

**Cami Petersen - Project # 961372 SSDP, Applicant Taylor Shellfish Company**

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**From:** seablues Puddicombe <seablues@msn.com>  
**To:** <peterscs@co.thurston.wa.us>  
**Date:** 02/07/2012 11:35 PM  
**Subject:** Project # 961372 SSDP, Applicant Taylor Shellfish Company

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## THURSTON COUNTY HEARING EXAMINER

Thurston County Courthouse  
Building No.1, Room 152  
2000 Lakeridge Drive SW  
Olympia, Washington 98502

Re: Project # 961372 SSDP, Applicant Taylor Shellfish Company

Dear Sir or Madam:

I appreciate the length to which Thurston County has gone to in addressing these mussel rafts. Most of the intensive aquaculture practices like mussel rafts from around the world are in coastal embayments like Hiroshima Bay in Japan or Rias Biexas in Spain or Willapa Bay, and not in closed inlets like Totten Inlet or other areas of Puget Sound, so an EIS was very appropriate for this proposal.

The Staff Report does not mention the inevitable plastic pollution that will be generated by the proposed new rafts. Plastic mesh "socks", plastic mussel discs and other plastic debris from shellfish aquaculture in Totten Inlet routinely wash up on private and public beaches as far away as North Bay in Case Inlet and as far south as the Narrows and beyond. This proposal for additional mussel rafts will contribute to more plastic debris and pollution in Totten Inlet and elsewhere in Puget Sound.

No studies have been conducted to quantify plastic pollution from aquaculture as mandated by HB 2220, nor have any studies been conducted to determine the harm to wildlife in Puget Sound. We know from studies in other ecosystems that plastic pollution does harm wildlife. So there's a failure here to address the plastic debris/pollution issue/problem.

The report also doesn't discuss how mussel rafts provide a platform for tunicates and other invasive fouling organisms. This is a well known problem that appears to be getting worse.

The other issue is the term "**substantial**". As we learned from the Maury Island case, US District Court Judge Ricardo Martinez wrote: "**Which raindrop caused the flood? No single project or human activity has caused depletion of the salmon runs or the near extinction of southern resident Orca, or the general degradation of the marine environment of Puget Sound. Yet every project has the potential to incrementally increase the burden upon the species and the Sound.**"

[http://seattletimes.nwsourc.com/html/localnews/2009658825\\_mauryisland14m.html](http://seattletimes.nwsourc.com/html/localnews/2009658825_mauryisland14m.html)

So this bothers me when we simply say that the adverse impacts are not "**substantial**". Especially given the fact that both the New Fields Assessment and the MEC Weston Solutions Assessment both agree that there are adverse impacts, and especially when the SMA Guidelines call for "**no net loss**".

But admittedly, the impacts according to these two assessments are small. But the SMA doesn't say a

small net loss is acceptable, it says NO net loss. It's important to consider that the assessments do not include the adverse impacts of all the other shellfish operations in Totten Inlet combined. When taken in this context, additional operations can be significant.

The New Fields Assessment discusses low dissolved oxygen at the Windy Point and North Totten Inlet rafts to assess what might be the case with the new additional rafts. Both sites exhibited significant reductions in dissolved oxygen below the rafts, and this persisted from 70 to 200 meters (230 to 656 feet) down current of the rafts. This is especially a problem in the summer months when Totten Inlet normally has problems with low dissolved oxygen. The mussel rafts will make it worse, and could create dead zones for fish migrating through the area in the summer. If these new rafts are approved, dissolved oxygen levels should be monitored during the summer.

So while the phytoplankton/zooplankton depletion appears to be minimal according to the assessments, the dissolved oxygen issue could be a problem, and there should be some monitoring in these areas in the summer if approving these additional rafts. And it is always important to remember that **the New Fields Assessment does not take into account the totality of the other mussel rafts and all the other shellfish aquaculture in Totten Inlet.** The Staff Report mentions the fact that the mussel rafts are next to tidelands owned by Taylor that are already in commercial shellfish production, yet the impacts of this are not added to the New Fields assessment, yet we know that these affects are cumulative and additive.

The MEC Weston Solutions Assessment predicts a reduction in standing stock in Totten Inlet of zooplankton (.016%), juvenile salmon (.0016%) and forage fish (.0021%), and as noted, these are really small; arguably insignificant reductions.

But, the nice thing about this assessment is, it tells us unequivocally that shellfish aquaculture does result in the loss of salmon and forage fish abundance, and it predicts a quantity, even if it's small. And again, as with the New Fields Assessment, it is notable that **these small reductions in MEC Weston assessment do not take into account the other mussel rafts and all the other shellfish aquaculture in Totten Inlet. When taken in totality, there is a higher probability of likely and significant reductions in salmon and forage fish,** and therefore the rafts may violate the SMA, the ESA, the MSA and the Clean Water Act.

New Fields Assessment:

<http://www.caseinlet.org/uploads/Mussel--Taylor EIS-Water Column study Oct 08 1 .pdf>

MEC Weston Assessment:

[http://www.co.thurston.wa.us/permitting/devactivity/totten/itrc-process/6M%20MEC-WatersAndAssociatedBiotaImpacts\\_Oct04.pdf](http://www.co.thurston.wa.us/permitting/devactivity/totten/itrc-process/6M%20MEC-WatersAndAssociatedBiotaImpacts_Oct04.pdf)

There is also some anecdotal evidence that forage fish populations have crashed in areas of dense shellfish aquaculture in Totten Inlet. As is documented, forage fish, specifically sand lance, are an important food source for salmon and flat fish.

If additional mussel rafts and shellfish aquaculture are going to continue to be permitted in Totten Inlet, a cumulative impact analysis that considers the totality of all shellfish aquaculture in Totten Inlet must be done rather than just one project at a time. Totten Inlet needs to be viewed as connected together, and one can't simply keep taking an assessment on one project in one area without beginning to look at the whole picture and taking into consideration the fact that fish migrate regularly throughout the entire area of Totten Inlet.

The key issue for me is the fact that the assessments acknowledge adverse impacts that appear to be

small, yet they do not consider the accumulation of impacts from the other mussel rafts and all the other shellfish aquaculture in Totten Inlet as I have reiterated. If the new mussel raft proposal is going to reduce fisheries resources by a small amount, then what is the reduction of fisheries resources **IN TOTAL** from all the existing operations? What is the net loss? Obviously there is a net loss if you agree with the assessments. If this one project isn't significant, then examine the significance of all the existing and proposed operations in sum together.

The SMA says:

**“The overarching policy is that 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”.**

*Overarching* means overriding, overruling, encompassing and overshadowing everything. It means predominate and paramount. It means that everything else in the Shoreline Management Act, including aquaculture, is under the umbrella of this one singular idea. The SMA also very clearly gives priority to single family residences and shoreline recreational uses over aquaculture as a preferred use.

The Shoreline Management Act also states:

“Alterations of the natural conditions of the shorelines of the state, in those limited instances when authorized, shall be given priority for...development that will provide an opportunity for substantial numbers of people to enjoy the shorelines of the state.”

This statement clearly indicates that shoreline alterations will be (1), limited in instance, and (2), prioritized toward recreational uses. In Totten Inlet, with about 91% shellfish aquaculture and growing, how are these alterations being *limited in instance*?

The mussel raft proposal is inconsistent with the SMA in the following ways:

1. It does not preserve the natural character of the shoreline.
2. It does not protect the resources and ecology of the shoreline.
3. It decreases recreational opportunities for the public in the shoreline area (fishing, boating).
4. The public’s opportunity to enjoy the physical and aesthetic qualities of natural shorelines is not being preserved.
5. It is an alteration of the natural condition of the shoreline.
6. It is contrary to the state’s policy of “protecting against adverse effects to the waters of the state and their aquatic life”.
7. It is not a preferred use consistent with prevention of damage to the environment.
8. It does not meet the “*no net loss of ecosystem function*” criterion (see standing stock loss of forage fish and salmon per MEC Weston Assessment and significant reduction in dissolved oxygen per New Fields Assessment).
9. It does not meet the SMA guidelines of being consistent with the control of pollution (plastic debris).

I also want to mention the statements made by Joan K. Thomas (recently deceased) of the Washington Environmental Council (WEC) and one of the drafters of the SMA because it reflects how many citizens feel. Thomas spoke on the history of the act (page 16) at the [1991 SMA Symposium](#).

<http://nsgl.gso.uri.edu/washu/washuw91002.pdf>

The WEC, along with citizen and environmental groups, were instrumental in the passage of the SMA, and in getting the SMA on the ballot. In 1970, these groups had gathered over 160,000 signatures in 10 weeks. The earlier versions of the act also provided for direct citizen enforcement.

