Visual Impact Analysis

and

Navigation Concerns Assessment

Re: Taylor Resources Inc.
Totten Inlet Mussel Farming Project
(Land Use Case No. SSDP961372)
(SEPA Case No. SEPA9613720)

Prepared by:

APHETI
Association for the Protection of Hammersley, Eld and Totten Inlets

May 22, 1998
INTRODUCTION

As residents of the South Puget Sound area, as citizens concerned with the commercial dominance of public resources, and as taxpaying home and property owners near proposed aquaculture industrial sites, APHETI (the Association for the Preservation of Hammersley, Eld and Totten Inlets) has prepared a Visual Impact Analysis and Navigation Concerns Assessment.* The purpose of this document is to provide Thurston County** officials with information that will assist them in making a thoughtful decision regarding the permitting of the Totten Inlet Mussel Project*** applied for by Taylor Resources, Inc.(Land Use Case No. SSDP961372)(SEPA Case No.SEPA9613720). It is our contention that this project should not go forward.

As part of this report you will find a detailed Visual Impact Assessment measuring the potential effects of the project on the aesthetics of the area and the quality of life of the people nearby. The presence of the rafts, coupled with the actual accessing of the proposed sites for building, maintaining, harvesting and transporting purposes, has a cumulative effect that dramatically impacts the environment and aesthetic appeal of the area. Public Use and safety concerns are also at issue and are enumerated in the second section entitled Navigation.

Instruments utilized in our analysis are the same ones Taylor Resources, Inc. applied in presenting their perspective concerning the impact of the project, i.e. The State of Washington Department of Ecology’s Aquaculture Siting Study (EDWA Inc., CH2MHILL, 1986)**** and the Visual Impact and Environmental Concerns Assessment for the Totten Inlet Mussel Rafts Project***** prepared by EDWA, Inc. as a component of the Mussel Project application. While our calculations are the same or similar in several areas, there are specific significant differences in our findings that highlight important discrepancies between Taylor Resources, Inc.'s conclusions and APHETI's.

*The APHETI Study
**The County
***The Project
****The Assessment Tool
*****The EDWA Assessment
VISUAL IMPACT ASSESSMENT

OVERVIEW—RATIONALE
Provided in Section 2.1 (Impact Assessment Overview) of the EDWA Assessment is a fairly objective explanation of what is at issue in terms of (2.1.1) Landscape Setting, (2.1.2) The Viewer, (2.1.3) Facility Siting and Design, and (2.1.4) Visual Assessment. Please see that document for details.

The state Shoreline Act directs counties to address the potential visual impact of proposed aquaculture facilities in their Shoreline Masters Programs. The act states: "...the protection of visual assets of shore lands and water bodies as a primary objective of shoreline management. In developing and applying a program to shore lands and adjacent areas, consideration must be given to protection of the visual quality of the shoreline resource and to maintenance of view corridors to waterways and shore land features. In the implementation of this policy, the public's opportunity to enjoy the physical and aesthetic qualities of natural shorelines of the state shall be preserved to the greatest extent feasible consistent with the overall best interest of the state and the people generally."

The existing mussel site at Gallagher Cove is a blight on the aesthetic quality of the environment and the lifestyle of nearby residents. Furthermore, additional rafts brought in to expand the project and create a new site in northern Totten Inlet would only exacerbate the problem through the cumulative impact of more rafts, more boat and truck traffic, more smell, more noise from harvesting machinery, and more debris in the water from careless management policies and activities. Such projects hardly preserve "...the public's opportunity to enjoy the physical and aesthetic qualities of natural shorelines of the state..."

METHODOLOGY
At the root of the discrepancies between the EDWA Assessment results and the APHETI Assessment results is the number of sites that were studied as data was gathered. APHETI selected five sample properties (critical vantage points) adjacent to each of the proposed sites (Attachments 1 and 2 Map with sites identified). This is in contrast to the single site near each proposed location studied in the EDWA Assessment. Since Gallagher Cove is a concave embayment, we felt that a complete analysis should include inventory and evaluation ratings from a variety of locations and that the impact should be gauged by a composite analysis. At the North Totten site five homes sites were assessed, extending to about two thousand feet from the proposed location of the rafts. Again we felt that a composite analysis would be required because of the varying shore heights, the size of the proposed site, the number of viewers impacted and their high level of sensitivity and concern for scenic quality. The residents at both sites have designed and built their homes to take full advantage of their views and each has at least one key viewpoint in their yard.
The sites were inventoried and evaluated, and photographs were taken during visits documented in attachment s 3 - 13. As was done in the EDWA Assessment and stated in that document: "All photographs were taken using a 35 mm camera with a 50 mm lens. Thus, each frame (individual photograph) represents approximately a 60 degree cone of vision. This is the amount of a given scene a viewer (assuming 20:20 vision) is able to see from a static setting". The photos were taken from locations on the sites identified by the residents as high use areas. The inventory and analysis survey instruments were completed at each respective site.

