City of Scottsdale

COMMERCIAL

DESIGN GUIDELINES

Adopted Version December 7, 2000

PURPOSE

Scottsdale has many desirable aesthetic qualities and areas with unique character. These attributes have been closely guarded and nurtured by programs and initiatives intended to protect the community's aesthetic qualities and ensure design excellence. Despite this tradition, increasing development pressure for standardized and corporate driven design solutions threaten the very essence of what makes Scottsdale a desirable and unique place.

These guidelines are intended to promote good design that is responsive to its contextual setting. The guidelines outline the City's expectations with regard to the design of commercial retail establishments and are intended to assist residents, applicants, decision-makers, and staff in the consistent development, review, and consideration of commercial retail proposals.

The guidelines are applicable to commercial development (retail and service). Commercial development includes, but is not limited too, large and medium size "box" stores, inline (strip) multiple tenant retail, multiple tenant shopping centers that incorporate inline shops and larger anchor tenant spaces, commercial pad sites associated with a larger center and freestanding commercial buildings. Separate guidelines apply to convenience store retail and restaurants. The guidelines are to be applied throughout the community and are intended to respond to the varying conditions and constraints inherent to individual site and contextual settings. Where these guidelines conflict with other guidelines established for a specific geographic area, the guidelines associated with the geographic area shall apply.

KEY OBJECTIVES

- Support the Intent of the Scottsdale Sensitive Design Principles.
- Protect and enhance the character and quality of commercial areas while maintaining and strengthening a recognizable identity and character that is unique to Scottsdale.
- Enhance the human scale of commercial developments and respect the scale and character of residential neighborhoods that adjoining commercial uses.

- Mitigate the negative visual impacts arising from the scale, bulk and mass inherent to large commercial buildings and centers.
- Strengthen the pedestrian environment and improve access to transit.
- Allow for needed flexibility to respond to conditions and constraints inherent to specific sites and specific areas within the community.
- Provide flexibility to respond to the unique characteristics and constraints inherent to commercial development and too evolving commercial development configurations.
- Promote building designs and practices that are adaptable to multiple uses for extended building lifecycles.
- Minimize negative impacts from on-site activities to adjacent uses.
- Balance the economic requirements of the development with aesthetic concerns of the community.

CHARACTER/ CONTEXT

A variety of character /contextual settings exist in Scottsdale, ranging from urban settings in the Downtown to suburban and rural neighborhood settings in outlying areas. Scottsdale places a high value on architectural approaches that recognize a project's contextual setting and the scale of development within a given area. The architecture and site design of a project should contribute to the established (or planned) design character of the community and/or neighborhood.

DESIGN GUIDELINES

The guidelines are intended for new construction and renovation proposals considered by the Development Review Board or through staff approvals. Development proposals will be reviewed with respect to these guidelines in addition to other development regulations as they may apply. Design guidelines cannot predict the unique potential and/or constraints for each project. Thus, the following guidelines are intended to establish a general direction and a base level of development quality and compatibility with surrounding areas. The guidelines are organized into five (5) sections including Site Design, Architecture, Landscape Design, Lighting, and Signage / Identification.

Site Design

The site design of commercial development is one of the most critical aspects of a successful project. Decisions made at the conceptual design stage have repercussions throughout the design development process. This section begins with a listing of some of the more common components of commercial site development. The list of components is followed by key site characteristics and contextual influences that may impact the arrangement and relationship of the components within the site. Lastly, this

section sets forth specific guidelines that address the planning of sites with relationship to site characteristics and contextual influences.

Site Components

The main components of commercial site design that should be considered throughout the design development process include:

- Buildings, walls, and other architectural features
- Service, loading, refuse collection areas and storage areas
- Utility infrastructure and wireless communications infrastructure
- Required open spaces (NAOS and other), special user amenities (i.e. pedestrian plazas, enhanced pedestrian zones) and other special features (i.e. focal architectural elements, landscape features and public art).
- Parking lots, parking structures, parking canopies and vehicular circulation/access
- Pedestrian circulation systems, transit facilities, and bicycle facilities
- Drive through facilities including associated equipment, signage and circulation
- Ancillary uses (i.e. - ATM's, retail kiosks, vending equipment and news racks)
- Open air display and sales (i.e.- garden shops, propane, and seasonal items such as firewood)
- Shopping cart storage and collection areas
- Outdoor dining areas (when food service is a component of a single or multiple-tenant center)
- Linkages and coordination of elements with surrounding uses

Site Characteristics and Contextual Influences

Development proposals will be reviewed with respect to their response to the physical characteristics of the site and to the contextual influences of the surrounding area. Both the physical site characteristics and contextual influences should be considered early and throughout design development.