Joan K. Thomas at the 1991 symposium stated:

*“I have thought about this carefully over the years as I have seen my expectations frustrated. We have lost the full potential of the SMA to protect a valuable resource through fainthearted administration.”*

*“When the SMA was written in 1971, aquaculture meant oysters and clams and one salmon raising operation. This activity was recognized and protected as water-dependent. I do not read the original intent or the original guidelines to promote the industry as we know it today. In fact, the guidelines specified that navigational access not be restricted and that visual access of upland owners be considered. Aquaculture has become a sore point between local governments and the Department of Ecology – a fraying of the partnership.”*

This was in 1991, yet it has gotten so much worse since then.

In addition to Thomas, please consider our dwindling fisheries resources in rendering your decision.

Thank you for considering my comments.

Regards,

Curt Puddicombe  
Vice President  
Case Inlet Shoreline Association  
PO Box 228  
Vaughn, WA 98394  
[www.caseinlet.org](http://www.caseinlet.org)  
[seablues@msn.com](mailto:seablues@msn.com)  
206-730-0288

**Cami Petersen - Totten Inlet Mussel Farm**

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**From:** bev <bevdon@aol.com>  
**To:** <peterscs@co.thurston.wa.us>  
**Date:** 02/08/2012 7:47 AM  
**Subject:** Totten Inlet Mussel Farm

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TO: Cami Peterson

I was asked to write to you regarding the proposed mussel farm. I also live on Puget Sound but not in the area under question. I am not going to give you the typical objections, I am sure you are well aware of those. What I will do is ask you to spend some time in the area..... not just a boat ride tour but actually sit on the beach and watch what is going on around you. A couple of years ago I did this very thing in the area where these mussel farms exist. It was very sad to see that the normal animal life was totally changed. Birds that used to live in the area were gone, the otters were gone. The normal vegetation was compromised. Is this what we want for Puget Sound? for our grandchildren? It doesn't change over night but it does change. Please consider the impact.

Thank You  
Bev Smith

**From:** Deborah Petersen <debandchico@comcast.net>  
**To:** <peterscs@co.thurston.wa.us>  
**Date:** 02/06/2012 4:24  
**Subject:** Taylor shellfish (mussel farm) proposal

> Dear Thurston County Planning Office and Hearings Examiner:

> I am writing in regards to the Taylor Shellfish mussel farm proposal  
> for Totten Inlet. I live at Carlyon Beach and regularly walk the  
> beaches of Totten Inlet, Hope Island etc. I am constantly picking up  
> the plastic trash (garbage like the geoduck tubes and tube nets,  
> oyster bags, etc) from the Taylor Shellfish operations in Totten  
> Inlet that dislodge and float around the Sound, harming or killing  
> wildlife and trashing the beaches. I am opposed to the rapidly  
> growing shellfish farms that are creating a monoculture that  
> destroys the intricate diversity of the sensitive intertidal zone,  
> decimating the benthic organisms, eliminating eelgrass, polluting  
> Puget Sound with plastics and chemicals that kill and harm  
> wildlife, and fouling the beauty of the beaches and the water.

> If this was truly a local, sustainable business, I may feel  
> differently. But Taylor Shellfish impacts can be seen all over Puget  
> sound, not just Totten Inlet.  
> Taylor Shellfish is simply using up or negatively impacting too much  
> of the Puget Sounds resources for its profit only. Much (if not  
> most) of Taylor's shellfish gets shipped overseas to China and Japan  
> and the only people profiting from this venture is Taylor Shellfish.  
> Their profit comes at too high of a cost to Puget Sound. Enough is  
> enough.

> I recently helped secure a Taylor Shellfish boat that had drifted  
> away from moorage during the snow/ice storm. This boat landed  
> against the Steamboat Island bridge. I went aboard to tie it off to  
> the bridge and noticed how much trash was left on board that would  
> easily slide off the boat or get blown off by wind into the Sound.  
> My sense was that this boat operator did not care about stewarding  
> Puget Sound, only about making money from harvesting shellfish.  
>  
> Please consider the vast majority of us who live here, value the  
> Sound, and depend on it for sustenance and quality of life. Puget  
> Sound is a public resource, and the County has an obligation to  
> protect that resource.

> Please do not approve this mussel farm. Puget Sound is in dire need  
> of actions that clean up the Sound. Yes, shellfish are good  
> filterers of the water and Taylor cleverly uses this as a way to  
> convince the public that their business is a "green" business. But  
> it isn't. It is about profit. The growing number of shellfish farms  
> is a problem not a solution to helping Puget Sound!

>  
> Thank you for your consideration of my concerns.  
>  
> Deborah Petersen, Homeowner at Carlyon Beach  
> 2532 Island Dr NW  
> Olympia, WA 98502

**From:** peggy bruton <gimleteye@comcast.net>  
**To:** <peterscs@co.thurston.wa.us>  
**Date:** 02/07/2012 11:03  
**Subject:** Project # 961372 SSDP, Applicant Taylor Shellfish Company

Ms. Peterson: I believe the marine environment in Totten Inlet would be harmed by the addition of the 58 mussel rafts proposed for this project. The species to be cultivated is not native to this area, and the proliferation of mussel rafts and geoduck farms threatens many native species. The south sound should not be sacrificed to this industry. While a reasonable amount of shellfish farming is tolerable, I believe we have already crossed this threshold in Totten and portions of Eld Inlet. Intensive fish farming has wrought havoc on coastal areas of northern Scotland and Scandinavia. We should learn from that experience and be very cautious about permitting more shellfish farming here.

Thank you for your consideration.

Peggy Bruton  
gimleteye@comcast.net

1607 East Bay Drive, Olympia 98506

(I own property near Hunter Point, on the Eld side of the Peninsula, where shellfish farming is compromising environmental quality.)

**Cami Petersen - Project # 961372 SSDP, Applicant Taylor Shellfish Company**

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**From:** Gail Sheikhezadeh <gailsheik@gmail.com>  
**To:** <peterscs@co.thurston.wa.us>  
**Date:** 02/07/2012 11:22 PM  
**Subject:** Project # 961372 SSDP, Applicant Taylor Shellfish Company

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Dear Cami,

I am opposed to the mussel raft farm proposed for Totten Inlet. A shameful disgrace to the Great Northwest. Please uphold our unique, beautiful part of the world by refusing even more of these mussel rafts. Enough is enough. If you have been by one of the established mussel rafts and experienced the odor (sorry, but they really do smell like vomit) and read up on the negative effects on the native habitat than you will certainly see that it is not what we should leave our children to contend with. Someone with great influence is getting away with destroying our beautiful Salish Sea single-handedly. Please try to stop it.

Thank you.  
Gail Sheikhezadeh  
360-888-2000

## Cami Petersen - Opposed to Application by Taylor Shellfish Company - Project #961372 SSDP

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**From:** Pat Rasmussen <patr@crcwnet.com>  
**To:** <peterscs@co.thurston.wa.us>  
**Date:** 02/08/2012 9:42 AM  
**Subject:** Opposed to Application by Taylor Shellfish Company - Project #961372 SSDP  
**CC:** pat rasmussen <patr@crcwnet.com>

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Dear Ms. Petersen,

I am opposed to mussel raft farms in Totten Inlet proposed within a Conservancy Shoreline Environment as designated by the Shoreline Master Program for the Thurston Region.

The mussel species is *Mytilus edulis galloprovincialis* is not native to Puget Sound and is potentially invasive. Taylor Shellfish Co. (Taylor) currently operates two floating mussel raft aquaculture facilities of 69 rafts at Deep Water Pt. and Gallagher Cove in Totten Inlet. Taylor proposes to add a third facility of 58 more rafts in 11.25 acres of the sub-tidal zone just off the east shore of Totten Inlet. With the proposed expansion, there would be a total of 127 mussel rafts in Totten Inlet. Each raft is 30 X 34 feet in size (about the size of a small family house) and may generate an average of 20,183 lbs of mussels per growing period (16 months). The 127 rafts may produce a combined 2,563,241 lbs of mussels every 16 months. These are big industrial operations and bring collateral human impacts in the forms of noise, noxious odors, destruction of views, impacts to free public navigation, and reduced personal real estate values.

Problems exist from farms already there:

- \*\* invasive tunicates are already found from existing mussel rafts in Totten inlet and these will multiply
- \*\* fish and wildlife are already disappearing from Totten Inlet due to the amount of shellfish farming currently being done
- \*\* the natural environment should be protected rather than harmed
- \*\* known negative effects on forage fish
- \*\* displacement of our native mussels through colonization and hybridization.