GALLAGHER COVE INVENTORY AND ANALYSIS

LANDSCAPE SETTING

Environmental Conditions The Gallagher Cove mussel raft site is in a concave embayment and is viewed directly by people living in two residential areas; Mirimichi Beach to the west and Boston Harbor Waterfront (Olympic View community) to the east. The area is considered rural but is growing rapidly as waterfront and water view lots are purchased and built upon. The natural environment is one of cultivated and naturally forested vegetation, and the shoreline topography is varied in height ranging from what would be categorized as "high bank" to "no bank" waterfront. The existing rafts are a dominating fixture in the view, located at the entrance to Gallagher Cove. (see photograph in attachment 5)

Spatial Definition Gallagher Cove is a relatively confined area with many residences facing the opposite shoreline across the cove. For these homes, the existing (and proposed) mussel rafts are viewed as being within the confines of the cove. Other homes have been built to take advantage of both the water view and the view of the Olympic Mountains, and the rafts are in the foreground with the water and the mountains as a backdrop.

Adjacent Scenery Since the existing (and proposed) mussel raft site is located within a concave embayment, it figures prominently in the overall scenic effect. Viewed from adjacent shorelines of moderate to high bank lots, the flat plane of the water becomes a focal point, making the rafts evident and visually impacting. Distant land forms such as high banks, forested hills, and snowcapped mountains provide a combination of form and texture and help frame and focus the viewers' attention, furthering the impact of the industrial structures and activities.

Bank Height Residences on the west side of the cove sit along bluff tops ranging from 40 to 80 feet in height. The Boston Harbor Waterfront to the east has banks ranging from 5 to 25 feet.
**THE VIEWER**

**Viewer Expectations** Mussel rafts at Gallagher Cove are a recent addition to the landscape and view of the area. Most of the residences nearby were designed and built before these rafts were installed, and other building lots were purchased before people were aware of the eventual industrial activities planned for the cove. Because of the county's minimal requirements for notification of the public regarding proposed aquaculture sites of this kind, most residents were unaware of the permitting and surprised by the placement of the rafts. "If I had known there was a permit for mussel rafts in the works I would have opposed it." "I wouldn't have bought this lot if I knew this was going to happen!" Comments such as these are common when nearby land owners are asked to comment on the existing mussel rafts. It is erroneous conjecture to assume that the existing rafts "...are likely an accepted part of the landscape..." (EDWA Assessment p.14) Therefore, it has been determined that viewer expectation of people exposed to Gallagher Cove mussel rafts can be categorized as high.

**Number of Viewers** The area surrounding Gallagher Cove, Mirimichi Beach and Boston Harbor Waterfront, is low in population density but growing, as is the Steamboat Island area in general. During the spring and summer the number of viewers increases substantially as visitors and house guests come to enjoy the recreational and scenic treasures of the area, therefore, the number of viewers can be categorized as relatively low but growing with an element of fluctuation.

**Viewer Duration** As stated in the EDWA Assessment: "Because the majority of the viewers live in the residences surrounding Gallagher Cove the potential exists for sustained views. This factor would indicate a high viewer sensitivity level in regards to view duration".

**FACILITY SITING AND DESIGN**

A description of particular aspects of the proposed and existing facility is available for review in the EDWA Assessment (section 2.2.3). Please see that document for information concerning **Distance Offshore, Solar Orientation, Vertical Profile, Size and Surface Coverage, Colors, Materials, and Form** as presented by the proponents of this project. Below are additional comments concerning the above mentioned aspects of the facility that warrant consideration:

**Distance Offshore** Application of the ASSESSMENT TOOL guidelines results in ratings of **high** in 4 out of 5 of the sites assessed by APHETI, and **low** in 1 of the 5. These rating correspond to the **Distance Offshore / Observer Position** sub-category as part of the **Visibility** component.
**Vertical Profile** The mussel rafts are designed to maintain a low profile, however, the rafts currently in place at the Gallagher Cove site are highly visible in profile. Stacks of orange plastic trays, large bundles of material, piles of netting, gas or diesel powered machinery, and other miscellaneous debris and supplies sit atop the rafts and interfere with the natural landscape.

