



## Comments Received After Close of Comment Period



**From:** [uwkkg@aol.com](mailto:uwkkg@aol.com)  
**To:** [Potala EIS](#); [Teresa Swan](#); [Eric Shields](#); [Jeremy McMahan](#); [Kurt Triplett](#); [Robin Jenkinson](#); [Joan McBride](#); [Doreen Marchione](#); [Penny Sweet](#); [Amy Walen](#); [Bob Sternoff](#); [Toby Nixon](#); [Dave Asher](#); [Mike Miller](#); [Jon Pascal](#); [Jay Arnold](#); [Andrew Held](#); [Byron Katsuyama](#); [C. Ray Allshouse](#); [Glenn Peterson](#); [Janet Jonson](#)  
**Cc:** [uwkkg@aol.com](mailto:uwkkg@aol.com); [neighboringproperties@gmail.com](mailto:neighboringproperties@gmail.com)  
**Subject:** Potala and some chuckles to share while we live through the pain  
**Date:** Friday, August 24, 2012 5:43:33 PM

---

Hi all:

Hopefully we can share a chuckle through this process. There has been so much tension...

Here's the funny stuff...

"Concluding that the currently planned Potala project will have only minimal impact on an already congested boulevard is equivalent to saying that it never gets hot in Seattle because the average high temperature is only 76 degrees Fahrenheit.

Or that it is impossible to drown in a pond whose average depth is only six inches.

Or that a man standing in a fire with his head in a block of ice feels just fine on average. A study such as that described in Section 3.4 of the DEIS is commonly referred to as "the flaw of averages" by statisticians."

Hey great picture is attached too. Very important to take a look. The full text below is from a mathematician/engineer and he discusses the faults in our analysis of traffic impact..... But not to stop the laughter.... Happy Friday!!!

Karen Levenson (the rest of this citizen's comments are below)... Hope you laughed as much as I did!!!

-----Original Message-----

From: Mark Taylor <[mark.s.taylor@hotmail.com](mailto:mark.s.taylor@hotmail.com)>  
To: [potalaeis@kirklandwa.gov](mailto:potalaeis@kirklandwa.gov); [tswan@kirklandwa.gov](mailto:tswan@kirklandwa.gov); [eshields@kirklandwa.gov](mailto:eshields@kirklandwa.gov); [jmcmahan@kirklandwa.gov](mailto:jmcmahan@kirklandwa.gov); [ktriplett@kirklandwa.gov](mailto:ktriplett@kirklandwa.gov); [rjenkinson@kirklandwa.gov](mailto:rjenkinson@kirklandwa.gov); [jmcbride@kirklandwa.gov](mailto:jmcbride@kirklandwa.gov); [dmarchione@kirklandwa.gov](mailto:dmarchione@kirklandwa.gov); [psweet@kirklandwa.gov](mailto:psweet@kirklandwa.gov); [awalen@kirklandwa.gov](mailto:awalen@kirklandwa.gov); [bsternoff@kirklandwa.gov](mailto:bsternoff@kirklandwa.gov); [tnixon@kirklandwa.gov](mailto:tnixon@kirklandwa.gov); [dasher@kirklandwa.gov](mailto:dasher@kirklandwa.gov); [mmiller@kirklandwa.gov](mailto:mmiller@kirklandwa.gov); [jpascal@kirklandwa.gov](mailto:jpascal@kirklandwa.gov); [jarnold@kirklandwa.gov](mailto:jarnold@kirklandwa.gov); [aheld@kirklandwa.gov](mailto:aheld@kirklandwa.gov); [bkatsuyama@kirklandwa.gov](mailto:bkatsuyama@kirklandwa.gov); [callshouse@kirklandwa.gov](mailto:callshouse@kirklandwa.gov); [gpeterson@kirklandwa.gov](mailto:gpeterson@kirklandwa.gov)  
Cc: Karen Levinson <[uwkkg@aol.com](mailto:uwkkg@aol.com)>; Chuck Pilcher <[chuck@bourlandweb.com](mailto:chuck@bourlandweb.com)>  
Sent: Fri, Aug 24, 2012 4:11 pm  
Subject: Potala Village EIS traffic study

I am writing in response to the Potala Village Mixed Use Development Draft EIS, specifically Section 3.4 ("Transportation") of the DEIS. As a long-time engineer at AT&T Bell Laboratories, Motorola and elsewhere with an advanced degree in mathematics, I understand both the strengths and weaknesses of the traffic study conducted for the EIS. It is from that perspective that I offer the following comments.