Critical environmental concerns of this proposal include Carrying Capacity (availability of micro-food organisms) of Totten Inlet to support all native marine life, i.e. bait fish and juvenile salmon; Flushing Capacity to disperse the mussels biological waste (up to 5% of body mass or about 64 tons every 16 months); Water Quality (circulation, excess nutrients, dissolved oxygen); and the potential of these non-native mussels to displace native mussels through colonization and hybridization.

The risk to threatened and endangered salmon is unacceptable. The people of Washington state are paying millions of dollars to restore salmon and do not want to increase threats to salmon.

**Local citizens have personally seen how the marine ecology of Totten Inlet has been harmed since large scale commercial aquaculture has come to dominate the Inlet and feel the Inlet should be preserved for the free and quiet enjoyment of the public at large rather than be destructively exploited for the private profit of one industry.**

Current industrial mussel farms must be removed to restore the South Sound, not increased.

Pat

--

Pat Rasmussen

World Temperate Rainforest Network

PO Box 13273

Olympia, WA 98508

509-669-1549

[www.temperaterainforest.org](http://www.temperaterainforest.org)

**Cami Petersen - Commet: Project # 961372 SSDP, Applicant Taylor Shellfish Company**

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**From:** robert ahlschwede <swedeberger@gmail.com>  
**To:** <peterscs@co.thurston.wa.us>  
**Date:** 02/08/2012 10:24 AM  
**Subject:** Commet: Project # 961372 SSDP, Applicant Taylor Shellfish Company

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Adding my comments on the proposed mussel rafts in Totten Inlet. We cannot allow the whole of South Sound to be turned over to industrial development. I urge the denial of this application.

Rob Ahlschwede

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Rob Ahlschwede  
3726 Wesley Loop NW  
Olympia, Washington 98502  
360-866-1935

Law Offices of

**PAYNE**

**&**

**HICKEL**

A Professional Service Corporation

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Federal Way, Washington 98003

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(253) 839-1730  
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Lawyers

Gaylen B. Payne  
Timothy T. Hickel

February 7, 2012

Thurston County Hearing Examiner  
Thurston County Resource Stewardship Department  
Building 1  
2000 Lakeridge Drive SW  
Olympia, WA 98502

Project No. 961372 SSDP  
Applicant: Taylor Shellfish Company – Totten Inlet Project

Dear Hearing Examiner:

I am writing to voice my opposition to the proposed Taylor Shellfish mussel farm complex. As stated in the EIS, the EIS was limited to “biological and navigation issues.” I consider this to be a critical mistake. The impact on surrounding residential property values should have been considered.

This 58 raft complex is analogous to building a 58 home subdivision on the Sound. The EIS acknowledges that each raft is the size of a small home. This subdivision on the Sound will adversely impact the residential property values of all waterfront property owners located in the area of the project as well as all other property owners that are adversely impacted by the project. For this reason, I am requesting that the hearing examiner review the impact on existing homeowners’ property values.

In the alternative, I would request that the hearing examiner separately consider this issue before proceeding with permit approval or denial.

The proposed project is located directly offshore from numerous low bank waterfront properties. As stated in the EIS, “this mussel farm will begin at approximately 85th Ave NW and extend to approximately 90th Ave NW.” 85<sup>th</sup> Avenue NW is lined with numerous low bank waterfront properties. Additional properties extend northward to 90<sup>th</sup> Ave NW. The greater neighborhood consists of several hundred homes.

I find it appalling that the EIS did not include an evaluation of the impact on local residential property values and the potential damage to local area homeowners. It doesn’t

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take a scientific study to deduce that placing hundreds of fifty-five gallon blue barrels in front of low bank waterfront residential properties will diminish the waterfront properties' value. In addition, the EIS acknowledges that the rafts will be serviced on a daily basis by large trucks going up and down the shore and boats from water. The EIS also acknowledges that employees will be on the rafts on a daily basis and that the rafts will be lit-up at night for navigation safety.

In addition, I have visited the existing mussel raft complexes over the years and one unusual side effect is that the rafts have become makeshift seal rookeries that emit a strong odor and stench. The prevailing winds on Totten Inlet come from the southwest. This means the winds will blow across the rafts and directly toward the waterfront homes located a couple hundred feet away on the eastern shore of Totten Inlet.

In short, there will be a clear impact on property values involving continuous noise, visual nuisance, rancid smell and night lighting akin to someone shining a light through your window at night.

What waterfront property buyer is going to pay current fair market value when he arrives to preview a property and sees a 58 home subdivision of wooden rafts and hundreds of blue barrels floating in the water in front of the property and then notices constant noise and a rancid smell?

For these reasons, I would respectfully request that the hearing process be expanded to include the impact on residential property values. In addition, I would request that Taylor Shellfish Company be required to post a bond and/or create a settlement fund in order to compensate all impacted property owners as a condition of permit approval.

The other option is a class action lawsuit against Thurston County and Taylor Shellfish Company for the damage caused to hundreds of property owners because this issue was known to the parties but intentionally ignored and not subject to the EIS or permitting process. I trust that the County would rather not go down this route.

To limit the EIS only to the water itself and navigation is ridiculous. It would be analogous to permitting a pig farm in the middle of a 300 hundred home neighborhood

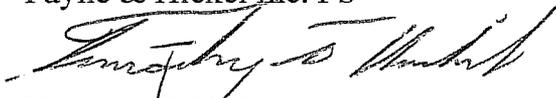
Law Offices of  
**PAYNE**  
**&**  
**HICKEL**

February 7, 2012  
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and then only studying the effect the pigs have on the dirt of the farm while ignoring the effects on the 300 neighbors surrounding the farm. This issue must be addressed.

Sincerely,

Payne & Hickel Inc. PS



Timothy T. Hickel

Cc: Governor Chris Gregoire

THURSTON COUNTY  
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FEB 08 2012

DEVELOPMENT SERVICES

19800 SW Touchmark Way #412  
Bend, Oregon 97702  
February 4, 2012

Thurston County Resource Stewardship Department  
Building # 1  
2000 Lakeridge Drive SW  
Olympia, Washington 98502

RE: Project #: 961372 SSDP

Sirs:

We are in receipt of the notice of Public Hearing for this project. The papers state that staff reports can be viewed online at:  
<http://www.co.thurston.wa.us/permitting/hearing/hearing-home.html>. We have not been able to access this site. So we send this letter.

We have owned the property at 2538 Island Drive N.W., Olympia Washington, 98502 for five generations, since 1960, when Carlyon Beach was initially developed. We are on the water-front on Squaxin Passage, facing Hope Island. We have always been guardians of the land, the water, the air, and the inhabitants within these systems. We treasure it all.

We object to to this proposal because of the impact on the land, the water, the air, but most of all for the impact on the lives on the people both nearby and the entire state.

The air will be impacted, because of noise, which is unnatural, intrusive, unwarranted, and unwanted. Please consider the reasons people choose to live in these more removed locals...peaceful and quiet coupled with water related fun activities. This should not be sacrificed for profits.

The land under the rafts will be impacted by excrement that is foreign to the sensitive and diverse ecosystem into which it invades. This should not be sacrificed for profits.

The water will be impacted. No one wants to swim near a sess pool. The tide there at 90<sup>th</sup> swoops along the shoreline, circles around the spit between the mainland and Steamboat Island, then circles back down into Totten Inlet in order to exit into Squaxin Passage. That circling will deposit excrement onto the excellent beach that provides a shallow play area for children along with a shelter (from the bridge) for those seeking shade. There were bountiful fields of sand dollars in these shallows. This should not be sacrificed for profits.

Should this project be permitted it would be a visually abhorrent blight to view from the lands on both sides of Totten Inlet, and from the water passageway by leisure boat.

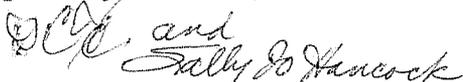
We wonder, too, about ski boats? Would they have to slow down, let the person being towed slowly sink into the cold waters as the rafts are passed, then resume speed? That would no longer be the summer time fun to circle Hope Island, cruise down Totten Inlet with the kids on their skis, inner tubes, or boards, if a cold dunking is so close by at 90<sup>th</sup>.

Quality habitat is vital to lives, and especially dear to those here in the still waters of the South Sound.

In conclusion, we vigorously object to the granting of the permit for this project # 961372 SSDP on the basis of its profound and pervasive daily negative impacts on the people, on the air, on the land, and on the water. Placement of these 58 rafts would be a negative and substantial impact to the daily lives of the many people who live in and around this area. It surely would negatively impact generations to come.