Key site characteristics include but are not limited too:

- Environmental – i.e. existing vegetation, topographic features, minimally undisturbed natural areas, and drainage
- Visual – i.e. view sheds, view corridors and prominent views from on-site and off-site
- Climatic - i.e. sun angles and solar exposure

Key contextual influences include but are not limited too::

- Public infrastructure (i.e. streets, transit facilities, pedestrian and/or multi use paths and under and above ground utilities)
- The patterns, character and scale of existing and planned development in the immediate area
- The sensitivity and nature of adjoining land uses
- Potential connections and other relationships with adjoining development – i.e. pedestrian access points, shared driveways, off street vehicular connections, open space systems and landscape buffers and service corridors
- Archeological/cultural resources (see Preservation Ordinance)
- Other features of the site and/or surrounding area that may be impacted by or may impact the proposed development

1. Site design should respond to the topography, vegetation/landscape features and drainage characteristics of the site.

- Site grading should emulate the natural characteristics of the site's underlying topography. Finished floor elevations of buildings and parking areas should transition with the grades of the site.
- Site designs should incorporate and retain features of the natural environment such as drainage ways, associated vegetation masses and mature specimen trees.
- Site buildings to take advantage of the natural topography of the site and the opportunities the topography offers to reduce the apparent mass and bulk of large structures.
- Significant site features, such as rock outcroppings, washes and prominent views enjoyed by key locations within the public realm should influence site design.

2. Site designs should respond to local contextual influences and to the site designs of adjoining developments. Elements that could be coordinated between adjacent sites include:

- Shared driveways for accessing perimeter streets
- Linkages of internal vehicular circulation systems
- Linkages of interior pedestrian systems with the systems of adjoining sites
- Linkages/continuation of open space systems
- Perimeter open space and landscape buffers zones
- Areas and access for service and refuse collection
- Drainage and retention facilities
- Linkages of other networks systems and functional areas where a coordinated site design approach will benefit the cohesiveness of the larger area

Development Patterns and Relationship to the Public Realm

3.   Proposals should follow local development patterns (i.e. geometry of street system, open space and view corridors, common setbacks, streetscapes). The continuation of such patterns should contribute to a unified visual appearance within an area.

4.   Not all established development patterns present opportunities for a desirable interface. Applicants should be prepared to address such situations with respect to the current design proposal and how the departure from the existing pattern benefits the community.

5.   Building entries should be easily identifiable and should acknowledge the importance of the need for visibility from the public realm.

6.   Unless constrained otherwise buildings should have a strong visual and pedestrian relationship to the street and should be clustered around and connected to public space.

7.   Where buildings are required to be set back far from the street (i.e. sites with street-side NAOS buffer or scenic corridor setback requirements), a strong pedestrian connection should be provided to the street edge to promote connectivity to transit and existing or planned area wide pedestrian pathway network. stops).

Parking Facilities

8.   Commercial developments are encouraged not to exceed parking requirements imposed by the City and seek opportunities and incorporate features intended too reduce the dependence on the automobile (i.e. enhanced accessibility to transit and pedestrian connectivity).

9.   Surface parking areas and other expansive areas of paved surfaces should be broken up with landscape planting. Ideally, in larger commercial developments, surface parking should be planned in sub-areas accommodating 250 to 300 vehicles. Each parking sub-area should be separated by a 15 to 20-foot wide landscape planting area or a more significant landscape/building area.

10.   In areas where the natural desert is the predominant context, staggering parking landscape islands and introducing curvatures to parking aisles should be incorporated to further break the rigid geometry of parking areas.

11. Where parking structures have a strong relationship to the street or other pedestrian areas, the lower level of the structure should be activated with pedestrian related improvements, storefronts or alternate uses and enhanced landscape treatments to soften the structure. Other sides of parking structures should also be landscaped with increasing intensity the more visible the parking structure is from surrounding uses.