**Size and Surface Coverage.** The EDWA Assessment indicates that the overall size of the Gallagher Cove project as proposed would be 4.13 acres. It further states that the actual surface coverage would be 0.98 acres, as if that means that less than 1 acre would be encumbered by the project. On the contrary, more than the 4.13 acres would be monopolized by the structure since navigation between or near the rafts would be extremely dangerous. Long mooring lines, anchor lines, floating debris and extraneous activity near the rafts create water hazards and interfere with the public use of the waterway and access to Gallagher Cove itself.

**VISUAL ASSESSMENT**

Five separate home sites in the Gallagher Cove vicinity were assessed in the APHETI Study. As noted in the Methodology section earlier in this document, standards stipulated in the Assessment Tool guidelines were followed.

**Gallagher Cove Inventory and Evaluation Sheets**

Information from each of the 10 sheets of the Assessment Tool is summarized and scored below. The mode (most frequent) score from the data is utilized to establish an overall score for the respective sub-categories. Values for each scenic quality factor and visibility factor were then totaled to establish a scenic quality summary score and visibility summary score and corresponding rating classification. (Each homestite's scores for each component is noted separately and recorded in attachment 13.)

**Sheet No. 1**
-- **Component:** Scenic Quality
-- **Sub-category:** Environmental Condition
-- **Description:** Capacity of the landscape to accept human alteration without losing its natural visual character.
-- **Category:** Moderate (0 value)
Sheet No. 2
-- **Component:** Scenic Quality
-- **Sub-category:** Spatial Definition
-- **Description:** Degree of spatial enclosure and volume created by the flat plane of the water body and the surrounding land forms.
-- **Category:** Moderate (0 value)

Sheet No. 3
-- **Component:** Scenic Quality
-- **Sub-category:** Adjacent Scenery
-- **Description:** Adjacent Shoreline edge, land form, and vegetation which define embayment. Influence, detail, and clarity diminish with distance. In general, impact of this variable increases as the degree of enclosure increases, or as the embayment size or the distance to the opposite shore decreases.
-- **Category:** High (1 value)

Sheet No. 4
-- **Component:** Scenic Quality Summary
-- **Description:** Evaluation of individual scenic quality factors (from sheets 1-3, above) to determine overall site scenic quality.
-- **Category:** Moderate (1 value)

note: Summary Scores are based on cumulative effect. Classification rating scales are as follow:

High = 2 or 3 points
Medium = -1,0 or 1 points
Low = -3 or -2 points

Sheet No. 5
-- **Component:** Sensitivity Level
-- **Description:** Number of potential viewers, related to adjacent travel routes, use areas, or existing residential development.
-- **Category:** High (note: There is no point value attached to Sensitivity Level)

Sheet No. 6
-- **Component:** Visibility
-- **Sub-category:** View Obstruction
-- **Description:** Degree of obstruction in viewing the water by vegetation, land form, or manmade objects.
-- **Category:** High (1 value)
Sheet No. 7
-- Component: Visibility
-- Sub-category: Distance Offshore / Observer Position
-- Description: Visibility critically related to distance offshore and height of key observation points above sea level. Influence, detail, clarity, and scale diminishes as distance offshore increases. Foreshortening and scale diminishes the nearer the observer position is to sea level.
-- Category: High (1 value)

Sheet No. 8
-- Component: Visibility
-- Sub-category: Viewshed Coverage
-- Description: Percentage of normal cone of vision occupied by proposed aquaculture facility. Requires project sets and photographs taken with normal lens (50 mm), or computer simulations. In general, applies to projects located less than 1500 to 2000 feet offshore.
-- Category: Moderate (0 value)

Sheet No. 9
-- Component: Visibility Summary
-- Description: Evaluation of individual visibility factors (from sheets 6-8, above) to determine overall visibility.
-- Category: High (2 value)

Sheet No. 10
-- Description: Determination of four levels of visual impact (severe, high, moderate, low) through the synthesis of scenic quality, sensitivity level, and visibility.
-- Category: Class II - High Visual Impact