We find the proposed development to be not in the best interest of the people who live in the area, but rather in the profit turning interests of the applicant.

Respectfully submitted,

  
The Hancock Family Trust  
Donald E. Hancock, trustee  
Sally Jo Hancock, trustee

## Cami Petersen - Project # 961372 SSDP, Applicant Taylor Shellfish Company

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**From:** <JacobsOly@aol.com>  
**To:** <peterscs@co.thurston.wa.us>  
**Date:** 02/08/2012 11:23 AM  
**Subject:** Project # 961372 SSDP, Applicant Taylor Shellfish Company

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Ms. Petersen:

Please accept this email as my official comments on the above-referenced application.

I urge the disapproval of this application.

Totten Inlet has essentially become a factory farm for various kinds of shellfish.

This displaces native species, causes pollution, and gives public waters over to a private corporation.

The degradation of this inlet has been well documented, including the effects of mussel rafts.

Thank you,

Bob Jacobs

(360) 352-1346

720 Governor Stevens Ave. SE  
 Olympia, WA 98501

[jacobsoly@aol.com](mailto:jacobsoly@aol.com)

I have an urgent request of you and I hope you will take just a moment to send an email to Cami Petersen at [peterscs@co.thurston.wa.us](mailto:peterscs@co.thurston.wa.us) in response to the request for approval of a shoreline substantial development permit to construct a mussel farm consisting of 58 rafts anchored off shore along the eastern shoreline of north Totten Inlet. **Emails MUST BE RECEIVED by 4:00 PM on Friday** the 10th of February (**this Friday**). The public hearing is on Monday, February 13th, at 10:00 AM at the Thurston County Courthouse Complex, Building #1, Administration, in Olympia, WA, and you are welcome to come.

This may be the public's last chance to challenge the ever increasing commercial industrialization of Totten Inlet. We urge you to please write an email, expressing your opposition to this proposed project. (email address above). You can write a sentence, a paragraph or a page. Simply state that you are opposed to the mussel raft farm proposed for Totten inlet, or give reasons why. Sign with your name, contact info and city/state where you live. **INCLUDE in SUBJECT LINE: Project # 961372 SSDP, Applicant Taylor Shellfish Company.** I can't tell you how grateful we are for your emails. They need to hear from us, and every email will help. Remember, if all you feel like writing is a sentence, that's fine. Please just write something, even just the last line on this page.

Below is some helpful verbiage, but please read on beyond this list to understand better what is about to happen.

- \*noise and odor
- \*restricted use of water
- \*unhealthy conditions

- \*\* invasive tunicates are already found from existing mussel rafts in Totten inlet and these will multiply
- \*\* fish and wildlife are already disappearing from Totten Inlet due to the amount of shellfish farming currently

being done

\*\* natural environment should be protected rather than harmed

\*\* known negative effects on forage fish

\*\* displacement of our native mussels through colonization and hybridization

\*\* you might explain that industrial sized shellfish farming is not what you come to Puget Sound to see, but rather, you come to kayak, enjoy the water and views, wildlife and sunsets (our sunset will be drastically changed across the water)

\*\* Let them know that you do not feel that Puget Sound needs to be remembered as the biggest shellfish exporter, but instead, for protecting our natural environment and wildlife.

Taylor Shellfish Co. (Taylor) currently operates two floating mussel raft aquaculture facilities of 69 rafts at Deep Water Pt. and Gallagher Cove in Totten Inlet. Taylor proposes to add a third facility of 58 more rafts in 11.25 acres of the sub-tidal zone just off the east shore of Totten Inlet a bit north of Gallagher Cove. This location is approximately between 85<sup>th</sup> Ave NW and 90<sup>th</sup> Ave NW and within a Conservancy Shoreline Environment as designated by the Shoreline Master Program for the Thurston Region.

The mussel species is *Mytilus edulis galloprovincialis* which is not native to Puget Sound and potentially invasive. With the proposed expansion, there will be a total of 127 mussel rafts in Totten Inlet. Each raft is 30 X 34 feet in size (about the size of a small family house) and may generate an average of 20,183 lbs of mussels per growing period (16 months). The 127 rafts may produce a combined 2,563,241 lbs of mussels every 16 months. These are big industrial operations and bring collateral human impacts in the forms of noise, noxious odors, destruction of views, impacts to free public navigation, and reduced personal real estate values.

Critical environmental concerns of this proposal include Carrying Capacity (availability of micro-food organisms) of Totten Inlet to support all native marine life, i.e. bait fish and juvenile salmon; Flushing Capacity to disperse the mussels biological waste (up to 5% of body mass or about 64 tons every 16 months); Water Quality (circulation, excess nutrients, dissolved oxygen); and the potential of these non-native mussels to displace native mussels through colonization and hybridization.

Thurston Co. has accepted Taylor's FINAL Environmental Impact Statement (EIS) which claims the proposed expansion of mussel rafts will not have any harmful environmental impacts. The FINAL EIS is available online at: [WWW.co.thurston.wa.us/permitting](http://WWW.co.thurston.wa.us/permitting).

**In contrast, local citizens have personally seen how the marine ecology of Totten Inlet has been harmed since large scale commercial aquaculture has come to dominate the Inlet and feel the Inlet should be preserved for the free and quiet enjoyment of the public at large rather than be destructively exploited for the private profit of one industry.**

**Cami Petersen - mussel farm**

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**From:** Carol Bealer <claylady148@yahoo.com>  
**To:** <peterscs@co.thurston.wa.us>  
**Date:** 02/08/2012 11:59 AM  
**Subject:** mussel farm

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To Whom it may concern. I often visit my brother in the Puget Sound area because it is so beautiful and peaceful. More industry is not what it needs. It would not only harm the natural wildlife in the area, it would create a huge eyesore along with more pollution. Please don't let this proposal go through!

Sincerely, Carol Bealer [claylady148@yahoo.com](mailto:claylady148@yahoo.com)

**From:** <c.yusko@comcast.net>  
**To:** Peterscs@co.thurston.wa.us  
**Date:** 02/08/2012 6:51:41  
**Subject:** Project # 961372 SSDP

Office of Hearings Examiner, The pocket estuary known as Adams Cove is at critical choice point. Of the 18 miles of shoreline of Totten Inlet, 16 miles are commercially farmed. The Mussel Farm proposed by Taylor Shellfish is prohibited by Section Two of the Shoreline Master Program for the Thurston Region. Please refer to the Conservancy Environment (WAC 173-16-040(4)(b)(ii) wherein the words "minimal adverse impact" and "not highly visible from the water" and "restore to original condition" are in direct contrast to the Mussel Farm which is to be located only 600' from the shoreline. Please take the time to walk the 1400' of shoreline and look 600' to the west and imagine a huge shellfish operation structure with boats and laborers and the dead zone under the structure. I refer you to the existing Mussel raft in Gallagher Cove for a visual read on whether its existence detracts the natural beauty of Totten Inlet for miles. You can't see the dead zone under the raft.

Preserving Adams Cove and Totten Inlet for your children and my children and their descendants is now in your hands. Please do the right thing even if it is politically difficult. The beaches are already all farms. Please save the water for the people of Washington.

Cary Yusko, 9821 Steamboat Island Rd NW, Olympia, Wa . 98502

**From:** "S & J" <lighthse3@comcast.net>  
**To:** Peterscs@co.thurston.wa.us  
**Date:** 02/08/2012 7:12:09  
**Subject:** project 961372 SSDP

To Whom It May Concern,

We are writing in regards to project 961372 SSDP or what is commonly referred to as the mussel rafts at Adams Cove. We are opposed to the expansion of commercial mussel rafts to this site.

The pollutants will have an adverse impact on the environment. As we walk the beaches downwind of existing rafts it is rare we do not find plastic containers that have washed or blown from the rafts. Not only is the plastic unsightly it directly harms the animals that become entangled in it. As the plastic breaks into finer particles it continues to impact those animals that will ingest it. Scientist are just discovering the long term, negative impact of plastics in our waters.

It is ironic that as the Capital Land Trust conserves the adjacent 34 acres of upland an industrial pollution source is being considered. With the majority of Totten Inlet under aquaculture cultivation let's not allow a concentrated pollution source such as mussel rafts.

Sincerely,  
Steve and Julie Kirkwood  
2900 Steamboat Island  
Olympia, WA

**From:** Travis Hackney <thackney13@hotmail.com>  
**To:** Peterscs@co.thurston.wa.us  
**Date:** 02/08/2012 8:41:30  
**Subject:** Comment on Mussel Permit # 961372

Please see attachment. Also please reply that you have received the comment. Thank you,

Travis Hackney

**To: Thurston County Hearing Examiner**

**Comment for Public Hearing February 13, 2012 for Project 961372 SSDP**

I submitted a written comment on the EIS last summer and many of the comments I made were disregarded as they were not relating to the environmental impact of the project.