12. Top deck lighting of parking structure should strive to eliminate glare and visibility of pole mounted fixtures by employing full cut-off fixtures and maintaining minimizing pole heights.

13. Consider parking structures with full roofs, varied parapet heights or other suggestive roof form variations to eliminate top deck lighting concerns and to create a more finished appearance. This may not be appropriate in all contexts.

14. Where parking areas occur adjacent to outdoor activity areas, a landscape buffer should be provided to reduce the impact of the parking area.

15. Consider providing electric refueling stations in parking areas.

16. Redundant circulation areas should be avoided.

Pedestrian, Transit and Bicycle Facilities

17. Clearly visible and direct pedestrian paths should be established between neighboring buildings, between buildings and outlying parking areas and between buildings and transit facilities (see Landscape Section).

18. Where pedestrian circulation paths cross vehicular routes, a change in paving materials, textures or colors should be provided to emphasize the conflict point, improve visibility, enhance safety and provide added aesthetic appeal.

19. Bicycle parking should be provided at locations that do not obstruct the flow of pedestrians, are easily identifiable and visible and convenient to customer entrances.

On-site Amenities and Special Features

20. Commercial centers should feature a pedestrian space(s) scaled with respect to the size and demands of the particular use. The space(s) should incorporate landscaping, shaded areas and seating opportunities for customers and employees.

21. When defining the best area(s) for pedestrian enhancements, internal locations, edge locations and corner locations should all be considered. The best area(s) for enhanced pedestrian space(s) should be the area(s) that provides the

greatest benefit to the most users and improve functional relationships and linkages internally and/or to adjoining areas.

22.   Outdoor dining areas are encouraged and when part of the development program, should be used to activate plazas, the edges of open space, building frontages and street frontages. Outdoor dining areas should be oriented away from off-site uses that are sensitive to noise or night-time activity.

23.   The placement of patios, plazas and similar spaces (including outdoor dining areas) should take into consideration the impact of solar orientation. Spaces having a southern or western orientation should incorporate landscape and architectural shading. If a site exists such that natural landscaping can not possibly be incorporated,, only then may shading occur singularly as architectural shading.

24.   When programming enhanced pedestrian areas consider the following features and elements:

*   Protection and relief from the vehicular environment
*   Structured and/or informal seating or waiting opportunities
*   Flexibility for special events, vendors and/or promotions
*   Active edges and adjoining dining areas
*   Lighting and power
*   Street furnishings (trash, information kiosk)
*   A focal element (water feature, sculpture, landscape, architectural feature or natural site feature))
*   Landscaping and decorative hardscape areas
*   Shaded and sunny areas
*   Public art
*   Featured views outward

Service, Refuse Collection and Utilities

25.   Service areas, storage areas and refuse enclosures should be oriented away from public view and screened from public areas. In larger commercial developments, trash collection, service and loading areas should be separated from main circulation and parking areas.

26.   In highly developed settings (i.e. downtown) or when a proposed refuse area adjoins a residential property, commercial uses that dispose of wet organic refuse should utilize odor controlling trash compactors.

27.   Service and refuse areas of nearby buildings should be clustered together when possible.

28.   Shopping carts should be stored within the building or in a screened with a wall that is integral to the architectural design of the adjoining building.

29.   Identify the location of above ground utility facilities early in the design process. When possible locate utility facilities where they do not conflict with featured views, outdoor dining areas and/or site circulation. Facilities should be accessible for maintenance and service requirements.

30.   Utility cabinets and pedestals should not be located within parking lot landscape islands or public right of way where they cannot be screened, are exposed to damage from vehicles and/or present a visual hazard to drivers or pedestrians. Utility cabinets, pedestals and other above ground utility infrastructure should be clustered and screened to the extent allowable by operation requirements and should be painted or integrally colored a tone that is neutral to its setting (see ROW Ordinance.) Consideration should also be given to accessibility of such facilities for required service and maintenance.

31.   Consider any potential need for wireless communication facility sites early in the design process. Current proposed facilities and future facilities should be fully screened and integrally designed with the site (see Wireless Communication Facilities Ordinance and Guidelines).

Drive-through Facilities

32.   Drive-through windows, menu boards, equipment, and associated stacking lanes should be located to minimize impacts on adjacent residential areas and should be adequately screened from public view and the view of adjacent sites.