Section 3.4 of the DEIS gets an "A" for presentation: 49 pages in length with numerous figures and tables supporting the text. The section describes both the measurement methodology and the traffic model used in the study.

Average hourly traffic volumes were counted at key intersections in the vicinity of the Potala project over a seven-day period in May 2012 to determine peak traffic timeframes. These busy-hour traffic measurements were combined with those obtained by another firm in 2010 and annual 2% growth projections provided by City of Kirkland Public Works staff to project 2014 volumes. AM busy-hour numbers were based on 2012 measurements and PM busy-hour numbers were based on 2010 measurements. The impact of projected 2014 "without project" traffic volumes was compared with that of projected 2014 "with project" traffic volumes. Traffic volume impact was evaluated in terms of delays at "signalized" and "unsignalized" intersections in the vicinity of the project.

These modeled delays were assigned a qualitative "level of service (LOS)" grade ranging between A ("free flow") and F ("forced flow (jammed)"). LOS grades of E and F require mitigation if a project's proportional share exceeds 15 and 5 percent, respectively. The summary table (Table 3.4-11) indicates that the Potala project will add one to three seconds of additional average delay at signalized intersections and one to twelve seconds at unsignalized intersections. The overall conclusion of the study is that the project's proportional shares at LOS E and F intersections – ranging between one and four percent – were insufficient to require mitigation.

In other words, the traffic volumes in the vicinity of the project are already so high relative to roadway capacity that the impact of additional traffic from the project would be inconsequential. However, the Potala transportation study suffers from a fundamental flaw in that it is based on busy-hour averages of traffic and does not consider the variability of traffic flow that causes queues ("traffic jams") to build. A fundamental tenet of queuing theory – the branch of mathematical statistics that describes phenomena such as traffic flows in communication networks and roadways – is that the variances of the probability distributions are the primary cause of extreme conditions, such as that depicted in the attached picture of northbound Lake Washington Blvd at 62nd Street on a typical weekday afternoon this past June. A model based on average traffic volumes would never project this everyday reality. Concluding that the currently planned Potala project will have only minimal impact on an already congested traffic situation based on the traffic study of the EIS is equivalent to saying that it never gets hot in Seattle because the average high temperature is only 76 degrees Fahrenheit. Or that it is impossible to drown in a pond whose average depth is only six inches. Or that a man standing in a fire with his head in a block of ice feels just fine on average. A study such as that described in Section 3.4 of the DEIS is commonly referred to as "the flaw of averages" by statisticians.

But, to those with limited mathematical background this superficial study will appear to be conclusive, and it will provide ample posterior coverage for city officials. However, a more rigorous study is likely to conclude just the opposite, and should be conducted in the name of responsible governance.

Respectfully, Mark S. Taylor  
6202 Lake Washington Blvd NE

**From:** [Justin Stewart](#)  
**To:** [Potala EIS](#)  
**Subject:** Potala Village Draft EIS Comments (Re-sending due to possible failure of 1st attempt)  
**Date:** Friday, August 24, 2012 7:17:11 PM

---

Your modeling for Scenario 1 in Figure 3.3-19 appears to place the building closer to the street than the required 30' setback.

For Scenario 2 you list approximately 90 units. In my experience I don't think that would be possible with this configuration. If you do a simple gross square foot calculation I think you will find that this configuration would result in a lot fewer units.

For Scenario 2 I believe the elevation of the east building would be higher than you have it modeled.

For Scenario 3 I am not sure how that shape would work while still maintaining means of emergency egress (operable windows) in each bedroom. Courtyards or window wells are usually utilized to provide for this.

