



## POSITION ON DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS) FOR MHA IMPLEMENTATION

### Overall MHA/HALA Position Statement

The Junction Neighborhood Association (JuNO) supports land-use policies that provide for affordable housing, fair growth and density allocation, suitable infrastructure and open space, and enough transit to serve our growing community. We are sensitive to our existing neighborhoods and insist on balancing growth with livability.

Unfortunately, the City of Seattle has proposed zoning changes to the West Seattle Junction that violate these common-sense principles and the letter and spirit of our neighborhood plan – all at a time when we should be focused on comprehensive planning process that includes Light Rail.

The City's Mandatory Housing Affordability (MHA) proposal under the Housing Affordability & Livability Agenda (HALA):

- Fails in its mission to create appreciable affordable housing in our area
- Increases density without improving already-strained parks, schools, and transit
- Destroys single-family neighborhoods, in conflict with our official Neighborhood Plan <sup>1</sup>
- Allows for buildings that are out of scale with their streets
- Is unnecessary, as the Junction already has enough capacity for new density <sup>2</sup>

We don't want to ban development in our own back yard. But we do demand planning be done the right way – as it has been the case in other parts of the City – especially given the eventual arrival of Light Rail. Such an effort must be guided by these principles:

- A neighborhood planning effort to describe a "Junction 2035" vision that simultaneously plans for growth, affordable housing, livability, and the preservation of the small-town character that makes West Seattle an attractive place to work and live
- A pause on MHA/HALA development efforts until such a plan is in place
- A redrawing of the Junction Urban Village boundaries to protect the character and integrity of single-family areas as stipulated in our official neighborhood plan

### Overview & Position Statement

The City's DEIS includes two upzoning options – Alternative 2 and Alternative 3 – and analyzes their impacts on the Junction. Neither is acceptable as they use analyses that are so superficial it is impossible understand the actual impact of development in our neighborhood, or are so deeply flawed they understate those impacts; do not propose, or simply fail to recognize, the mitigation necessary to offset the impacts of the proposed development; and do not reflect community input.

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<sup>1</sup> Seattle 2035 Comprehensive Plan, Nov 2016.

<sup>2</sup> Housing at Junction has grown by 111% since 1995, the highest of any urban village in the city. Given no zoning changes, the Junction will still grow by a further 59% by 2035, the second highest growth rate of any urban village in the city (DEIS Exhibit 2-7).

## Key Findings

The City closed its comment period for MHA upzoning on September 9, 2016 – roughly a month before it quietly released draft neighborhood maps. Property owners and residents directly affected by the MHA changes were not individually notified prior to this date. While the City has scrambled to correct its error, it's likely the DEIS does not reflect the most-affected members of the community, and is certainly flawed as it relates to the key findings below.

- **Overall Analysis: Superficial.** The biggest flaw in the DEIS is that it analyzes rezoning on a citywide level. In other words, it proposes to upzone the Junction *without* making a street-level assessment of things such as traffic, parking, and infrastructure. It begs the question: why propose zoning changes when you don't know what they'll look like?
- **Affordable Housing: Failure To Deliver.** The DEIS projects the Junction to gain only 20 to 36 new units of affordable housing over the next 20 years – in exchange for upzoning more than 20 blocks. All other units will be priced at market rates. The result will be a further erosion of the neighborhood's economic diversity.
- **Community Feedback: Mischaracterized, Disregarded.** The City's outreach has been so flawed we have documented it separately. In a nutshell, while the HALA team says it provided ample opportunity for neighborhood feedback to shape its ultimate proposal, data in the City's possession indicate the team mischaracterized and/or disregarded Junction voices. The analysis is posted on <https://www.facebook.com/wsuno.org/>.
- **Neighborhood Plan: Unilaterally Undone.** On Page 152 of the DEIS is an admission that some upzoning efforts will conflict with existing neighborhood plans – and says the City should simply change those plans to remove such conflicts. We expect the City will try to unilaterally remove the longstanding protection for the character and integrity of single-family homes inside the Junction Urban Village from our neighborhood plan.
- **Traffic: Analysis Exceptionally Flawed.** The DEIS states the RapidRide C Line operates at 67% capacity at peak hours, when local riders know the C Line is overcrowded and skips stops at the Junction when full during peak AM trips.<sup>3</sup> Further, the DEIS calculates travel time in and out of West Seattle using Google Maps data for a single evening in March, when local drivers know the worst commute times are in the mornings and more variable than a single Spring evening would suggest. The DEIS does not offer any mitigation for the impact of upzoning on traffic on either West Seattle or the Junction: it simply says it needs further study.
- **Parks: Not Enough, None Coming.** According to the DEIS, Parks accessibility at the Junction is worse than the City's open-space standard, and the Junction has among the lowest amounts of nearby park space per resident in the City. While the City acknowledges more growth will create a greater strain on parks and recreation resources, it proposes no specific mitigation.