33.   Circulation should allow for adequate length of stacking for drive through facilities that do not interfere with the movement of traffic (on or off-site) and/or pedestrian areas.

34.   Consider drive-through windows that incorporate an architectural covering consistent with the design theme of the building. Coverings over drive-throughs can help to achieve more variation to building mass and added comfort for users breakdown of building mass and finished building appearance.

Open Air Display and Sales

35.   Outdoor display and sales (i.e. propane sales, firewood displays, news racks, vending machines and amusements) are prohibited in most zoning districts. When such uses occur, display areas should be well organized, within a designated zone and not prominent from off-site views.

ATM's, Sales Kiosks and Other Ancillary Uses

36.   Walk-up ATM's, vending machines and similar uses should be integrated into existing or planned buildings. Freestanding sales kiosks are discouraged.

Architecture

The intent of the architectural guidelines is to ensure a base level of quality architecture that is responsive to its context and builds upon the aesthetic identity of the community rather than a design solution(s) that is based on a standardized formula or market prototype superimposed on the selected site. Over time, certain projects and landmark buildings begin to define the dominant character of an area. Not all buildings in the surrounding area contribute equally to the area character and each example should be weighed against the balance of all other projects. The intent of the architectural guidelines is to encourage proposals that will fit within and contribute to the established or planned architectural character and context of a specific area. Areas with little, no or poor immediate context should expand the area of influence to identify the architectural context or establish a new design vocabulary consistent with the Scottsdale Sensitive Design Principles.

Character and Context

1.   Building design should take into consideration the unique qualities and the dominant character of the surrounding area.

2.   Buildings that derive their image primarily from applied treatments that express corporate identity are discouraged.

3.   Buildings that are stylized in an attempt to use the building, or portion of the building to identify a particular user is generally discouraged, particularly where the proposed architectural design is the result of a corporate or franchise prototype design.

4.   The design of a building that occupies a pad or portion of a building within a planned project or shopping center should share similar design characteristics and design vocabulary. Precise replication is not desirable, instead utilizing similar colors, materials and textures as well as repeating patterns, rhythms and proportions found within the architecture of other buildings in the center can be utilized to achieve unity.

Scale and Proportion of Development

3.   New development should respect the predominant scale of development in the surrounding area by designing with elements of a similar scale and providing a gradual transition to any larger scaled masses proposed.

4.   Taller buildings or portions of a building should be located internally to a site with buildings stepping down in height as they reach the edges of site that are adjoined by smaller scaled development.

Massing

5.   The design of a building should reduce its perceived height by dividing the building mass into smaller scale components. One way to achieve this breakdown is to provide a well-defined base, middle and top to the building.

- A solid building base may be achieved by elements such as low planters and walls, base planting, a base architectural veneer banding (wainscot) and treatments defined by a different material, texture or color.
- A solid building base (and a more articulated building mass) may be achieved by the addition of covered walkways, trellises or architectural awnings that provide deep shadow at ground level.
- Using features such as distinct and multiple architectural roof forms, clearly pronounced eaves, and distinct parapet designs and cornice treatments may achieve a well-defined building top.

Other approaches and methods of establishing building definition exist and will be considered if the resulting design achieves a sense scale and character consistent with surrounding context.

6.   The design of a building should reduce its apparent bulk by dividing the building into smaller masses. Ideally, the distinction of each mass should relate to the Internal function of the building may indicate a logical hierarchy for breaking down the mass of the building.

The apparent mass of a building may be further reduced by the following techniques:

- Variations in roof form and parapet heights
- Incorporating clearly pronounced recesses and projections
- Introduction of wall plane off-sets (dimension established by building module)
- Use of other reveals and projections and subtle changes in texture and color of wall surfaces
- Use of deep set windows with mullions
- Use of ground level arcades and second floor galleries/balconies

- Use of protected and recessed entries
- Use of vertical accents or focal points

7. As a general rule, parapet heights should not exceed one-third the dimension of the adjacent grade to structural roof element measurement.

8. Buildings or portions of a building mass over 50 feet wide are encouraged to divide their elevations in to smaller parts. A pronounced change in massing, pronounced changes in wall planes and introducing significant variations in the cornice/roofline are all possible methods to accomplish the desired divisions of elevations into smaller parts.