Justin Stewart, LEED® AP  
Executive Vice President | Path America | 425.275.7000 (mobile)

**From:** [uwkkg@aol.com](mailto:uwkkg@aol.com)  
**To:** [Potala EIS](#); [Teresa Swan](#); [Eric Shields](#); [Jeremy McMahan](#); [Kurt Triplett](#); [Robin Jenkinson](#); [Janet Jonson](#); [Joan McBride](#); [Doreen Marchione](#); [Penny Sweet](#); [Amy Walen](#); [Bob Sternoff](#); [Dave Asher](#); [Toby Nixon](#); [Mike Miller](#); [Jon Pascal](#); [Jay Arnold](#); [Andrew Held](#); [Byron Katsuyama](#); [C Ray Allshouse](#); [Glenn Peterson](#)  
**Cc:** [uwkkg@aol.com](mailto:uwkkg@aol.com); [neighboringproperties@gmail.com](mailto:neighboringproperties@gmail.com)  
**Subject:** DEIS Chapter 2 shortcomings and comments  
**Date:** Saturday, August 25, 2012 3:12:22 PM  
**Attachments:** [Potala DEIS Chapter 2 - 1.pdf](#)  
[Potala DEIS Chap 2 Comments Easy Read Format.pdf](#)

---

This is Chapter 2. PDF of DEIS comments submitted by the 8/24 5pm cutoff for Potala.

These same (or similar) errors, items missed by EIS  
Consultants, etc should be corrected where appropriate in this chapter  
- AND WHERE SAME, or similar issues, OCCUR IN OTHER CHAPTERS

Sincerely, Karen Levenson, 6620 Lake Washington Boulevard NE, Kirkland  
This is submitted also on behalf of my family, my HOA, local neighbors  
and HOAs that have asked me to represent them, clients of Brian Lawer,  
clients of David Mann, neighbors of "One Neighborhood Block" and  
citizens represented by STOP

-----Original Message-----

To: PotalaEIS <[PotalaEIS@kirklandwa.gov](mailto:PotalaEIS@kirklandwa.gov)>; Tswan <[Tswan@kirklandwa.gov](mailto:Tswan@kirklandwa.gov)>  
Sent: Fri, Aug 24, 2012 4:55 pm  
Subject: Potala DEIS Chapter 2 shortcomings and comments

Here's the problems that need fixing in chapter 2

Karen Levenson  
6620 Lake Washington Boulevard NE, Kirkland  
This is submitted also on behalf of my family, my HOA, local neighbors  
and HOAs that have asked me to represent them, clients of Brian Lawer,  
clients of David Mann, neighbors of "One Neighborhood Block" and  
citizens represented by STOP

**From:** [uwkkg@aol.com](mailto:uwkkg@aol.com)  
**To:** [Potala EIS](#); [Teresa Swan](#); [Eric Shields](#); [Jeremy McMahan](#); [Kurt Triplett](#); [Robin Jenkinson](#); [Janet Jonson](#); [Joan McBride](#); [Doreen Marchione](#); [Penny Sweet](#); [Amy Walen](#); [Bob Sternoff](#); [Dave Asher](#); [Toby Nixon](#); [Mike Miller](#); [Jon Pascal](#); [Jay Arnold](#); [Andrew Held](#); [Byron Katsuyama](#); [C Ray Allshouse](#); [Glenn Peterson](#)  
**Cc:** [uwkkg@aol.com](mailto:uwkkg@aol.com); [neighboringproperties@gmail.com](mailto:neighboringproperties@gmail.com)  
**Subject:** Potala EIS: Chap 3.1 Density Miscalculation and Chapter 3.1 annotated  
**Date:** Saturday, August 25, 2012 3:35:38 PM  
**Attachments:** [2012 EIS DENSITY.xls](#)  
[2012 Potala Chapter 3 1 with neighbor notations.pdf](#)  
[Potala DEIS Chapt 3.1 Easy Read Comments.pdf](#)

---

City officials:

This is Chapter 3.1 PDF of DEIS comments submitted by the 8/24 5pm cutoff for Potala.

The comments on the pages of the DEIS may be hard to read and you may need to refer to the easier to read Annotations summary (attached).