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<sup>3</sup> DEIS Exhibit 3.4-26

## Key Findings Cont'd

- **Housing Look & Feel: Profound Shift.** The DEIS presumes multifamily buildings in newly upzoned single-family areas will have a modern and geometrical design. It also states those designs will not have a significant impact on the *aesthetics* – or look and feel – of upzoned areas. In fact, a large percentage of the homes in these areas are more than 90 years old; new construction is rare, with only a small percentage built in a modern, geometrical design; and it is more common for new homes to emulate the Craftsman style of existing homes. There will be a profound shift in aesthetics on these blocks.

In perhaps its most head-scratching statement, the DEIS says neighborhood planning and design review should be used to mitigate aesthetic shifts. We agree. However, the City has told JUNO there is no funding available for such planning – and, under a separate initiative, the City proposing that design review be eliminated for most developments. Thus the City has simultaneously minimized the impact of its upzoning and eliminated access to its proposed solution.

- **Historic Buildings: Not Considered.** The DEIS fails to acknowledge the Junction's historic Hamm and Campbell buildings or the results of a 2016 survey of historic properties along California Ave SW and the streets immediately east and west of it. These buildings are the physical embodiment of the Junction's small-town feel and connected deeply to neighborhood events ranging from the Farmers Market to the West Seattle Grand Parade. The City proposes to allow building heights up to 95 feet along California Ave SW with no regard for historic buildings or neighborhood uses that contribute to the livability in the area.
- **Public Safety: Key Issues Ignored.** Despite not having its own hospital, and despite a projected growing population, the DEIS fails to examine access to emergency services for Junction residents during a disaster. It also fails to study or acknowledge and mitigate the impact on police requirements for the SW precinct, the need for those officers to meet a 7-minute response time standard, or the impacts of rezoning on property crime and auto theft.
- **Wastewater Systems: Undersized, Improperly Measured.** The DEIS fails to acknowledge that most sewer lines in the Junction are less than 12 inches wide and must be upgraded to meet the demands of either alternative. No mitigation is proposed. The sewer analysis is itself faulty, as it fails to study peak flows; given the age of the sewer system and its use as a storm water system, peak flows are critical.
- **Schools: Overcapacity Not Considered** The DEIS fails to flag the lack of school capacity for Junction residents. It proposes no material mitigation for this capacity issue. What's more, it fails to acknowledge that the School District's BEX Phase IV plan will still leave the Junction 1,100 seats shy of student demand.

## WHAT OUR NEIGHBORHOOD NEEDS

- **A Comprehensive Planning Effort.** We have spent the last nine months trying to alert the City where it's erring; we would rather spend our time helping to set things right. We need a comprehensive plan, one that integrates the work of Sound Transit, Seattle Public Utilities, Seattle Public Schools, and the City of Seattle's planning, housing, fire, police, emergency management, and parks and recreation departments. The sooner we get started, the better.
- **Our Own EIS.** As the entry/exit transportation point for much of the West Seattle peninsula toward Downtown, the Junction likely to feel impacts from upzoning at the block-and-street level more acutely. The Junction or – at the very least, the West Seattle peninsula – deserves its own environmental impact statement prior to the implementation of the MHA upzones.
- **A Respected Neighborhood Plan.** Our neighborhood worked hard to craft an urban village agreement with the City. That plan, and its protection of the character and integrity of single-family homes in the Junction Urban Village, is part of the official Seattle 2035 comprehensive plan. Those protections should remain in place.

## WHAT YOU CAN DO

- **In Person.** When candidates for Mayor and City Council come to your door, have your questions ready and make your feelings known.
- **Online.** The deadline for comment on the DEIS is August 7, 2017. The best comments to submit are those related to a flawed/absent process, analysis, or mitigation. You can submit them via a form at <http://bit.ly/2v59P3C>. Your input is vital.
- **Via Email.** Send your comment about the DEIS to the HALA team at [MHA.EIS@seattle.gov](mailto:MHA.EIS@seattle.gov). You can also copy Mayor Ed Murray ([ed.murray@seattle.gov](mailto:ed.murray@seattle.gov)) and the Seattle City Council ([council@seattle.gov](mailto:council@seattle.gov)).
- **Via Social Media.** Stay informed via our Facebook site: <https://www.facebook.com/wsuno.org/>.
- **Via Letter.** We have pre-addressed letter you can complete and sign. Your signature shows that our neighborhood continued to be engaged.