I want to start off by looking at the goals of the Shoreline Master Program, which I believe should be used as a guide in this decision.

**"The goal of the Thurston County Shoreline Master Program (SMP) is to preserve to the fullest extent possible the scenic, aesthetic and ecological qualities of the shorelines of the County in harmony with those uses that are deemed essential to the life and well-being of its citizens." Page 2-12 Draft EIS May 2010.**

It is obvious from the many comments from the citizens of this area that this mussel farm is neither wanted or "deemed essential." I believe this permit really comes down to rights of residents vs. wants of a single company. There were no positive comments about the mussel farm from anyone who actually would live adjacent to it. Many of the people in favor of the farm were from the shellfish industry or from pro-business organizations. At the end of the day they do not have to look at it, smell it, or listen the noise when they go home.

The authors of the responses to public comment on the EIS cited many times that some comments were subjective or were simply "noted." There are many objective factors as well as subjective. The SMP says that preferred uses of the conservancy environment are "of a nonpermanent nature that do not substantially degrade the existing character of the area." The character of this area is a pristine waterway with many acres of coastal forest. There are eagles that nest nearby and a unique estuary directly adjacent to the raft site. Will this mussel raft " **preserve to the fullest extent possible the scenic, aesthetic and ecological qualities of the shorelines of the County...**" SMP? I believe the wording "*fullest extent possible*" is very strong language.

In reading the responses to the public comments on the EIS it seems many of these responses were biased in favor of the permit being issued. The author's conclusion was that there were no ill ecological factors associated with the rafts or their operation. While I appreciate the EIS and its data, I find that introduction of a non-native species to a fragile ecosystem in huge numbers has the potential for catastrophe. I have a degree in Biology and have read many scientific articles and journals. Scientific conclusions can be skewed based on the researchers biases and this is why it is always important to know where funding for projects comes from. This is usually disclosed at the end of an article. The people reviewing the public comments were paid by Taylor; it would be hard for them to come to a different conclusion.

Let's look at some more objective factors: economic impact and property value decline. This raft would employ only 8 people. Is that worth having a huge eyesore in Totten Inlet that none of the area's residents want? Most of the money created from the mussel farm would bolster profits of a single company and not employ a significant number of people. Who has more rights to say what development will occur in the inlet, several residents or one company? Will this be the last floating structure allowed in the inlet? Wouldn't other shellfish companies have a right to farm mussels if Taylor is allowed this structure?

More questions: How much would property values drop and who is responsible for that decline? Who is responsible for the noise levels, the smell, the hours of operation, the disruption to families who live here? Already there are boats that operate at night farming oysters that disrupt our sleep.

"Totten Inlet, as a marine water of the Thurston Region, is within a Conservancy shoreline environment.. This environment is characterized by low-intensity land use and moderate-intensity water use with **moderate to little visual evidence of permanent structures and occupancy**. The preferred uses are non-consumptive of the physical and biological resources of the area, and activities and uses of a non-permanent nature that do not substantially degrade the existing character of the area." *Shoreline Master Program section 2B*. From our experience, there is significant visual evidence occupancy in taking family walks down Hargis Street. How can a raft structure that is nearly 1.5 acres be in compliance with a Conservancy Shoreline designation? No one can argue that there would not be "visual evidence of permanent structures and occupancy." The response to this comment is that the structure is not permanent. Again I ask, will this floating structure ever be removed once in place? The other mussel farm in Totten has a 15 year lease. This timeframe seems pretty permanent as this is enough time for my two year old to be driving a car.

Section 3 of the SMP give guidelines when considering changes within an Aquaculture District. "Impacts to be considered in this determination include: aesthetics, water quality, navigation, noise, odor and waste management." I think we can all agree that the existing mussel farm at Gallagher Cove is unaesthetic, smells, and can be noisy when in full operation. The EIS states that the proposed farm would operate six days a week.

This is a historic moment to let the shellfish companies know that no additional floating structures will be tolerated and follow the guidelines of the Shoreline Master Program. The SMP speaks a lot about preservation of the character of a site; such a large structure would change this area forever. The changes would be "scenic, aesthetic, and ecological" in nature. I believe we should all re-read the goals of the Shoreline Master Program and envision what the people were thinking when they wrote them down. I chose this place to raise my family because of the adventure, beauty, and education that the inlet brings us every day. Having to look at 1.5 acres of a raft structure, operating 6 days a week, would change Totten Inlet indefinitely and would offer zero benefit to the people who call this area home.

Dr. Travis Hackney and Family  
8739 Adams Lane  
Olympia WA 98502

**From:** Joni Chavez <joni.chavez@comcast.net>  
**To:** Peterscs@co.thurston.wa.us  
**Date:** 02/08/2012 10:18:26  
**Subject:** Project #961372 SSDP, Applicant Taylor Shellfish Company

I am sending this email in order to express my opposition to the mussel raft farm proposed for Totten inlet. As an out-of-town visitor to the state of Washington, industrialized shellfish farming is certainly not what I make a trip to Puget Sound to see. I feel it is of the utmost importance to protect the natural environment, beauty and wildlife of the Puget Sound. It is one of the more beautiful places in the United States and should be preserved as such.

I appreciate your thoughtful consideration in this matter.

Joan Chavez  
3505 Kelvin Avenue N,  
Lake Elmo, MN 55042

Sent from my iPhone

**From:** Paul J Allen <pauljallen@me.com>  
**To:** Peterscs@co.thurston.wa.us  
**Date:** 02/09/2012 10:39:55  
**Subject:** Project # 961372 SSDP, Applicant Taylor Shellfish Company

Dear Ms. Peterson,

Please accept these comments sent on Feb. 09, 2012.

I live on the Eld Inlet side of Steamboat Island Peninsula and strongly oppose industrialized, intensive aquaculture such as Taylor United's request for approval of a shoreline substantial development permit to construct a mussel farm consisting of 58 rafts anchored off shore along the eastern shoreline of north Totten Inlet.

I have seen the damage this practice does to the tidelands.

The visual pollution is significant and lowers my property value.

I find plastic tubes and netting on my beach from the few aquaculture operations that now exist on the Eld side. The damage will become worse if more intensive aquaculture operations are allowed.

Shellfish do not "clean" or "purify" Puget Sound. They filter out plankton which makes the water more clear, but clear water is dead water. If aquaculture operations expand, the shellfish will eat plankton that native species need to survive.

Intensive aquaculture operations are harmful to Eel Grass beds, and therefore the aquaculture operations harm tideland habitat indirectly as well by poisoning off Eel Grass and other wetland animals that make up a healthy Puget Sound.

Sincerely,

Paul J Allen  
2215 Schirm Loop Rd NW  
Olympia, WA 98502  
360-867-9341

# Michael Kent Thompson, MD, FACEP

Board Certified Emergency Medicine  
1001 Cooper Point Rd SW Suite 140 PMB 167  
Olympia, WA 98502  
skydocnet@comcast.net 360.867.0000

9 February 2012

Attn: Ms. Cami Petersen

Dear Ms. Petersen:

I live on Totten Inlet. Imagine if you will the effect this project would have on YOUR own home:

- The stench of tons of mussel waste polluting the environment of your home!
- The entire water view from your home destroyed by floating mussel rafts!
- The sudden loss of perhaps 50% of the value of your home!

Let us keep the pristine beauty of the South Sound undisturbed. Why destroy this environment to further enrich an already multimillionaire Taylor family.

Sincerely yours,



Michael K. Thompson, MD

**From:** Robert Wenman <rwenman.skier1@yahoo.com>  
**To:** Peterscs@co.thurston.wa.us; rwenman.skier1@yahoo.com  
**Date:** 02/09/2012 3:22:56  
**Subject:** Project # 961372 SSDP, Applicant Taylor Shellfish Company.Totten Inlet Mussel Rafts

Thurston County

Cami Petersen;

I am writing to voice my opposition to the proposal by Taylor Shellfish (Project file #961372) to install additional musselrafts in Totten Inlet, located in unincorporated Thurston County. I am a resident homeowner on puget sound so I believe I have standing in consideration to impacts to our state waters, that also as a boater , I have frequently enjoyed these waters.

I am concerned that this proposal is not in-keeping with your shoreline master program, that it directly interferes with the public use of these waters, and is not consistent with the goals of your program to insure that the public use doctrine is upheld.