These same (or similar) errors, items missed by EIS Consultants, etc should be corrected where appropriate in this chapter - AND WHERE SAME, or similar issues, OCCUR IN OTHER CHAPTERS

(See full letter below from Laura Loomis)

Sincerely, Karen Levenson, 6620 Lake Washington Boulevard NE, Kirkland  
This is submitted also on behalf of my family, my HOA, local neighbors and HOAs that have asked me to represent them, clients of Brian Lawer, clients of David Mann, neighbors of "One Neighborhood Block" and citizens represented by STOP

=====  
From: Laura Loomis <lauraloomis@charlesloomis.com>  
To: <PotalaEIS@Kirklandwa.gov>; <Tswan@kirklandwa.gov>; <eshields@kirklandwa.gov>  
Sent: Sat, Aug 11, 2012 1:25 pm

Good Morning everyone:

My name is Laura Loomis and my husband and I live in a one story single family home at 100 10th Ave South across the street from the proposed Potala Development. Our home is part of the study area included in the land use chapter of the Environmental Impact Study.

Kirkland has chosen to regulate the intensity of use (density) of residential properties by measuring units per acre. This is documented in the current citywide EIS. This is the chosen benchmark for density, and is the focus of my comments.

I strongly disagree with the lack of attention given to single family homes in the land use chapter. It states that the majority of the study area is multifamily homes. This is a gross mischaracterization. Our neighborhood group has accounted for every building within the study area and the opposite is true. There are 81 single family homes and only 44 multi-family homes in the study area.

There is a 2/3 majority of Single Family residences! Our home is built to a density of only 6.66 units/acre. As one of the single family homeowners in the study area, which consists of 50% one story structures, I believe we contribute greatly to the ambiance of the

area. We are the predominant land use. I am shocked by the misrepresentation of the facts in this study. I want to believe it was accidental and that the person doing the calculations did not personally visit the study area. I do not want to believe that a supposedly unbiased study was biased. I encourage you to correct this very egregious error in the EIS as soon as possible.

Beyond the incorrect representation of the single family land use, there are numerous errors in calculations for the multifamily buildings which will also require correction. Neighbors have noted that there are more than 15 errors and 82 omissions, in chapter 3.1 of the EIS. These calculations are misleading by an astronomical amount. This greatly overstates the intensity of development that is seen as land use in the subject area.

I also protest that photos were taken from the vantage of 2nd & 10th Ave. South instead of 1st and 10th Avenue South to demonstrate the affect of the Potala project on blocking neighborhood views. This made it seem like there would be no impact on views of the residences on this street. This is another misrepresentation of the facts and I question why photos were not taken from both vantages to give people a clearer representation of the impacts.

On behalf of myself and my spouse, as well as all the neighbors in the study area and members of STOP and of "One Neighborhood Block." I expect to see an accurate characterization and description of land use in the final EIS. Please ensure this is corrected. Otherwise, the old saying of "Garbage in, garbage out" will apply to this EIS document. I am attaching two documents that will point out areas of miscalculations and misstatements in Chapter 3.1.

Sincerely,  
Laura Loomis  
100 10th Ave S  
Kirkland WA 98033  
=====

Sincerely, Karen Levenson, 6620 Lake Washington Boulevard NE, Kirkland  
This is submitted also on behalf of my family, my HOA, local neighbors and HOAs that have asked me to represent them, clients of Brian Lawer, clients of David Mann, neighbors of "One Neighborhood Block" and citizens represented by STOP

**From:** [uwkkg@aol.com](mailto:uwkkg@aol.com)  
**To:** [Potala EIS](#); [Teresa Swan](#); [Eric Shields](#); [Jeremy McMahan](#); [Kurt Triplett](#); [Robin Jenkinson](#); [Janet Jonson](#); [Joan McBride](#); [Doreen Marchione](#); [Penny Sweet](#); [Amy Walen](#); [Bob Sternoff](#); [Dave Asher](#); [Toby Nixon](#); [Mike Miller](#); [Jon Pascal](#); [Jay Arnold](#); [Andrew Held](#); [Byron Katsuyama](#); [C Ray Allshouse](#); [Glenn Peterson](#)  
**Cc:** [uwkkg@aol.com](mailto:uwkkg@aol.com); [neighboringproperties@gmail.com](mailto:neighboringproperties@gmail.com)  
**Subject:** Potala DEIS Chapter 3.2 (CP Vision/Goals) Neighbor comments - Corrections needed  
**Date:** Saturday, August 25, 2012 3:45:25 PM

---

Dear City Officials:

This is Chapter 3.2 (CP Vision/Goals) of DEIS comments submitted by the 8/24 5pm cutoff for Potala.

