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RE: 3200 block California Ave. SW proposed rezone, DPD project #3007538

Malli:

The following comments are submitted by the Admiral Neighborhood Association, stewards of the Admiral Residential Urban Village Plan. Our Neighborhood Plan, approved and adopted by City Council in October, 1999, represents a vision for the future of the Admiral Neighborhood. The Plan was created over a period of two years with the input of dozens, possibly hundreds, of Admiral residents and business owners who represented a broad spectrum of neighborhood interests.

Any proposed changes to existing zoning in the area, new developments, or other proposed changes to the neighborhood are judged in how they support, or do not support, the adopted Neighborhood Plan. Proposed changes that impact the neighborhood in any way must also be judged in the benefit they bring to the community. No changes in the neighborhood come without some type of positive or negative impacts that must be considered.

Our understanding of the proposal is to change the zoning of a large area (150,000+ sq. ft.) on or around the 3200 block of California Ave. SW that lies mostly within the boundaries of the Admiral Residential Urban Village from the current zone of NC1-30 to NC2-40. The following changes would occur:

1. Maximum building height would increase from 30' to 40', noting additional height allowances for ground floor retail uses, roof pitch and elevator/mechanical structures and equipment.
2. Maximum permitted size of ground floor commercial uses would increase from 10,000 sq. ft. to 25,000 sq. ft. for most uses.
3. Certain additional ground floor commercial uses would be permitted.

There may be other changes, but this short list may be the most apparent. Please feel free to provide additional information regarding any potential changes.

As a neighborhood association, we seek to provide a balanced and informed approach to our assessment of proposed changes to our community. It serves no one well to make any rush to judgment until enough information can be learned.

After reviewing the current proposal, considering the Neighborhood Plan, and understanding the current and potential development potential of the Admiral Residential Urban Village, the Admiral Neighborhood Association cannot support the proposed rezone of the 3200 block of California Ave. SW.

**The following are three main reasons why the ANA cannot support the proposal:**

**1. The proposed rezone runs contrary to the Admiral Residential Urban Village Plan.**

The Neighborhood Plan states, in Recommendation 1.2 within the **Admiral Residential Urban Village Character Plan, Public Design Elements and Design Guidelines**:

**General Goals**

**Goal 1.1:** Improve the existing character of the Admiral Residential Urban Village as identified by the following Admiral Residential Urban Village Character Plan.

**Recommendation 1.2:** The Planning Coalition recommends that existing zoning should remain with no changes within the Admiral Residential Urban Village because of the Coalition's strong desire to maintain the existing character of the community.

The Neighborhood Plan clearly states that the current zoning should remain as-is. But, to avoid any assumption that the Neighborhood would resist any changes to zoning to simply avoid change, the Plan goes on to state:

**Recommendation 1.4:** The City [and any stakeholders] and the Admiral community should work together to develop a process where the community can provide enhanced and meaningful input into any height increasing exceptions including that for sloped roofs.

It is unfortunate that the ANA and the Admiral community had to find out about the proposal through the DPD Land Use Notice. When changes to the community are conceived by anyone, it is clearly stated in the Plan that the community is willing to work together with any stakeholders to consider proposed changes through a process involving "meaningful input". We would simply like to be at the table much earlier in the process.

**2. The Admiral Residential Urban Village, as currently zoned, provides more than adequate development potential within the existing NC2-40 zone to fulfill the projected need for housing and associated retail and commercial development as stated in the Comprehensive Plan for 2024.**

The City of Seattle Comprehensive Plan, in Appendix UV-A4, lists the quantity of additional households to be added to the Admiral Residential Urban Village area by 2024 at 200. Even considering potentially more rapid growth of the area than called for in the Comp. Plan would be within reason, so a quantity as high as 250 or 300 may be possible.

That said, in the 98 acres of the Admiral Residential Urban Village, there exists in excess of 400,000 sq. ft. of undeveloped or underdeveloped property currently zoned NC2-40. For the sake of this comment, let's assume that an NC2-40 zoned, 10,000 sq. ft. parcel with ground floor retail and three levels of residential units could contain approximately 20 (or more) housing units. **With over 400,000 sq. ft. of NC2-40 zoned land already in the Admiral Residential Urban Village, future development could yield in excess of 700 housing units and hundreds of thousands of square feet of commercial space.**

Additionally, the proposed rezone would decentralize development from the immediate core of the Residential Urban Village, pulling both retail and residential uses away from the area best served by transit and other City services. With the current, pressing need to

create an even stronger retail core at the intersection of California Ave. SW and SW Admiral Way, this proposal can't be supported.

- 3. Lastly, the proposed rezone presents no plan, design or other compelling potential development scenario that would warrant consideration by the Admiral community. Furthermore, there is no clearly defined public benefit from the proposal.**

Most, if not all, recent proposed zoning changes come with a host of well-conceived urban design and architectural concepts that present a clear vision for the future. Current upzone proposals in South Lake Union, SODO, the ID, and other areas have all been through extensive public processes and have very clear stated intentions. Most bring with them real, substantial public benefits, including enhancements to transit, public spaces, contributions to affordable housing funds, dozens of units set aside for workforce housing, opportunities for shared parking, and other benefits.