Am also quite alarmed that this proposal may be permitted, knowing that the aquaculture industry has severely degraded these waters, in water quality and fish habitat as well documented by the record. I also am quite alarmed that the cumulative impacts have not been adequately considered by the EIS, on what the impacts would be to at least Totten Inlet if the aquaculture interests were allowed to maximize the use of these public waters for their private gain, in the combination of oyster, geoduck, and mussel rafts. The use of these waters by the aquaculture industry mostly expanded without permit has transformed these waters into a commercial aquaculture wasteland, that interferes with the public's right to these waters and shorelines contrary to the objectives of the County's Shoreline Master Program and state Shoreline Management Act.

Specific concerns:

- \*\* invasive tunicates are already found from existing mussel rafts in Totten inlet and these will multiply
- \*\* fish and wildlife are already disappearing from Totten Inlet due to the amount of shellfish farming currently being done.
- \*\* natural environment should be protected rather than harmed. This adverse impact on ESA listed fish is in violation of ESA and state objectives to improve puget sound habitat.
- \*\* known negative effects on forage fish. The application does not adequately mitigate for these impacts as required by state law.
- \*\* displacement of native mussels in Totten Inlet through colonization and hybridization.
- \*\* High concentration of mussel rafts will severely shade areas that are suitable for eelgrass, and algae needed to support foraging fish.

For these reasons, application # 961372 SSDP, Applicant Taylor Shellfish Company.Totten Inlet Mussel Rafts should be denied based on overwhelming evidence of adverse impacts that have not been adequately mitigated; and not in compliance with the goals and policies of the County's Shoreline Master Program directly

impacting the marine life of Totten Inlet, and contrary to the public's use and enjoyment of these public waters.

Please include me as a interested party, and forward notice of public hearings for this application.

Sincerely

Rob Wenman  
8416 131st ST NW  
Gig Harbor, WA 98329

**From:** <t.eggleston@comcast.net>  
**To:** Peterscs@co.thurston.wa.us  
**Date:** 02/09/2012 6:47:08  
**Subject:** Mussel Rafts

February 9, 2012

Cami Petersen, Administrative Assistant II  
Thurston County Resource Stewardship Department  
2000 Lakeridge Drive SW  
Olympia, WA 98502-6045

It is extremely upsetting to me that we have and could have even more large industrial sized mussel rafts in Totten Inlet. They are very unsightly, affecting shoreline property values and ultimately the entire inlet, resulting in a loss of income to the Griffin and Olympia School Districts. This project would also alter the lifestyles of the residents of the area. Totten Inlet is one of the most beautiful regions in the world; putting these very large mussel rafts there is a crime against nature. This action would be so unfair to the residents of the community, those who care for, and nurture the inlet and the sea life that exists.

Taylor Shellfish has shown itself to be very inconsiderate neighbors. There is never any oversight of the crews presently working with the geoduck farming. Their employees are very loud, using foul language (their voices carry because of the water effects on sound transmission) in an area where we, as residents, are very careful never to play loud music, or make loud noises, for fear of disturbing our neighbors. The industrial shellfish crews are extremely messy. Please note the photos taken and sent in by another neighbor- I've seen these rafts when kayaking, and they are indeed unkempt, messy and a real eyesore. But Taylor just doesn't seem to care.

The fear of invasion of non-native species is real. Escaped salmon from salmon farms have been a disaster in many regions. In 1972, Gyrodactylus, a parasite, spread from Norwegian hatcheries to wild salmon, has devastated some wild salmon populations. ISAv, an infectious salmon parasite, is so dangerous that when an outbreak occurs, entire populations of farmed salmon must be destroyed, but those salmon that have escaped the pens, and endangered native populations, cannot be destroyed. Death rates from ISAv can reach 100%. Farmed salmon can, and often do, escape from sea cages, and the farmed salmon interbreeding with wild salmon can result in reduction of genetic diversity, disease resistance and adaptability, etc. (Wikipedia, The Oregonian – November 30, 2001). The huge proliferation of Scotch Broom would be another example of a non-native species, without natural enemies to keep proliferation in line, going wild and taking over an environment. There are many other invasive non-native species: the snail that has invaded Capital lake, for example. Despite the County having spent huge funds trying to eradicate this severe pest, hoping to contain it before it moves upstream and affects the fisheries throughout the region, that threat still exists. Or the Japanese Knotweed, a plant considered so invasive that whenever it is discovered, the County sends crews out to burn it. The huge sums of money, the threats to our environment, are so severe, and the County has to deal with these issues. Some of these species are not a problem in other environments, but they are in ours. Will Thurston County have the means to check up on the mussel rafts to make sure that the waters are not being invaded by another foreign specie: Gallo Mussels are not native. Or will the County need to check to make

sure tunicates are not invading our inlet? Who pays for all of that? And can it even be done? What could be the results of an invasion of Gallo Mussels escaping from these rafts and causing havoc with native species of mussels? Or other shellfish?

How much harm to the ecosystems, to the residents, to the environment, can we allow, for the profit of one company? And why doesn't Taylor want to put these very ugly mussel rafts in front of his house? Then he could oversee the project, which he certainly is not doing now. But that action would still have a negative effect on the ecosystem, an action we cannot condone. We have a moral obligation to our progeny. We have a responsibility to leave the environment in no worse condition than we inherited. This should be our duty and our major goal.

Please help us, and our community, by denying Taylor Shellfish, or anyone else, such intrusive industry as mussel raft farming.

Thank you,

Ted Eggleston  
9431 Steamboat Is Rd NW  
Olympia, WA

**From:** Roberta Wright <wrjaime@net-venture.com>  
**To:** Peterscs@co.thurston.wa.us  
**Date:** 02/09/2012 1:51:28  
**Subject:** mussel rafts project # 961372 SSDP

to whom it may concern,

we have a cabin on totten inlet in thurston county (olympic view HOA).

the addition of eleven acres of mussel rafts off our property would further depress our real estate value even more in this poor economy.

also, the existing rafts near gallagher cove are an ugly eyesore. why add to this unsightliness.

don't allow more rafts!

thank you,

mark r. de Lorenzo  
1060 monterey lane  
fircrest wa 98466

**From:** Roberta Wright <wrjaime@net-venture.com>  
**To:** Peterscs@co.thurston.wa.us  
**Date:** 02/09/2012 2:18:49  
**Subject:** mussel rafts project # 961372 SSDP

To whom it may concern:

Our family has a cabin on Totten Inlet in Thurston County. I spend a lot of time there kayaking and relaxing. In the summer months I often kayak after dusk. I find the mussel rafts to be a dangerous entity in the bay. When coming on them at night I have come close to running into them with my kayak. Totten Inlet is a busy boating area not only for kayaks but for small fishing and pleasure crafts. I worry that one of these days we will have an accident with someone plowing into these rafts. The new raft location is in the major boating area of the inlet.

Not only do I find these rafts dangerous but ugly. We are so lucky to have such a beautiful pristine bay. Its a crime to see Taylor build these horrible looking rafts with ugly barrels, equipment and other debris that collects on the rafts. The location for the new rafts is within sight of our cabin. It is a travesty that not only our view but that of our neighbors and anyone visiting will be marred by the sight of these ugly rafts.

PLEASE, NO MORE MUSSEL RAFTS IN TOTTEN INLET.

Sincerely,

James E. Wright  
Roberta DeLorenzo Wright  
4420 Alameda Ave W  
University Place, WA  
98466-6313

**From:** Jadon Rudolph <jadonr@aol.com>  
**To:** Peterscs@co.thurston.wa.us  
**Date:** 02/09/2012 3:14:59  
**Subject:** Mussel Rafts. Project #: 961372SSDP

To Whom It May Concern,

For 30 yrs we've had two families living on Totten Inlet and we've enjoyed everything the inlet and the area has to offer, with exception of these mussel rafts.

Why is the government allowing more mussel rafts on the inlet, changing it from a residential area with many beautiful homes into an ugly industrial zone?

Please don't put anymore mussel rafts on the inlet and ruin a beautiful and pristine area.

Sincerely,  
Dolores DeLorenzo  
3740 85th Ave. NW  
Olympia, WA 98502

**From:** "Dan DeLorenzo" <ddelorenzo@bckinc.net>  
**To:** Peterscs@co.thurston.wa.us  
**Date:** 02/09/2012 3:15:13  
**Subject:** FW: Taylor Shell Fish Company & the Mussel Rafts Project # 961372 SSDP

For the Thurston County Hearing Examiner and all other interested parties.