CONCLUSION

Using the rating sheets and methodology outlined in the Assessment Tool, and having gathered data by assessing 5 different sites, it has been shown that the existing project at Gallagher Cove has a HIGH VISUAL IMPACT. Expansion of this site would certainly increase the adverse impact by its cumulative effect. As acknowledged in the EDWA Assessment, the mussel rafts would be permanently visible and visibly evident from both key observation points at Mirimichi Beach and from the shoreline along the Boston Harbor Waterfront area. Due to the fact that the rafts are situated in a concave embayment, viewers’ attention tends to be drawn to the flat plane of the water. The varied texture of the scenery in the background (trees, cliffs, hills, snowcapped mountains) tends to frame and focus views and heighten the viewers’ attention. As stated in the Assessment Tool: “... aquaculture facilities located in these areas will have a higher potential for visual impact”.

Viewer concern for scenic quality is very high as evidenced by the public outcry against expansion of this industrial site. Full-time and seasonal residents live in the immediate vicinity and pay high taxes for the privilege of being in close proximity to the natural environment. Families have owned and utilized summer homes for generations, never expecting their dreams to be shattered by a large scale commercial enterprise. To typify the facility as "...subordinate to the Project setting" is ludicrous! The existing facility and adjacent service area already dominate the setting; doubling the size would completely violate the rights of the residents to experience the beauty and peace of the waters.

**NORTH TOTTEN SITE INVENTORY AND ANALYSIS**

**LANDSCAPE SETTING**

*Environmental Conditions* The North Totten proposed mussel raft site is within the view shed of homes from the northern end of the Olympic View Community to homes and homesites north of 5th St. At least 25 to 30 homes are impacted by the potential placement of the rafts. The area is rural and free of excessive noise and visual pollution at this time.

*Spatial Definition* Totten Inlet is an embayment of varying widths in its northern waters. Ranging from approximately one half mile across at Windy Point to approximately one and one half mile across if measured from the proposed North Totten site toward Kamilchi Point, the inlets affords an interesting variety of shoreline features including but not limited to shorelines of 15 to 85 feet in height on both sides of the inlet, small coves and harbors along the shoreline and sand spits and expansive tidelands exposed at low tides.

*Adjacent Scenery* Residents to the south of the site enjoy views of The Olympic Mountains, Windy Point and Steamboat Island as a backdrop to the water, while people north of the site see The Black Hills, Mirimichi Beach, Kamilchi Point and the entrance to Little Skookum Inlet in the background of their views (see attachments 8 and 12). 10.45 acres of rafts (EDWA Assessment p.23) placed in the proposed location would be directly in line with typical viewing corridors and would negatively impact the aesthetic appeal of the viewing experience.

*Bank Height* The homes adjacent to the proposed raft site are located along the shoreline and range from about 15 to 70 feet above the shoreline or base of the bulkhead, not 15 to 40 feet as stated in the EDWA Assessment (p.21) Homes on the opposite side of the inlet are located from approximately 15 to 100 feet above the shoreline. The bank height is significant as it directly relates to the visibility impact of the rafts.
**THE VIEWER**

*Viewer Expectations*  "Viewers at this location are used to open waters that are generally unobstructed by permanent man-made water features. Therefore, it can be assumed that, in general, viewer expectations at the proposed North Totten mussel raft site can be categorized as highly sensitive to view modifications".(EDWA Assessment p.21)

This is true and is also an understatement of tremendous magnitude! Never in their wildest nightmares did the residents suspect that a visual obstruction such as these proposed rafts would someday interfere with the most magnificent visual treasure that has attracted and committed each resident, young and old, to the shores of North Totten Inlet! The sky’s colors reflecting off the water, the moonbeam reaching across from opposite shores, the currents forming patterns that ripple and ride with the rhythm of the natural ebb and flow of the tide changes, rough seas building as weather approaches from the southwest and expressing its power as whitecaps in the wild seas; these are viewer expectations! The viewer expects to see the effect of the open sea interacting with other natural elements, not interfered with and interrupted by a conglomeration of corporate clutter!

*Number of Viewers* The areas adjacent to the proposed raft site is “built out” almost at the maximum limit allowed by county zoning laws. A few building sites remain uninhabited, but it is just a matter of a short time until owners will proceed with long held plans to build on their land. The number of residents still will not be huge, but the detrimental impact on the quality of life they experience will be immense if the rafts are placed in their view. High taxes paid for the privilege of watching sunsets, moonbeams and shimmering waters will be wasted if those experiences become mere memories. The obstructed view would be a constant reminder of what once was, but then was taken from them by big business and bureaucracy.

