in Chambers for this item?
 6 THE SECRETARY: No.
 7 CHAIRMAN AIZENSTAT: Anybody on Zoom?
 8 THE SECRETARY: No.
 9 CHAIRMAN AIZENSTAT: Anybody on the phone
 10 platform?
 11 THE SECRETARY: No.
 12 CHAIRMAN AIZENSTAT: At this point, I'd
 13 like to go ahead and close it for public
 14 comment.
 15 Any further discussion from anybody,
 16 questions? Anybody would like to make a
 17 motion?
 18 MR. WITHERS: I'll move it.
 19 CHAIRMAN AIZENSTAT: Chip makes a motion to
 20 move. As presented?
 21 MR. WITHERS: Yes.
 22 CHAIRMAN AIZENSTAT: Is there a second?
 23 MR. TORRE: I'll second it.
 24 CHAIRMAN AIZENSTAT: Venny seconds.
 25 Any discussion?

1 MR. TORRE: No. No, that's correct.
 2 MR. WITHERS: It's the people that have
 3 already been involved.
 4 MR. TORRE: That care and watch this and
 5 stay tune with what's going on.
 6 MR. WITHERS: And groups.
 7 MR. TORRE: Yeah.
 8 CHAIRMAN AIZENSTAT: Any further
 9 discussion? No?
 10 Call the roll, please.
 11 THE SECRETARY: Chip Withers?
 12 MR. WITHERS: Yes.
 13 THE SECRETARY: Venny Torre?
 14 MR. TORRE: Yes.
 15 THE SECRETARY: Robert Behar?
 16 MR. BEHAR: No.
 17 THE SECRETARY: Eibi Aizenstat?
 18 CHAIRMAN AIZENSTAT: No.
 19 MR. COLLER: So we have a tied vote. You
 20 could try to break the tie or just go as no
 21 recommendation. Do we have two yeses, two nos?
 22 THE SECRETARY: Correct.
 23 MR. COLLER: So it goes as no
 24 recommendation, or you could have another
 25 motion, if you think you can reach consensus.

1 MR. TORRE: Is there anything that
 2 particularly bothers both of you?
 3 CHAIRMAN AIZENSTAT: For me, my concern is
 4 people that for no reason or rhyme are just
 5 going to go ahead and appeal.
 6 MR. BEHAR: I agree.
 7 CHAIRMAN AIZENSTAT: That's my concern.
 8 MR. BEHAR: I agree.
 9 CHAIRMAN AIZENSTAT: I have no objections
 10 with posting. I think it should be posted, and
 11 it should have been posted all along, but I
 12 think --
 13 MR. BEHAR: And I'm putting more burden on
 14 that property owner that --
 15 CHAIRMAN AIZENSTAT: Because we have an
 16 expert that makes that determination and there
 17 are Boards and there are people that review and
 18 so forth, and you do a very thorough job, a
 19 deep dive.
 20 MR. BEHAR: A fantastic job.
 21 MR. ADAMS: Thank you.
 22 CHAIRMAN AIZENSTAT: So, to me, it's
 23 just -- that's why.
 24 MR. BEHAR: From me, it's simply that, that
 25 it opens up for anybody else that, you know,

1 community asking which ones have been issued
 2 that month.
 3 CHAIRMAN AIZENSTAT: But they still have
 4 the same process?
 5 MR. ADAMS: Yes. They can still submit a
 6 designation application. The only difference
 7 is, this is at least limiting the amount of
 8 time they have to do so, because we recently
 9 received one for a determination that was made
 10 a year ago.
 11 CHAIRMAN AIZENSTAT: Then I'm confused and
 12 I apologize.
 13 MR. COLLER: Maybe I can clarify it.
 14 Previously, there wasn't a time deadline for
 15 somebody to appeal your determination.
 16 MR. ADAMS: No.
 17 MR. COLLER: So they could, in theory, six
 18 months from your determination, make an appeal?
 19 MR. TORRE: Up to 18 months, because the
 20 letter then expires.
 21 CHAIRMAN AIZENSTAT: Unless the property
 22 was demolished.
 23 MR. COLLER: Well, I guess then there's
 24 nothing --
 25 CHAIRMAN AIZENSTAT: If the property is

1 for the hell of it --
 2 MR. ADAMS: Bear in mind, they can do that
 3 at the moment. There's nothing in the Code
 4 that prevents them from doing it.
 5 MR. WITHERS: They still have the appeal
 6 process.
 7 MR. BEHAR: But this just makes it easier
 8 for them to.
 9 MR. TORRE: Because of the transparency of
 10 the posting?
 11 MR. BEHAR: No, because now you're posting
 12 online.
 13 MR. TORRE: That's what I'm saying to you.
 14 It's the posting part.
 15 CHAIRMAN AIZENSTAT: No, the posting -- I
 16 don't mind the posting, but now you're changing
 17 that for ten days, that they can make that
 18 appeal. Am I incorrect in the way I understood
 19 it?
 20 MR. ADAMS: Ten days to submit the intent
 21 and then 21 days after that to submit a --
 22 CHAIRMAN AIZENSTAT: If it wasn't posted at
 23 all, they could still do that?
 24 MR. ADAMS: We do receive regular public --
 25 public records requests from people in the