We own property in Thurston County that is located on Totten Inlet within 3000 feet of the proposed 58 mussel rafts. Each of the proposed 30 X 34 feet rafts is the approximate size of a small house and the proposed area is approximately 2 acres when including the space between the rafts. With the proposed expansion there will be a total of 127 rafts on Totten Inlet that may produce a combined 2,563,241 pounds of mussels every 16 months. We are concerned with the environmental damage and they will create as well as discarded shells and goop that will litter the shores. Noxious odors, noise, destruction of views, navigation issues and reduced property values are other major issues that cannot be ignored. This is not China or Russia where pollution is rampant.

The University of Washington environmental marine department informed me 9 years ago that Totten Inlet had the purest water in Puget Sound. This was from a marine biologist that was in her float plane taking water samples in the middle of the inlet. Do we want to change that?

The profits of Taylor Shellfish Company should not trump the rights of the rest of the State of Washington. If they are granted the right to expand I will lead the charge to have all homes reappraised by Thurston and Mason Counties. Our reduction in taxes will offset Taylor's lease fees. Some beach and view homes might drop by over 50% and we will sadly have the resulting sales reports to back this up. As the shoreline home values decrease interior located home values will follow.

PLEASE STOP TAYLOR BEFORE HE GETS A BIGGER FOOTHOLD. HE WILL NEVER BE HAPPY UNTIL HE HAS COLONIZED EVERYTHING IN HIS POWER.

Sincerely,

Daniel J. DeLorenzo, CIC  
Vice President  
Bannon Carlson & Kessel, Inc.  
2121 70th Ave. W., Suite B  
University Place, WA. 98466  
253-565-3500 ext 103  
800-221-4789  
ddelorenzo@bckinc.net  
www.bckinsurance.net

<mailto:ddelorenzo@bckinc.net>

**From:** "Dan DeLorenzo" <ddelorenzo@bckinc.net>  
**To:** Peterscs@co.thurston.wa.us  
**Date:** 02/09/2012 3:26:28  
**Subject:** Project # 961372 SSDP Taylor Mussel Farm

No more rafts please. They are really ugly and do not belong in our pristine Sound.

Teresa DeLorenzo  
1227 Palm Drive  
Fircrest WA. 98466

**From:** <njlabell@comcast.net>  
**To:** Peterscs@co.thurston.wa.us  
**Date:** 02/09/2012 5:43:44  
**Subject:** Our input regarding Taylor Mussel Raft Expansion

To Whom It May Concern:

We are property owners on the bluff overlooking the proposed mussel farm expansion on Totten Inlet. In the past weeks we have drafted, and then discarded, several politically correct letters referencing objections by conservancy organizations and property owners. But you've heard those arguments. What we really want to express is our dismay that this development is actually being considered.

Have you seen this inlet? It is a pristine and lovely piece of our state and is enjoyed by property owners and recreationalists year around. There are eagles daily; grey whales occasionally. Kayakers, water-skiers, sailboaters, fishermen; but most often no one at all. Research boats from UW and WSU study its pure beaches and waters. How could anyone even consider allowing an industrial operation with its related noise, disruption of views, and unsightly rafts and floats on this water? Particularly when the business will introduce non-native mussels into the ecology. All of this disruption affecting so many people and native marine life for the benefit of one business? Now Totten Inlet might be turned into an aquaculture industrial park? Seriously?

Please list us as opposed to this mussel operation.

The Capitol Land Trust recently obtained the estuary at Adams Cove for the benefit of the general public. Their website will explain why this delicate balance should be preserved in this area.  
(<http://www.capitolandtrust.org/totten.htm>)“

Sincerely,

Nan & Jan LaBell  
8911 Adams Lane NW  
Olympia, Wa

**From:** "Craig Chapman" <craig@thechapmans.com>  
**To:** Peterscs@co.thurston.wa.us  
**Date:** 02/09/2012 5:44:45  
**Subject:** mussel rafts project # 961372 SSDP

To Whom It May Concern:

I am a property owner with waterfront property on Totten Inlet. My address is as follows:

Craig and April Chapman

3720 81st Ave NW

Olympia, WA

My family and I enjoy our use of this part of Puget Sound through boating, swimming and other recreational activities. We are extremely concerned about the potential addition of more mussel rafts by Taylor Shellfish in the waters that we enjoy for both their beauty and for enjoyment.

According to the Public Trust Doctrine, the Puget Sound is held by the State of Washington in trust for the benefit of the use of all of the People of the State of Washington. I would strong argue that the Government should not permit a private corporation to use what is a public resource (the public trust) for private use or gain. Clearly, Taylor Shellfish has no claim or right to use our public waters for their corporate gain and there is no public benefit for allowing them to do so.

Furthermore, it's my understanding that the muscles cultivated by Taylor are hybrid mussels not native to Puget Sound. We have already seen evidence that they migrate off the rafts and colonize on the beaches and this can't help but change the ecosystem. I can tell you from experience that these colonies sometimes give off an awful stench during the low tides on hot days. In terms of boating, additional rafts will simply add more interference to navigation and present a hazard to other users of the Puget Sound for fishing and recreation.

As a taxpayer, voter, and homeowner, I STRONGLY urge you to deny the Taylor Shellfish request to add additional muscle rafts to our state waters.

Sincerely,

Craig Chapman

Craig Chapman | cell 425-941-5679 | <mailto:craig@inrix.com>  
craig@thechapmans.com

**From:** Jamie Dudman <studwomyn@gmail.com>  
**To:** Peterscs@co.thurston.wa.us  
**Date:** 02/09/2012 7:32:31  
**Subject:** Project #961372 SSDP Applicant: Taylor Shellfish Company

Dear Cami Peterson,

I am opposed to mussel raft farms in Totten Inlet proposed within a Conservancy Shoreline Environment as designated by the Shoreline Master Program for the Thurston Region. The inlet is already over-farmed and at low tide, it is hard to navigate near the shoreline with kayaks and young children. Birds, seals, starfish, sand dollars and small crabs are already disappearing from the inlet. Enough devastation has already occurred, and the addition of these mussel rafts will add more. Totten Inlet is a small inlet and it belongs to the public, not Taylor Shellfish Farms. The EIS may say that there will be minimal impact, but our eyes as citizens tell us the inlet is already changing from all the industrial farming being done over the last few years. So the cumulative effect will be devastating. Let's not create more detriment to the environment that will take tax dollars to undo in the coming years.

Sincerely,

Jamie Dudman  
3200 Capital Mall Dr SW #S103  
Olympia, WA 98502

**From:** MARY COOK <tankerspouse2@yahoo.com>  
**To:** Peterscs@co.thurston.wa.us  
**Date:** 02/09/2012 8:07:13  
**Subject:** Totten Inlet

Sir, It has recently come to my attention that Totten Inlet is under threat of expanded mussell farming. I have spent many hours kayaking this area and cannot believe that you would even CONSIDER this proposal. We are active duty military and are planning on retiring in this area. The idea of spoiling the environment in this way certainly makes me think twice about purchasing a home. I shudder to think what other poorly considered ideas I would have to deal with if I follow through with our long standing plan of returning to our favorite duty station and settling down. Please reconsider. If the short term gain for this company costs the long term future of the environment, we are short sighted indeed.

Command Sergeant Major and Mrs. Charles Cook

**From:** Darci Kirk <delorenzo@msn.com>  
**To:** Peterscs@co.thurston.wa.us  
**Date:** 02/10/2012 12:12:28  
**Subject:** Taylor Shell Fish Company & the Mussel Rafts Project # 961372 SSDPp

To whom it may concern;

Please consider the ecological impact it will have on North Totten Inlet if Taylor is allowed to construct a mussel farm. These mussels are hybrid and therefore not native to the Puget Sound and will drastically change the ecosystem. Thick colonies will accumulate on the beaches and stink during low tides on hot days. Their excrement will smother the local critters that live on the floor of the Sound beneath the rafts. They will out-compete the natural local shellfish for nutrients in the water and will alter the sensitive balance of the ecosystem. Please don't let Taylor ruin the beautiful natural pristine waters of Totten Inlet.

Sincerely,

Harvey & Darci Kirk  
4410 S. 8th St.  
Tacoma, WA 98405

**From:** "Dominic D. Byrd" <dominic.byrd@gmail.com>  
**To:** Peterscs@co.thurston.wa.us  
**Date:** 02/10/2012 12:36:53  
**Subject:** Regarding Mussel Raft Project

Thurston County Commissioners,

In accordance with the "public trust doctrine," the shorelines and state waters are held by the State, in trust for all the people of the state. /Biggers v. City of Bainbridge Island/ 162 Wash.2d 683, 169 P.3d 14 (2007).