These same (or similar) errors, items missed by EIS Consultants, etc should be corrected where appropriate in this chapter - AND WHERE SAME, or similar issues, OCCUR IN OTHER CHAPTERS

-----Original Message----- From: uwkkg <[uwkkg@aol.com](mailto:uwkkg@aol.com)>  
To: <[PotalaEIS@kirklandwa.gov](mailto:PotalaEIS@kirklandwa.gov)>; <[Tswan@kirklandwa.gov](mailto:Tswan@kirklandwa.gov)>; <[Eshields@kirklandwa.gov](mailto:Eshields@kirklandwa.gov)>  
Sent: Fri, Aug 24, 2012 4:40 pm

Citizen comments pointing out shortcomings of EIS in Chapter 3.2 Vision and Framework Goals. These need to be farther investigated and documented by the consultant and better mitigation must be suggested

Comprehensive Plan Chapter II Vision/Framework Goals  
While the EIS consultants include framework goal FG-3 and FG-13, they fail to include FG-1, FG-8, FG-09, FG-12, and FG-14 all of which have substantial, important bearing on the overall review of "All the Impacts" which is necessary for a complete and accurate EIS.

FG-1 requires "Maintain and enhance Kirkland's unique character." It goes on to state that each of the City's neighborhoods and businesses has its own distinctive identity and a prime goal is to protect and improve those qualities that make our neighborhoods and business districts so attractive." EIS consultants should be able to reference the citizen comments and their own conclusions that the proposal does not maintain the current unique neighborhood character of the area in which it is proposed.

FG-8 requires "Maintain and enhance Kirkland's strong physical, visual, and perceptual linkages to Lake Washington." This goal then goes on to discuss the importance of maintaining lake and territorial views from public spaces in the west facing slopes.

FG-9 requires "Provide safety and accessibility for those who use alternative modes of transportation within and between neighborhoods" It then states that an important part of Kirkland's existing character is its safety and accessibility for pedestrians, bicyclists and alternative modes of transportation. The proposal has been identified by traffic engineer and public safety as well as neighbors and the EIS consultants as one where the driveway will create severe impact on pedestrian, bicycle and alternative transit on the east side of the boulevard. The reduced safety and the increased likelihood of pedestrian or bicycle accidents has been clearly identified with respect to this proposal and yet the EIS consultants do not include FG-9 or sufficient discussion of how the project can be mitigated to

support FG-9.

FG-12 requires that the public safety be ensured with respect to Police and Fire Protection. This will require obtaining new response times based on the fact that the only street accessing many properties in an emergency is the boulevard. When the LOS changes from C to E that length of delay for emergency vehicles must be investigated in order to document the new response time and this must be listed as a significant impact and then mitigated sufficiently.

FG-14 requires that while Kirkland must plan for its fair share of regional growth, "careful attention must be paid to ensure that growth is accommodated in a manner that complements rather than detracts from Kirkland's unique character. Clearly the incompatibilities identified by the citizens of Kirkland and by the EIS consultants are examples of where the proposal fails to implement FG-14 and farther discussion and substantial mitigation measures are needed.