9. Excessive use of decorative detail applied to the surface of a building is discouraged.

<u>Design of Pedestrian Frontages</u>

10. Building frontages and sides of buildings oriented to the street or other public areas i.e. parks, open space, trails or vista corridors) should incorporate a combination of arcades, pedestrian level display windows, storefronts, and store entrances

11. To activate a building frontage, entrances should be located at intervals of 50 feet and a maximum interval of 75 feet. Consider all of the following approaches (and others as they may apply) to further enhance the pedestrians experience and the visual appearance of building frontages.

- In large stores consider expressing internal functions (i.e. bank, deli, and florist) as a minor storefront.
- Incorporate two (or more) entrances along the front of all major users (i.e. grocers, discount and other department stores, warehouse stores).
- If two entrances are not possible, consider partially wrapping the front of a major user with smaller stores.
- If none of the conditions above are met, long storefronts should incorporate design features, which address the impacts to the pedestrian resulting from extensive inactive pedestrian frontage. Remedies may include specially enhanced pedestrian areas, generous landscaped areas, site walls and raised planters, variations in planes, materials and colors and other features or elements intended to address the comfort of the pedestrian. Long continuous wall planes should be avoided.

12. Buildings frontages should exhibit human scale detail, windows and other openings along ground floor pedestrian areas.

Renovations of Existing Centers

When renovations are considered to introduce new uses into existing retail formats the following should be considered.

13.   When a new use/addition is proposed to an existing commercial development the newly constructed portion of the building should appear as an originally conceived part of the design. The new additions should match the scale and reflect the proportions of the original structure where they adjoin or are adjacent. New construction of a different height and bulk, than that of the original structure, should not occur abruptly.

14.   New additions should match the existing approved architecture of the existing center. The extension of arcade elements, lighting, pathways and fenestration patterns, structural rhythms and use of materials should exhibit a seamless transition between the existing and new construction

Climatic Response

15.   Building elements that speak to the desert environment and climate, such as, architectural shade devices, a strong relationship to the ground plane, deeply recessed windows and the use of materials and textures that are associated with the region are encouraged to define the project identity with the context of the Arizona Sonoran Desert.

16.   Covered walkways and arcades are an important part of Scottsdale's architectural heritage. They are a response to climate, provide a sense of protection and can help articulate the mass and minimize the apparent bulk of a building. Covered walkways and arcades should be provided on all building frontages where pedestrian traffic is likely.

17.   Building should respond to solar heat gain, reflectivity and glare through building orientation and the use of architectural shading devices such as pronounced eaves, fin walls and/or covered walkways and low reflective material treatments.

18.   Where awnings are used they should be functional and provide maximum shade to the window area. Awnings should be of opaque architectural material and should not be internally lit. Metal awnings are preferred to fabric awnings for reasons of durability and strength of appearance. Awnings of a single color are preferred.

Architectural Details, Materials and Colors

19.   Primary entrances to buildings should be distinguished with façade variations, porticos, roof variations, recesses or projections, or other integral building forms.

20.   Building colors should emphasize muted earth tones. The use of highly reflective or glossy materials should be limited and are not appropriate in all contexts.

21.   Rich materials and a variety of materials is desirable on both the wall planes, roofs and ground plane. If stone or decorative block veneers are incorporated, the material should be used to highlight significant building features and massed elements.

22.   All sides of a building should express consistent architectural detail and character. All site walls and screen walls should be architecturally integrated with the building or as approved as part of an overall master plan area.

23.   Screening devices, site walls and enclosed service, loading and refuse areas should be designed to be an integral part of the building architecture.

Miscellaneous

24.   Drive through elements should be architecturally integrated into the building, rather than appearing to be applied or "stuck on" to the building.

25.   The following architectural treatments are generally discouraged:
- Gradation in paint color applied to one unbroken surface or the use of large graphics
- Extended bands of vibrant and/or highly contrasting corporate colors unrelated to the architecture.
- Long uninterrupted expanses of glass
- Extensive use of floor to ceiling glass storefronts (Floor to ceiling glass storefront treatments may be appropriate under arcaded areas and when used inc combination with other window treatments which allow for a solid building base).

Landscape Design

Landscaping should be integral to the overall design concept and should be carefully planned to serve more than one purpose. The intent of these guidelines is to ensure that landscape design contributes to the overall appearance and function of the site as well as the streetscape.