The doctrine reserves a public property interest in tidelands and the waters flowing over them, despite the sale of these lands into private ownership. /Weden v. San Juan County/, 135 Wash.2d 678, 958 P.2d 273, 283 (1998).

Furthermore, the state can no more give away the public interest than it can relinquish its police powers in the administration of government and the preservation of the peace. The state can only divest itself of interests in the state's waters in a manner that does not substantially impair the public interest. /Esplanade Properties, LLC v. City of Seattle/, 307 F.3d 978, 33 Env'tl. L. Rep. 20 (2002).

The public interest includes the public's right to navigation, commerce, fisheries, recreation, and environmental quality. /Citizens for Responsible Wildlife Management v. State/ (2004) 124 Wash.App. 566, 103 P.3d 203

The mussels cultivated by Taylor Shellfish Farms Inc. in Totten Inlet are dangerous to the ecosystem of the Puget Sound. The mussels grown by Taylor's corporation are not a native species to the Pacific Northwest and will damage natural resources. Physical evidence can be found by observing the damage done to other Puget Sound beaches. In Penn Cove, the same species of mussels are cultivated in the same manner as intended for Totten Inlet. The waste created by these mussels has permanently altered the ecosystem at Penn Cove. The detritus secreted by the mussels builds on the beach at an alarming rate, suffocating native species of shellfish and other beneficial organisms. The damage has left areas of Penn Cove polluted and unusable for recreation and commerce, and has significantly reduced the quality of the environment.

Taxes and "job creation" generated by the mussel industry may promote the interests of the public, but the substantial impairment to the People of Washington State is far greater. The damage caused by this non-native species inhibits access to beaches and makes other commercial shellfish production prohibitive. The public trust doctrine requires that you preclude private businesses from benefiting financially at the cost of substantially impairing the overall public interest.

I pray that the Thurston County Commissioners vote with utmost concern for the People of Washington State. And, I hope that hard economic times do not cloud judgment so far as to compromise the public's interest in safe, accessible, and environmentally sound beaches.

Thank you for your time,

Dominic D. Byrd  
1107 Hines St SE  
Salem, OR 97302

[dominic.byrd@gmail.com](mailto:dominic.byrd@gmail.com)  
[dbyrd@willamette.edu](mailto:dbyrd@willamette.edu)

**From:** Debra Thompson <debthompson58@mac.com>  
**To:** Peterscs@co.thurston.wa.us  
**Date:** 02/10/2012 4:17:06  
**Subject:** Project # 961372 SSDP, Applicant Taylor Shellfish Company

Dear Ms Petersen,

I am very lucky to have lived on the shores of Totten Inlet for 16 years. It is one of the most beautiful and pristine areas I have ever seen. I have spent many days kayaking and exploring this wonderful and clean inlet. I can not imagine that adding another 58 mussel rafts will not harm the clean waters that we enjoy here. The massive waste material produced, the possible displacement of our native mussels, and the effect on our fish and wildlife are just a few of the major impacts that this will have on Totten Inlet. Destroyed views, decreased property values and the restriction of the use of the area in question are also at issue. I can only hope that this project will not advance and that I will be able to continue kayaking a clean and unobstructed waterway.

Debra Thompson  
9521 Steamboat Island Rd NW  
360-867-0000

**From:** "Spence Weigand" <spenceweigand@comcast.net>  
**To:** Peterscs@co.thurston.wa.us  
**Date:** 02/10/2012 1:16:23  
**Subject:** Mussel farm proposal

Mr Peterson-

My name is Spence Weigand, and I would like to weigh in on the proposed mussel farms on Totten Inlet here in Thurston County. I am a Realtor who specialized in selling salt waterfront here in our county on all four of our peninsulas. I am considered by peers-and the public----to have a certain degree of expertise in that arena.

There is no question in my mind that there will be significant deleterious effects to the fair market values of those waterfront owners who would be unfortunate victims if the proposals are permitted, and enacted. Those negative impacts will be both visible and audible in nature. The number one factor driving waterfront property pricing is the quality of the view. Buyers seek wide and unobstructed natural views of our South Sound waterways, and their ever-changing and seasonally driven panoramas. The rafts are unsightly, and are fixtures that don't reflect the ebbs and flows of waterfront living. They can also be noisy which will impact value, much as the log booms and port activity negatively impact those close-to-town waterfront owners who reside along the two shorelines of Budd Inlet.

Aside from having a certain negative dollar impact on the value of the their property, waterfront owners with views of floating mussel aquaculture may also face issues with sheer salability, as the pool of prospective buyers who will consider those types of property for purchase will winnow dramatically. My personal experience is that buyers want big, broad, and unobstructed natural views; they also want a tranquil setting. If a property offers neither, they will turn a different direction.

It is my sincere hope that the Thurston County decision-makers who are evaluating the sagacity of allowing mussel aquaculture on Totten Inlet will take my insight into consideration. Thank you in advance for your ear.

Sincerely,

Spence Weigand

Spence Weigand, Realtor  
"Olympia's Finer Properties"

Direct 360.789.3160

Office 360.352.3756

Fax 360.357.3720

Web [www.SpenceWeigand.com](http://www.SpenceWeigand.com)

[www.OlympiaWaterfront.com](http://www.OlympiaWaterfront.com)

Virgil Adams Real Estate

**From:** <KATSEA@aol.com>  
**To:** Peterscs@co.thurston.wa.us  
**Date:** 02/10/2012 1:24:59  
**Subject:** re: Project # 961372 SSDP, Applicant Taylor Shellfish Company

To: Cami Petersen  
Thurston County

From: Kathy (Katherine J) Knight  
536 Dover Pt. Way NE  
Olympia, WA. 98506  
(360) 352-5545

RE: Increasing industrial use of South Puget Sound Water

Since spring of 2006, I have been an active participant in South Sound groups who are alarmed at the increasing amount of our shoreline that is being used for industrial, commercial use by increasingly aggressive shellfish operations which include mussels rafts, oysters, clams, and geoducks. It is my understanding that much of this (these) industries clear-cut native species, plant and grow non-native species. In addition, I have seen photos of the invasive tunicates and the "dead zones" under these rafts..

I have observed in my own small part of south Puget Sound rafts, various equipment, nets, debris, etc. as a result of some of this industrial "farming".

I have lived on a beach in Puget Sound since the early 1950s and have watched children and grandchildren, friends, groups of school children, home school groups, etc. enjoy the beaches, walk, swim, kayak, water ski, collect shells, dive, snorkel, and learn about the salt water environment and the "critters" that are part of the total environment. I watch an eagle nest near the water (near an industrial farm) each year send forth a fledgling.

So, I say, ENOUGH !. I urge no more expansion of the existing shellfish industrial development and that STATE and COUNTY officials take responsibility for keeping Puget Sound as a place for the people of the state to enjoy the natural world without mucking it up with rafts, nets, compressors, barges, people working all night in front of homes not involved in this invasive industry.

Please deny this additional Mussel Farm in Totten Inlet.

Kathy Knight  
2/10/2012

CC: jroly@comcast.net; pauljallen@mac.com

**Cami Petersen - RE: Mussel farm proposal**

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**From:** "Spence Weigand" <spenceweigand@comcast.net>  
**To:** "Cami Petersen" <peterscs@co.thurston.wa.us>  
**Date:** 02/10/2012 1:43 PM  
**Subject:** RE: Mussel farm proposal

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Yes, thank you. I can be reached at:

806 State Ave. NE  
Olympia, WA 98506

And my apologies for the errant guess on your gender in my note to you Cami. I hope you can forgive me.

Thanks, Spence

**Spence Weigand**, Realtor  
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Web [www.SpenceWeigand.com](http://www.SpenceWeigand.com)  
[www.OlympiaWaterfront.com](http://www.OlympiaWaterfront.com)  
Virgil Adams Real Estate

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**From:** Cami Petersen [mailto:peterscs@co.thurston.wa.us]  
**Sent:** Friday, February 10, 2012 1:33 PM  
**To:** Weigand, Spence  
**Subject:** Re: Mussel farm proposal

Hello,  
Your comment has been recieved and will be given to the Hearing Examiner on Feb. 13th.

If you would like to be added to the decison mailing list please send me your address.

Thank you,

Cami Petersen, Administrative Assistant II  
Thurston County Resource Stewardship Department  
2000 Lakeridge Drive SW  
Olympia, WA 98502-6045  
(360) 754-3355 ext.6348  
(360) 754-2939 fax

>>> "Spence Weigand" <spenceweigand@comcast.net> 02/10/2012 1:16 >>>  
Mr Peterson-

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Sincerely,

Spence Weigand

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