The proposers have not presented any conceptual ideas of what this rezone would yield. The ANA does not disregard the proposers long-time relationship with the West Seattle community, nor do we doubt their ability to create positive change in the community. **There just isn't any actual, real plan.**

Additional considerations should be paid to the existing tenants in the rezone area who already represent a group of tenants in "affordable" housing. Any changes to the housing there would surely cause rents to increase and would displace any and all of the current tenants unable to afford a higher cost of living. The neighborhood would suffer a net loss of affordable housing without any guarantees for replacement.

Please note the last two attached pages from the City of Seattle Municipal Code regarding the function and locational criteria for NC1 and NC2 zones. **The NC1 zone in the proposed rezone area MEETS the criteria for NC1 in the following ways:**

1. The retail opportunities there support the surrounding residential areas but do not contribute to the larger Admiral Business District due to the distance between the two retail areas. Physical separations, including Hiawatha Park and the West Seattle High School on the east side of California and the Seattle Housing Authority's senior housing facility (with no ground-related commercial space) on the west side of California create a break in any continuity required for a successful retail district.
2. Retail stores in the proposed rezone area are well suited to pedestrian traffic but do not support drive-to business well. There is little off-street, shared parking like there is closer to the core of the Admiral Business District.
3. The proposed rezone is within the urban village, but is peripheral and isolated (as noted previously) to the main business district and is adjacent to low-density residential areas, per Locational Criteria B1 below.
4. Lastly, there are few, if any, physical edges, per Locational Criteria B3, to buffer the surrounding areas. The eastern part of the rezone lacks an alley between the commercial area and the adjacent SF5000 lots.

**In reviewing the functional and locational criteria for NC2 zones, the proposed rezone area DOES NOT MEET the criteria for NC2 in the following ways:**

1. The current core of the Admiral Business District in the NC2-40 zone serves the surrounding population with a wide variety of stores. There exists more than adequate capacity for expansion of the amount of retail in this area over the next 20+ years.
2. The main shopping area serves pedestrian and drive-to retail traffic and does so well, as it is at the intersection of the Admiral Neighborhood's two major arterials, California and Admiral. The proposed rezone area does not serve both modes of traffic as well.
3. Noting Locational Criteria B1, the proposed rezone area is not, and will never be, the primary retail district within the Admiral Residential Urban Village.

The ANA anticipates a bright future for our Admiral Neighborhood that will inevitably include new developments and other changes. Unfortunately, this proposal does not support that shared vision. The Admiral Neighborhood Association cannot support this proposal and asks you, Malli Anderson, the City of Seattle's Hearing Examiner, and the City Council to **recommend against approval of this proposal.**

Sincerely,  
The Admiral Neighborhood Association

Mark Wainwright  
President

Katy Walum  
Vice President

Beth Wright  
Treasurer

Dave Weitzel  
Secretary

Attachments: NC1 and NC2 Function and Locational Criteria from Seattle Municipal Code

**From the City of Seattle Municipal Code:**

SMC 23.34.074 Neighborhood Commercial 1 (NC1) zones, function and locational criteria.

- A. Function. To support or encourage a small shopping area that provides primarily convenience retail sales and services to the adjoining residential neighborhood, where the following characteristics can be achieved:
  - 1. A variety of small neighborhood-serving businesses
  - 2. Continuous storefronts built to the front lot line;
  - 3. An atmosphere attractive to pedestrians;
  - 4. Shoppers walk from store to store.
  
- B. Locational Criteria. A Neighborhood Commercial 1 zone designation is most appropriate on land that is generally characterized by the following conditions:
  - 1. Outside of urban centers and urban villages, or within urban centers or urban villages where isolated or peripheral to the primary business district and adjacent to low-density residential areas;
  - 2. Located on streets with limited capacity, such as collector arterials;
  - 3. No physical edges to buffer the residential areas;
  - 4. Small parcel sizes;
  - 5. Limited transit service.

SMC 23.34.076 Neighborhood Commercial 2 (NC2) zones, function and locational criteria.

- A. Function. To support or encourage a pedestrian-oriented shopping area that provides a full range of household and personal goods and services, including convenience and specialty goods, to the surrounding neighborhoods, and that accommodates other uses that are compatible with the retail character of the area such as housing or offices, where the following characteristics can be achieved:
  - 1. A variety of small to medium-sized neighborhood-serving businesses;
  - 2. Continuous storefronts built to the front lot line;
  - 3. An atmosphere attractive to pedestrians;
  - 4. Shoppers can drive to the area, but walk from store to store.
  
- B. Locational Criteria. A Neighborhood Commercial 2 zone designation is most appropriate on land that is generally characterized by the following conditions:
  - 1. Primary business districts in residential urban villages, secondary business districts in urban centers or hub urban villages, or business districts, outside of urban villages, that extend for more than approximately two blocks;
  - 2. Located on streets with good capacity, such as principal and minor arterials, but generally not on major transportation corridors;
  - 3. Lack of strong edges to buffer the residential areas;
  - 4. A mix of small and medium sized parcels;
  - 5. Limited or moderate transit service