1. Landscaping should blend with the dominant existing or planned streetscape and character of the area.

2. Landscaping should be provided along and against all buildings to anchor it to the surrounding environment and to soften the structure. In-ground landscaping should comprise the majority of the landscaping requirement. Raised planters are acceptable when designed to accentuate the architecture and or enhance pedestrian areas.

3. Storefront areas should incorporate significant landscaping (including canopy trees). Frontage design and signage locations should be coordinated with the placement of plant material.

4. Trees should be used throughout paved areas and along pedestrian pathways to provide shade and too reduce heat build-up and glare. Landscape through and corridors adjoining parking areas should be a minimum of twenty feet in width when a parking module exceeds 250 cars.

5. A landscape buffer should be provided to screen commercial uses from residential areas.

6. Dense landscaping and/or architectural treatments should be provided to screen unattractive views and features such as storage areas, trash enclosures, utility cabinets and other similar elements.

7. The site design for projects located at street corners should provide special landscape treatment at street intersections to anchor the corner.

8. The use of mature trees is encouraged to provide an immediate impact especially when used in buffering adjacent uses.

9. Proper maintenance and timely replacement of plant material is expected and required by ordinance

10. Curbing should be installed at the edges of all planter areas adjacent to automobile circulation and parking areas.

11. Relief should be provided from direct and reflected sun by incorporating canopy trees and intermittent planting strips within parking areas. Plant material should be resilient to difficult growing conditions inherent to parking areas.

12. Primary pathways linking site features should be a minimum of six (6) feet wide and should incorporate landscape and/or architectural shading.

Lighting

Site lighting, security lighting and architectural/landscape lighting should provide the user with illumination levels appropriate for the designed activity (i.e. parking, walking, outdoor dining). Illumination levels should also be reasonably uniform throughout the site and strive to minimize glare.

General Lighting Standards

1. Avoid competing light levels and maintain balanced light levels on-site and between adjacent properties. The exterior lighting design must take into account the background lighting levels, lighting from other sources, and characteristics of the surrounding area.

2. Recommended light level guidelines and uniformity ratios established by the Illumination Engineering Society of North America (IESNA) in the IESNA *Lighting Handbook (current edition)* should be considered along with the predominant lighting characteristics of the surrounding area when determining appropriate solutions to lighting design.

3. Light glare or excess brightness should be minimized. Cut-off fixtures, mounting heights, and the elevation of potential viewers must all be considered for effectively controlling glare by directing light below the horizontal.

4. Light trespass beyond property lines should be controlled by shielding or aiming fixtures away from residential properties. Light trespass should not exceed ambient levels.

5. Security lighting and lighting of service areas should meet the standards listed above.

Architectural and Landscape Lighting

6. Architectural lighting should be used to highlight special features only. Lighting of expansive wall planes or the use of architectural lighting that results in hot spots on walls or roof planes should be avoided.

7. Landscape feature lighting and lighting at the pedestrian level is encouraged.

8. Lighting on the top deck of parking structures should be shielded to the extent feasible and be mounted to keep a low profile to the garage.

Signage /Corporate Identification

The architecture of the building should be viable and appropriate for its location and use regardless of the business identity. Commercial signage plans should reflect a balance between allowing adequate signage for business identification while protecting the visual aesthetic of Scottsdale's streetscapes. Other forms of branding or business identity not falling under the sign ordinance will be viewed as architectural elements and features and evaluated as such.

1. Business identity, either by awnings, accent bands, paint or other applied color schemes, signage, parapet details, decorative roof details or materials should not be the dominant architectural feature. Accent colors should be used judiciously.

2. All signage should be architecturally integrated with their surroundings in terms of size, shape, color, texture, and lighting so that they do not visually compete with the architecture of the building and design of the site. Signs should be integrated as such that they become a natural part of the building façade.

3. When multiple tenants share one site, signs should be integrated as one unit to create shared identity for the property to the extent permitted by the ordinance or be located and/or designed as a package where signs do not visually compete with each other.

4. New construction design should anticipate signage. Designs should provide logical sign areas, allowing flexibility for new users as the building is re-used over time.

5. Repetitious signage information on the same building frontage should be avoided.

6. Signs composed of individual letters are encouraged. Back lit or indirectly lit individual letters are generally desirable.

7. Visible raceways and transformers for individual letters are discouraged.