Karen Levenson

6620 Lake Washington Boulevard NE, Kirkland

This is submitted also on behalf of my family, my HOA, local neighbors and HOAs that have asked me to represent them, clients of Brian Lawer, clients of David Mann, neighbors of "One Neighborhood Block" and citizens represented by STOP

**From:** [uwkkg@aol.com](mailto:uwkkg@aol.com)  
**To:** [Potala EIS](#); [Teresa Swan](#); [Eric Shields](#); [Jeremy McMahan](#); [Kurt Triplett](#); [Robin Jenkinson](#); [Janet Jonson](#); [Joan McBride](#); [Doreen Marchione](#); [Penny Sweet](#); [Amy Walen](#); [Bob Sternoff](#); [Dave Asher](#); [Toby Nixon](#); [Mike Miller](#); [Jon Pascal](#); [Jay Arnold](#); [Andrew Held](#); [Byron Katsuyama](#); [C Ray Allshouse](#); [Glenn Peterson](#)  
**Cc:** [uwkkg@aol.com](mailto:uwkkg@aol.com); [neighboringproperties@gmail.com](mailto:neighboringproperties@gmail.com)  
**Subject:** Potala DEIS Chapt 3.2 Community Character deficient review & mitigations  
**Date:** Saturday, August 25, 2012 3:53:49 PM

---

Dear City Officials:

This is Chapter 3.2 (CP Community Character) of DEIS comments submitted by the 8/24 5pm cutoff for Potala.

These same (or similar) errors, items missed by EIS Consultants, etc should be corrected where appropriate in this chapter - AND WHERE SAME, or similar issues, OCCUR IN OTHER CHAPTERS

-----Original Message-----

From: Uwkkg <[Uwkkg@aol.com](mailto:Uwkkg@aol.com)>  
To: <[PotalaEIS@kirklandwa.gov](mailto:PotalaEIS@kirklandwa.gov)>; <[tswan@kirklandwa.gov](mailto:tswan@kirklandwa.gov)>; <[eshields@kirklandwa.gov](mailto:eshields@kirklandwa.gov)>  
Sent: Fri, Aug 24, 2012 4:46 pm

I am submitting these comments about the EIS Chapter 3.2 and the section on Community Character. It identifies numerous problems and many omissions by the EIS team. We expect to see a better document with suggestions that will truly mitigate the project to a level where it meets with Kirkland codes and policies

Comprehensive Plan - Community Character

The EIS consultants provide only minimal evaluation of the proposal with respect to Community Character Goals and Policies of the Comprehensive Plan. They limit their review to only CC-4.1 and 4.5. They fail to also review the following CC 1.4 and CC 4.6

CC-1.4 requires "Encourage and develop places and events throughout the community where people can gather and interact. This goes on to include "The city should encourage private developers to integrate public art into office, retail and multifamily projects. This oversight on the part of the EIS consultants is quite substantial because Kirkland requires a certain amount of open recreational space where multi-unit residences are built and the Proposal fails to meet the 200 sq ft per unit requirement. Additionally, the commercial designation of the subject property requires community gathering spaces. The EIS consultants need to include this in their review and suggest mitigation that will ensure that the development satisfies this criteria. Additionally the inclusion of public art and lush landscaping along the boulevard is provided by every building along this signature boulevard. To fit within the character of the neighborhood, this project must provide similar public art, fountains, and greenery.

CC-4.6 requires "Preserve natural landforms, vegetation, and scenic areas that contribute to the City's identity and visually define the community, its neighborhoods and districts." This goes on to discuss "Open space and areas of vegetation are valuable because they accentuate natural topography, define the edges of districts and neighborhoods, and provide a unifying framework and natural contrast to

the City's streets, buildings and structures. Landscaping can improve the community character. Several neighborhoods contain unique natural features, including significant stands of trees. The intent of this policy is not to prohibit development but to regulate development activities to ensure they maintain the inherent values of the natural landscape." A more in-depth discussion of this matter is needed in the EIS. The subject properties have a dramatic slope that provides character and will be removed by excavation. More importantly there are numerous very significant trees that provide much of the character of this part of the neighborhood as well as providing habitat for many birds, including the neighborhood bald eagle. The EIS should discuss mitigations to include building around the significant trees rather than pulling out these significant trees and replacing with small street trees. The discussion of landscaping to provide community character is also in need of greater discussion as the proposal will otherwise be the only property along the boulevard that is devoid of any significant front landscaping.