The number of viewers that would be adversely impacted by this project day after day for years to come compared to the few who would benefit financially should be enough to rule in favor of residents’ aesthetic rights. Who is to say that the few employees who would hold the seasonal jobs and the administrators and managers of Taylor Resources Inc. are more deserving of pursuing their financial goals than the residents are of pursuing their own lifestyle goals? Residents have built their homes and dreams here and have been following county and state laws by paying taxes and obeying health and sanitation codes to protect them. Why is it justifiable for a nonessential commercial enterprise to take these dreams away? The population might not be huge, but the travesty of justice would be immeasurable.

*View Duration* Since each of the homes in the vicinity of the North Totten site is a permanent residence, sustained views of the project is a certainty. In addition, most of the homeowners along the water have one or more specific viewpoints in their yard to take full advantage of the views that their properties afford them.
FACILITY SITING AND DESIGN

Distance Offshore  According to the EDWA Assessment, the mussel rafts would start at approximately 600 feet from the adjacent shoreline and extend waterward about another 600 feet. However, this is difficult to ascertain since only 3 buoys can be located to mark the site and and the accuracy of existing buoys is suspect. Views of the proposed rafts would be from approximately 15 to 50 feet above the shoreline from residences within 1000 feet of the site and 60 to 70 feet above the shoreline from houses within 1000 to 2000 feet of the proposed site, thus increasing the visual impact of the rafts.

Solar Orientation  From the adjacent residences to the south, views of the site are generally north to northwest. Homes that are north of the proposed site enjoy an expansive view in the southwestern direction (see attachment 8).

Vertical Profile  The EDWA Assessment reports: "The mussel rafts would generally rise between one and two feet above the surface of the water and would have a low profile with the water surface" (p. 23). As pointed out earlier in the Gallagher Cove Inventory and analysis, existing mussel rafts at that site are anything but "low profile". Machinery, tools supplies, natural debris, tarps, hose, lumber, etc. clutter the rafts and raise their profile visibility. Even the rafts that aren’t cluttered with articles of various kinds are poorly constructed and float in an awkward and uneven manner. High profile is a better descriptor.

Size and Surface Coverage  Although the EDWA Assessment states that the 58 rafts would be spread out over 10.45 acres, the point is also made that if there were no space between the rafts they would fit in an area of 1.45 acres (p.23). The fact is that if the industrial site is 10.45 acres, the monopolized surface area is at least that great, since mooring lines, anchor lines, related vessels and activities would create hazards if boaters, swimmers, skiers or float planes etc. were to navigate nearby.

VISUAL ASSESSMENT

5 separate home sites in the proposed North Totten site vicinity were assessed in the APHETI Study. As noted in the Methodology section earlier in this document, standards stipulated in the Assessment Tool guidelines were followed.

North Totten Inventory and Evaluation Sheets

Information from each of the 10 sheets of the Assessment Tool is summarized and scored below. Each homesite’s scores for each category is noted separately and recorded in attachment 13. The mode score from the data is utilized to establish an overall score for the respective sub-categories. Values for each scenic quality factor and visibility factor were then totaled to establish a scenic quality summary score and visibility summary score and corresponding classification rating.
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-- **Category:** High (3 value)

Sheet No. 10

-- **Description:** Determination of four levels of visual impact (severe, high, moderate, low) through the synthesis of scenic quality, sensitivity level, and visibility.
-- **Category:** Class II - High Visual Impact
CONCLUSION
Using the rating sheets and methodology outlined in the Assessment Tool, and having gathered data by assessing 5 different homesites adjacent to the proposed North Totten mussel project site, it has been shown by The APHETI Assessment that the proposed project would have a **HIGH VISUAL IMPACT** if it were approved. The EDWA Assessment, submitted by the proponents of the project, found the visual impact to be "...moderate to high..." (p.26). It states: "The mussel rafts would be permanently visible and visibly evident from the key observation point, as well as from several residences on either side of the key observation point". The report went on to explain the technical process it followed to create a simulation of the rafts in front of the site evaluated in the EDWA Assessment and acknowledged: "These simulations show that the rafts would cause a visual obstruction to a view that is otherwise relatively free of other permanent man-made water features" (see p.26 paragraphs 2, 3 and 4 of the conclusion of the EDWA Assessment). The APHETI Assessment also includes visual representations of the proposed raft placement.

