



November 30, 2005

Phillip Bakke, Director  
 Island County Community Development  
 PO Box 5000  
 Coupeville, WA 98230

**RE: EIS Scoping Document: Nichols Brothers Boat Builders, Inc. 15-Year Master Plan (Master Plan file number SPR 387/04)**

To Mr. Bakke:

People For Puget Sound supports the requirement of an EIS for the *Nichols Brothers Boat Builders, Inc. 15-Year Master Plan*. This proposed project represents a significant development in the shoreline zone. The project is located in Holmes Harbor, which has several fish and wildlife conservation areas including wetlands, eelgrass beds and herring and smelt spawning areas, as well as recreational and commercial shellfish beds.

People for Puget Sound is a citizens' organization whose mission is to protect and restore Puget Sound and the Northwest Straits.

Our specific comments follow:

1. **Sediment study must be performed.** Significant pollution from historic and current operations at the facility may have impacted the sediment quality in the vicinity of outfalls. Metals, organic chemicals and petroleum products may have been discharged both with process water and stormwater from the site. A history of flooding as well as broken tidegates support this request.
2. **Particular attention must be paid to stormwater and other impacts to the wetland.** It appears that the infiltration basin for wastewater from this site is constructed within a wetland. This siting is unacceptable to People For Puget Sound because contaminated water is being infiltrated into the middle of a sensitive wetland. A further expansion of the site will result in increased toxic contaminant loads into this basin. A full hydrogeologic study should be required as well as consideration of alternative siting.
3. **Alternative siting.** Through a standard environmental impact analysis, alternative projects and alternative locations are typically assessed and published for public review. We expect that alternatives will be identified and analyzed for this facility.

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This site has three major constraints:

- a. It is within the shoreline zone in a location with relatively good habitat and water quality.
- b. The location is designated for “light manufacturing.”
- c. A deep-water operation is being proposed for a tidal flat location.

We strongly recommend that one of the alternatives assessed will be the relocation of Nichols Brothers’ larger ship operations to an alternative site while continuing the building of smaller boats at their existing location.

**4. Global warming.** This facility is located in a low-lying area that will likely be impacted by sea level rise due to Global Climate Change. Flooding already occurs at Shoreline Road, even without sea level rise. This issue should be factored into the EIS.

If you have any questions, please feel free to call me at (206) 382-7007 or Mike Sato at (360) 336-1931. Thank you for the opportunity to comment.

Sincerely,

Heather Trim,  
Urban Bays Project Coordinator

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