CC-4.10 requires "Maintain and enhance the appearance of streets and other public spaces." It is important to note that the residential market designation which is specifically assigned to this property at the time of application requires community gathering spaces. For this reason there should be more discussion and mitigations required to support this item.

CC-4.11 requires "Minimize impacts from noise, lighting, glare and odor." This goes on to state that "As the community becomes more urban with mixed uses and denser development, impacts, such as noise, lighting, glare and odor, may occur. The City should have development regulations and urban design principles to reduce and, in some cases, prohibit these impacts. Site design, building orientation, landscape buffers ... and limitation on business hours of operation are some of the techniques that may be used." These provisions are very important. We see again here the emphasis on things like landscape (which is basically non-existent with the proposal). We see the importance of site design, building orientation and landscape buffers.....Of particular importance, this item calls out the negative impacts of density... these are specifically the independent negative impacts of density that the neighbors have been identifying during this process... noise, lighting, glare and odor. The proposal as suggested is so overly large and so overly filled with people that the site design will never be able to avoid numerous windows with light or noise or odor that will trespass into the lives of existing neighbors. A smaller building with less residents and less windows would allow for the building to be sited in such a way that windows could be staggered so as not to look so directly into the backyards, patios, balconies and windows of the existing neighbors. The amount of noise, lighting, glare and odor can be vastly reduced by a lower density and thoughtful site design. The EIS consultants haven't even scratched the surface on this issue. They need to fully explore the number of residents, the number of resulting windows, the amount of direct exposure to the neighbors of noise, light, glare and odor. This is an issue that greatly requires a look at a lower intensity development on the site. The EIS consultants need to identify substantial ways to minimize these impacts and thus support city regulations.

CC-4.12 requires "Support multimodal transportation options." and goes on to state "Public improvements and site design each play an important role in encouraging the use of alternative transportation modes." Site

design is to be sensitive to these transportation modes however the proposal for 143 units and commercial with one busy driveway has already been identified as a deterrent to pedestrian and bicycle use of the east side of the boulevard and an increased safety hazard for them. Most troubling is that this is one of Kirkland's identified priority bicycle and pedestrian routes. EIS consultants gave sparse, if any comment on the impact this will have on this alternative transportation route. Remember, the EIS is supposed to provide a "hard look" at all impacts. EIS document is quite flawed without a more in-depth discussion of the impact that this project will have on transport due to the fact that the concurrency study concluded that 1 car will traverse the driveway every 30 seconds at peak pm.

Karen Levenson

6620 Lake Washington Boulevard NE, Kirkland

This is submitted also on behalf of my family, my HOA, local neighbors and HOAs that have asked me to represent them, clients of Brian Lawer, clients of David Mann, neighbors of "One Neighborhood Block" and citizens represented by STOP

**From:** [uwkkg@aol.com](mailto:uwkkg@aol.com)  
**To:** [Potala EIS](#); [Teresa Swan](#); [Eric Shields](#); [Jeremy McMahan](#); [Kurt Triplett](#); [Robin Jenkinson](#); [Janet Jonson](#); [Joan McBride](#); [Doreen Marchione](#); [Penny Sweet](#); [Amy Walen](#); [Bob Sternoff](#); [Dave Asher](#); [Toby Nixon](#); [Mike Miller](#); [Jon Pascal](#); [Jay Arnold](#); [Andrew Held](#); [Byron Katsuyama](#); [C Ray Allshouse](#); [Glenn Peterson](#)  
**Cc:** [uwkkg@aol.com](mailto:uwkkg@aol.com); [neighboringproperties@gmail.com](mailto:neighboringproperties@gmail.com)  
**Subject:** Potala DEIS Chap 3.2 Natural Env: Consultant oversights need review/mitigation  
**Date:** Saturday, August 25, 2012 4:00:52 PM

---

Dear City Officials:

This is Chapter 3.2 (CP Natural Env) of DEIS comments submitted by the 8/24 5pm cutoff for Potala.

