

June 10, 2005

Joe Burcar  
Island County Planning & Community Development Department  
PO Box 5000  
Coupeville, WA 98239

Dear Mr. Burcar:

Re: Comments on Nichols Brothers Boat Builders, Inc. (“NBBBI”) Master Permit Submittals

The Shorelands & Environmental Assistance Program staff in the Department of Ecology’s Northwest Regional Office has reviewed the material submitted by NBBBI on March 28, April 25 and May 25, 2005 and has the following comments:

We commend NBBBI and its consultants for the excellent job they have done in providing the large amount of requested material within the required timeframe.

**Landscape and Visual Analysis:** It is clear that an accurate assessment of site aesthetics must await final decisions on which existing buildings will be retained, how many new buildings will be added, the locations of fixed vs. modular structures, etc. In making final decisions about the size and placement of buildings, however, we ask that NBBBI consider the following. We respectfully disagree with the statement in the 3<sup>rd</sup> paragraph, page 17 of the analysis which states, in speaking of impacts anticipated from the proposed “temporary structures”: “Since the proposed impacts are not permanent in nature, they do not demand the same level of mitigation as a permanent structure would.” On page 2 of 6, in a letter dated April 25, 2005 to Joe Burcar, NBBBI appears to indicate that for the construction of a single hypothetical 360’ passenger boat, various modular sections (on a rotating basis) would be elevated to their full 65’ height for a period of approximately 11 months. Based on additional information submitted by NBBBI, it seems quite possible that two or more other boats would be under construction at the same time. This makes it unlikely that at any given time, all the modular sections would be lowered to their 40-foot height. Instead, they would be continually raised and lowered to meet the demands of the boats being circulated through the production area. Whereas the impacts of a given modular unit might be termed “temporary”, the combined effect of all modular units in use at a given time would result in continual visual impacts, not all of which can be mitigated.

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Monitoring and contingency plans such as those provided in the eelgrass mitigation plan should be required as a component of a landscape plan that details plant species and planting densities.

**Grading Plan:** The 5/23/05 Site Grading and TESC Plan requires more specificity as to how and where the BMPs will be utilized. It is also not clear if run-off from the parking area will be controlled through the main stormwater system or separately. Ecology is particularly concerned that stormwater leaving the parking area be adequately managed to avoid any impacts to the wetland.

**Rail Launch System:** The photograph with the simulated rail system superimposed to indicate its appearance at high tide helps reviewers visualize the very low profile of the proposed system. We recommend producing additional photos to show the rail system's appearance at low tide and at other tidal elevations. It might also be interesting to compare the height of the proposed NBBBI rail system with those of the nearby rail system, docks, etc.

**Navigation:** It might help to allay public concern if NBBBI, with input from the US Army Corps of Engineers and the US Coast Guard, were to provide visual mock-ups of alternative rail marking systems (such as rail paint, marker buoys, flags, etc.) that could be installed out to the depth at which navigation hazards no longer exist.

We look forward to reviewing the site's stormwater plan, a critical component of the master permit, and to helping resolve other remaining shoreline- and wetland-related application issues.

Sincerely,

Alice Schisel  
Shoreline Planner

cc: Jeannie Summerhays