1 demolished four months later --
 2 MR. COLLER: So this really cuts the
 3 appellate time off.
 4 MR. ADAMS: Yes.
 5 MR. BEHAR: So they only have ten days to
 6 appeal your decision?
 7 MR. WITHERS: To notify of the appeal.
 8 MR. ADAMS: Ten days to submit the letter
 9 of intent, an intent to appeal, and then they
 10 have 21 days after that letter to submit the
 11 appeal.
 12 CHAIRMAN AIZENSTAT: Okay. Because I
 13 understood it differently.
 14 MR. BEHAR: I did, too.
 15 MR. TORRE: It's more stringent. The only
 16 issue is, there's an openness to all of this.
 17 CHAIRMAN AIZENSTAT: Right. I have no
 18 issue with the posting.
 19 MR. ADAMS: No.
 20 CHAIRMAN AIZENSTAT: My issue was, I
 21 thought you were adding now, you know, that
 22 they have ten days, which wasn't before.
 23 MR. ADAMS: No.
 24 MR. BEHAR: Before, it's unlimited, 18
 25 months?

1 MR. ADAMS: Yeah.
 2 MR. BEHAR: So we're cutting it down to ten
 3 days to submit a letter of intent and 21 days
 4 to appeal?
 5 MR. ADAMS: To submit a full designation
 6 application.
 7 MR. BEHAR: Would you -- can they present
 8 it the same way?
 9 MR. COLLER: Any motion is in order at this
 10 point.
 11 CHAIRMAN AIZENSTAT: If you would --
 12 MR. COLLER: You can make the same motion
 13 again.
 14 MR. WITHERS: I would like to make a motion
 15 to vote in favor of this, please. I move the
 16 motion. I rewound and I repeated it, okay.
 17 MR. TORRE: I will rewind and second it.
 18 CHAIRMAN AIZENSTAT: Thank you.
 19 Call the roll again, please.
 20 THE SECRETARY: Chip Withers?
 21 MR. WITHERS: Yes.
 22 THE SECRETARY: Venny Torre?
 23 MR. TORRE: Yes.
 24 THE SECRETARY: Robert Behar?
 25 MR. BEHAR: Yes.

1 there's anybody in the audience.
 2 CHAIRMAN AIZENSTAT: Would you like to make
 3 your presentation?
 4 MS. GARCIA: Well, it's not a presentation.
 5 I think you already know what the text
 6 amendment does. So, currently, the TDRs, they
 7 expire in two years. So this is removing that
 8 two-year expiration for the certificate, but
 9 keeping the two-year expiration for the
 10 receiving site.
 11 MR. WITHERS: Say that again. I'm sorry.
 12 MS. GARCIA: So, right now, TDRs, the
 13 certificate of transfer, that historic property
 14 gets when they have square feet that are unused
 15 development rights, to transfer them, that
 16 expires right now after two years, and I think
 17 it's renewed --
 18 MR. WITHERS: Is that, once they have been
 19 designated, is that what you're saying?
 20 MS. GARCIA: After they've been designated,
 21 yes --
 22 MR. WITHERS: Okay.
 23 MS. GARCIA: -- they're allowed to transfer
 24 those development rights that are unused.
 25 MR. WITHERS: Because the transfer of

1 THE SECRETARY; Eibi Aizenstat?
 2 CHAIRMAN AIZENSTAT: Yes. Now I have a
 3 clear understanding of it.
 4 MR. TORRE: Craig, that's two for two
 5 today. You're two for two today.
 6 MR. COLLER: I'm on a roll.
 7 MR. TORRE: You're good.
 8 MR. BEHAR: Thank you for the
 9 clarification.
 10 CHAIRMAN AIZENSTAT: Let's go on to G-4,
 11 please.
 12 MR. COLLER: Item G-4, an Ordinance of the
 13 City Commission providing for a text amendment
 14 to the City of Coral Gables official Zoning
 15 Code by amending Article 14, "Process," Section
 16 14-204.9, "Expiration of Approvals; to
 17 eliminate the expiration of Certificates of
 18 TDR; providing for severability clause,
 19 repeater provision, codification, and providing
 20 for an effective date.
 21 Item G-4, public hearing.
 22 MR. BEHAR: I'll make a motion to approve.
 23 I'll take that back. Strike that.
 24 MR. COLLER: You could do that. You don't
 25 have to have -- but we do need to see if

1 development rights never expire.
 2 MS. GARCIA: That's the thought, but,
 3 however, the Zoning Code does expire them.
 4 MR. WITHERS: That's what I'm saying,
 5 before they've been transferred and designated
 6 or just now? I mean --
 7 MS. GARCIA: No, before they're actually
 8 being utilized and put into a receiving site.
 9 MR. WITHERS: So let's talk about one of my
 10 favorite topics, the Coral Gables Museum.
 11 MS. GARCIA: Okay.
 12 MR. WITHERS: Okay. They have transfer of
 13 developments rights and I thought they've had
 14 them for many, many years. We just, a couple
 15 of weeks -- a couple of meetings ago changed
 16 the Code to reflect that. So are you saying
 17 that those transfer of development rights
 18 available expire or they only expire after
 19 they're already been designated --
 20 MS. GARCIA: The certificate itself
 21 expires. The unused development rights are
 22 always there until they're actually received
 23 and built by a property.
 24 CHAIRMAN AIZENSTAT: So that means you'd
 25 have to pay the fees to get the certificate