The APHETI Assessment arrived at a similar conclusion. A key discrepancy however, between the two conclusions, is that, according to the EDWA Assessment, the **Viewer Sensitivity** was determined to be moderate due to the "...low number of viewers..." and that the Project would likely have a moderate visual impact on the area's visual resources.

How convenient! The EDWA Assessment conducted a study of 1 site; the APHETI Assessment evaluated 5 sites. As stated earlier in this document, the number of viewers and the respective sensitivity score is highly subjective in that value is being placed on commercial interests over private citizen concerns. Objectivity appears to have no place in this aspect of the assessment since if the actual count of tangible beneficiaries of either decision were computed, the residents, family, friends, and members of the public who use and enjoy the waters of Totten Inlet in various ways would surely outnumber the few employees of Taylor Resources Inc. that would stand to gain from the enterprise. Public consumption of mussels as a subsistence product is not a realistic argument if a case were to be attempted for feeding the masses. Restaurants don't feed the masses.

The County's Shoreline Master Program (1990) states: "Shorelines of this region which are notable for their aesthetic, scenic, historic or ecological qualities shall be preserved. Any private or public development which would degrade such shoreline qualities shall be discouraged".

Therefore, since the determination has been made that the Sensitivity Level warrants a rating of **High**, the overall rating stands as **Class II - High Visual Impact**. The implications that follow with this classification are that the facility is proposed for "Areas where permanently visible aquaculture facilities will likely be visually intrusive. To mitigate impact, project scale should be small enough not to call attention to itself or be located so not to be visually evident from key viewing points." (Assessment Tool)
NAVIGATION

The waters of Totten Inlet are enjoyed by boaters of all sorts from all around Puget Sound. As a lower Puget Sound destination point, boaters travel from the northern waters to see what the southern reaches of the sound is like. Already unfamiliar with the area, many navigators encounter trouble if venturing too close to shore at high tide or too far into an inlet at mid to low tide.

Even local citizens experience trouble in familiar waters. Sailors and windsurfers are not always able to navigate successfully past obstacles in the water. Power boats of all sizes are commonly captained by less than expert skippers. Add the likelihood of poor weather conditions such as heavy fog, rain and wind, the dark of night or the glare of the sun on the water and the chances of a disastrous accident is increased. Intentionally placing a ten acre formation of rafts, as would be at the North Totten site, or four acres of rafts at the entrance to Gallagher Cove, would result in not just a visual intrusion but a dangerous obstacle of enormous magnitude. Water skiers and power boaters who like to speed across the water may be annoying to some, but their right to use the water for recreation is protected by Public Use laws. They do not deserve to encounter man made hazards in otherwise open waters that could prove deadly if hit at high speeds.

The proposed locations for both sets of rafts would create narrow strips of navigable water at low tide, most dramatically at Gallagher Cove and along the eastern shores of North Totten Inlet. This would sorely interfere with the ability of residents to access the water from their land or the bring a boat to their shores, jeopardizing their rights as citizens and landowners.

The Gallagher Cove site would begin approximately 500 feet from the southeast shore and extend seaward another 500 feet (Attachment 2). The access site for these projects is adjacent to this site and typically has two to six barges and other vessels and mooring stations in the vicinity, all adding to the congestion of the area and monopolizing the waters.

The North Totten site would begin approximately 600 feet from the shoreline and extend an additional 650 feet seaward. With seventeen vertical pilings also in the vicinity 150 feet from the proposed project site, a 1250 foot barrier to navigation is effectively created.

Permitting these projects to go forward would represent a gross violation of the public’s right to use the waters and would create obvious hazards to navigation. The risks and loss of rights for the citizens are far too great to allow this commercial activity to proceed.
Summary

The visual impact of the proposed project is of great concern to the people living in the community and the public that visit the area by land or sea. Sunsets over Totten Inlet are a sight to behold. Light and colors reflect off the water in a manner that defies description. Moonbeams reach across the bay from the opposite side forming rivers of light that ripple and run with the current. An array of industrial rafts would sorely interfere with these natural phenomena and undermine the goals and dreams of the people who built their homes in appreciation of the beauty of the area.

