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San Juan County Community Development and Planning
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Dec. 20, 2018

Comment on PSJ000-18-0003 Dickhaus Joint Use Dock

This application is for a large dock (pier, ramp, floats, and stairs) to be shared among up to 6 lots fronting Westcott Bay. While the 'porcupine effect' of adding more docks to Westcott and Garrison Bay likely has cumulative effects on marine resources, this application appears to satisfy the County's requirements for joint use, thus reducing this future porcupine effect. There did not appear to be any discussion of the *need* for this dock; the Roche Harbor Marina is extremely close by car – is the environmental disruption to the bay adequately justified?

The mitigation efforts that are conditions for the permit approval are all good ones for this area – removal of the derelict float, beach nourishment, removal of other stairs, and backshore planting are all appropriate efforts to undertake.

A few comments on details:

1. The Jen-Jay report did not provide any detail about the subtidal survey, unlike in his usual biological assessments. In several places the report mentions subtidal mud, and lack of eelgrass, but having more detail on the benthos would make it possible for me to comment more effectively on impacts on marine resources. Perhaps this information was in additional appendices that were not included.
2. While all eelgrass disappeared from Westcott Bay in the late 1990s, for reasons that remain unclear despite considerable research, before that time there was a continuous band of eelgrass in the area where the dock is proposed. There is hope that it may return (along with the herring that spawn on it) – and if this happens, the dock (and buoys, see item 4) will be right over the eelgrass area. I know that we cannot deny applications based on this kind of 'potential' habitat use, but the applicants (and County) should acknowledge that a large dock like this does not cause "minimal" shading and light reduction as the SEPA form states. As their own numbers show, only 60-70% of ambient light can get through 'properly' grated docks and ramps; and none can get through attached boats. So there is real potential for future negative environmental impacts of this dock.
3. The various reports do not make it clear how the owners of the different lots will access the dock. There are descriptions of a new stairway to the shore but that appears to be there to allow shore access, not as a way for boat-owners to get to the dock. Will there be paths along the backshore,

- and if so will there be eventual requests for a way to stabilize or shore up such paths? If so, that would expand the impacts of this project.
4. Finally and most significantly, the SEPA checklist mentions an 'existing mooring buoy' that will remain in place, but provides no other information (and no buoys are shown in any of the photos or diagrams). The Jen-Jay report actually mentions "buoys" (plural) owned by the property owners involved in the dock proposal. Buoys, even ones of modern design, can impact organisms on the bottom of the bay, especially in soft-sediment areas where chains stir up the mud. A buoy chain by itself could readily pull up small eelgrass plants 'trying' to reestablish in the area. **I see no justification for allowing these applicants to build a very large new dock AND keep existing buoys.** *I strongly recommend that an additional mitigation measure be placed on this project of removing all buoys owned by the joint-dock applicants.* Docks are sometimes needed to replace buoys, but having both can result in unacceptable potential impacts to marine resources.

Thank you for giving FHL the opportunity to comment on this application.

Sincerely,

A handwritten signature in cursive script that reads "Megan Dethier".

Dr. Megan Dethier
Associate Director for Academics and the Environment
Friday Harbor Laboratories