These same (or similar) errors, items missed by EIS Consultants, etc should be corrected where appropriate in this chapter - AND WHERE SAME, or similar issues, OCCUR IN OTHER CHAPTERS

-----Original Message----- From: uwkkg <[uwkkg@aol.com](mailto:uwkkg@aol.com)>

To: <[PotalaEIS@kirklandwa.gov](mailto:PotalaEIS@kirklandwa.gov)>; <[tswan@kirklandwa.gov](mailto:tswan@kirklandwa.gov)>; <[eshields@kirklandwa.gov](mailto:eshields@kirklandwa.gov)>  
Sent: Fri, Aug 24, 2012 4:49 pm

Comprehensive Plan - Natural Environment

The EIS Consultants provide absolutely no review of the Natural Environment provisions of the Comprehensive plan. This is one of hundreds of areas of deficiency in the EIS. These must be included, discussed and ADEQUATELY mitigated

Specifically the EIS should be addressing

NE-1.8 requires "Strive to minimize human impacts on habitat areas." This goes on to state that "In addition to physical alterations of natural resources, less obvious impacts, such as those from noise and light, should be minimized." The area is known habitat for numerous species of birds and is a known area used frequently by the neighborhood bald eagle. Not only does the current proposal make the parcel completely bald of mature trees and foliage, it will add a tremendous amount of noise and light. Discussion should be on how to minimize these impacts which may be unavoidable unless the size and density of the structure are reduced and the mature trees are maintained.

NE-2.2 requires "Protect surface water functions by preserving and enhancing natural drainage systems wherever possible" This goes on to state that "Urban development, through addition of impervious surface and removal of vegetation, increases the volume and rate and decreases the quality of stormwater runoff." "Steps to limit this damage include -Minimizing creation of new impervious surfaces, maximize use of soils and vegetation in slowing and filtering runoff, installing structural flow control facilities at new or redeveloping sites where appropriate to mimic the predevelopment hydrologic regime, require projects to provide water quality treatment facilities if they propose to alter or increase significant quantities of impervious surface" This discussion in the Comprehensive Plan is very important with respect to subject

property. Currently there is a great deal of pervious soil as about 1/4 of the property is covered in vegetation. There will be a tremendous shift towards pervious surface since the applicant has stated that he will be at 80% lot coverage. On top of that there will be driveways and other impervious surfaces replacing vegetation. A full study done by a skilled professional should be included in this EIS so that these issues are sufficiently addressed by development on the site.

NE-2.3 requires "Comprehensively manage activities that may adversely impact surface and ground water quality or quantity. (see our discussion in NE-2.2)

NE-2.4 requires "Improve management of stormwater runoff from impervious surfaces by employing low impact development practices where feasible (see our discussion in NE-2.2)

NE-3 requires "manage the natural and built environments to protect and, where possible to enhance and restore vegetation.

NE- 3.1 requires "Work toward increasing Kirkland's tree cover to 40%." EIS Consultants should describe, at a minimum, how the proposal will be required to mitigate in order to at least achieve no net loss."

NE-3.2 requires "Preserve healthy mature native vegetation whenever feasible." This goes on to state that "Healthy mature native vegetation contributes numerous ecological benefits to the community, including oxygen production, provision of fish and wildlife habitat, filtration of stormwater runoff, erosion reduction, hillside and stream bank stabilization moderation of temperature, interception of rainfall that would otherwise become surface runoff, and scenic beauty." The EIS Consultants need to discuss how this will be achieved or mitigated since numerous mature trees and a great deal of vegetation will be replaced with impervious surface and will no longer serve these functions. Less lot coverage would allow for more preservation of this vegetation and its benefits.

NE-3.3 requires "Ensure that regulations, incentives and programs maximize the potential benefits of landscaping" This part of the comprehensive plan needs to be fully reviewed due to the numerous benefits outlined. Landscape is severely lacking in the proposal and all of these statements about appropriate landscaping and its benefits need to be explored and applied to this EIS review.

Karen Levenson  
6620 Lake Washington Boulevard NE, Kirkland  
This is submitted also on behalf of my family, my HOA, local neighbors and HOAs that have asked me to represent them, clients of Brian Lawer,

clients of David Mann, neighbors of "One Neighborhood Block" and  
citizens represented by STOP