Environmental concerns also arise from the proposed project. Aside from noise, lighting and debris that would come from the rafts themselves, accessing and working the project creates problems for nearby residents. The land based staging area which currently serves as the access point of the Gallagher Cove project, is heavily used for constructing rafts, loading and unloading barges, and equipment launching and maintenance. Neighbors are impacted by the noise of workers and machinery, the unsightly litter and debris, and the foul smell when rafts and nets are being cleaned. All of this is taking place in an area that the Shoreline Master Program has determined to be a conservancy environment which, according to the Master Program, is not to be used as an industrial site. If this location were also used to access the proposed North Totten Site, the cumulative effect would be devastating to the neighborhood and the environment.

Public use of our waters is given equal priority to that of aquaculture under The Shoreline Management Act. Such public rights have been upheld by case law as part of the Public Trust Doctrine. Both the Gallagher Cove and the North Totten sites are popular recreation areas for neighbors and local citizens, but large conglomerates of rafts with mooring lines and related floating vessels would greatly limit and impede navigation and water uses of several types. Swimming, fishing, water skiing, wind surfing, sailing, canoeing, kayaking, and power boating; these are all popular and appropriate uses of the public waters by the people of the area. Acres and acres of floating obstruction would not only interfere with our right to participate in these activities, but would jeopardize our safety if we attempted to do so.

We urge Thurston County officials to adequately represent the concerns of the voting and taxpaying public, and deny the permitting of expansion of the Gallagher Cove mussel site and the establishing of an additional mussel site in North Totten Inlet.
# SITE HEIGHT AND DISTANCES

**Gallagher Cove**

<table>
<thead>
<tr>
<th>Attachment number</th>
<th>Site</th>
<th>Bank Height</th>
<th>Distance From Project</th>
</tr>
</thead>
<tbody>
<tr>
<td>3</td>
<td>G1</td>
<td>25 FT.</td>
<td>1800 FT.</td>
</tr>
<tr>
<td>4</td>
<td>G2</td>
<td>40 FT.</td>
<td>500 FT.</td>
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<tr>
<td>5</td>
<td>G3</td>
<td>40 FT.</td>
<td>550 FT.</td>
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<td>6</td>
<td>G4</td>
<td>90 FT.</td>
<td>1500 FT.</td>
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<tr>
<td>7</td>
<td>G5</td>
<td>15 FT.</td>
<td>1800 FT.</td>
</tr>
</tbody>
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**North Totten**

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<tr>
<td>8</td>
<td>N1</td>
<td>40 FT.</td>
<td>700 FT.</td>
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<tr>
<td>9</td>
<td>N2</td>
<td>30 FT.</td>
<td>650 FT.</td>
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<tr>
<td>10</td>
<td>N3</td>
<td>65 FT.</td>
<td>650 FT.</td>
</tr>
<tr>
<td>11</td>
<td>N4</td>
<td>70 FT.</td>
<td>1100 FT.</td>
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<tr>
<td>12</td>
<td>N5</td>
<td>75 FT.</td>
<td>1200 FT.</td>
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</table>
## SITE INVENTORY

### Gallagher Cove

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<tr>
<th>Scenic Quality</th>
<th>SITES</th>
<th>Mode Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>Environmental Conditions</td>
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<tr>
<td>Spatial Definition</td>
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<tr>
<td>Adjacent Scenery</td>
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</tr>
<tr>
<td>Scenic Quality Summary</td>
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<td>1 Moderate</td>
</tr>
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</table>

#### Sensitivity Level
- high  high  high  high  high  high  High

#### Visibility
- View Obstruction 0 0 1 1 1 1 1
- Distance Offshore/Observer Position 1 1 1 1 -1 1
- Viewshed Coverage 1 0 1 0 0 0
- Visibility Summary 2 1 3 2 0 2 High

#### Overall Classifications
- III  II  II  III  II  II  II

### North Totten

<table>
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<tr>
<th>Scenic Quality</th>
<th>SITES</th>
<th>Mode Score</th>
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<tbody>
<tr>
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<td>Adjacent Scenery</td>
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<tr>
<td>Scenic Quality Summary</td>
<td>1 0 0 0 0 0 0 0</td>
<td>0 Moderate</td>
</tr>
</tbody>
</table>

#### Sensitivity Level
- high  high  high  high  high  high  High

#### Visibility
- View Obstruction 1 1 1 1 1 1 1
- Distance Offshore/Observer Position 1 1 1 0 0 1
- Viewshed Coverage 1 1 1 1 1 1
- Visibility Summary 3 3 3 2 2 3 High

#### Overall Classifications
- II  II  II  II  II  II  II