June 6, 2025

City of Westport
Attention: Tom Cappa, SEPA Responsible Official
PO Box 505
Westport, Washington 98595

Via Email: wgl.wlsp.deis.comments@gmail.com

In Re: Westport Golf, LLC Proposal, Draft Environmental Impact Statement, 25-COW-EIS-01

Friends of Grays Harbor (FOGH), a Washington State 501c(3) nonprofit corporation, is a 100% volunteer citizens group made up of crabbers, fishers, oyster growers and caring citizens from throughout the Grays Harbor, the State and the Pacific Northwest. The mission of FOGH is to foster and promote the economic, biological, and social uniqueness of a healthy Grays Harbor estuary. The goal of FOGH is to protect the natural environment and human health in Grays Harbor and vicinity through science, advocacy, law, activism and empowerment.
Through building coalitions with other individuals and organizations, FOGH has filled a need in becoming a clearinghouse for clean water information and leaders in the fight for intelligent growth practices that preserve the integrity of water quality and the rural character of the lower Chehalis River Basin and the Grays Harbor Estuary. We present the following comments and concerns on behalf of FOGH, including Rachel Haymon (Klickitat County, WA), Martha Hall (Anacortes), Shari L. Tarantino, Exec. Director, Orca Conservancy, Teri Wright (Forest/Salmon/Orca Advocate, Washington), Heather Nicholson (Concerned Citizen, Washington), and Carole Sunde (Westport). We incorporate by reference the comments of Anne Beasley, Meghan Anderson, Audubon Washington, Grays Harbor Audubon, Arnie Martin, Scott Mazzone, Peter Riggs, Quinault Indian Nation, Surfrider Foundation, Twin Harbors Waterkeeper, South Sound Sierra Club, Craig Zora, Carole Sunde, Thomas Matlack, Kathryn Myrsell, Greg Eide, Bobby Witkop, Sasha Medlen, Brian Kirk, and David E. Ortman.

In addition, since this project shares similar issues with the previous golf course proposal, Links at Half Moon Bay, upon which we extensively discussed our concerns, we therefore incorporate those comments by reference. FOGH is disappointed that we must once again provide comments on another proposed development of the approximately 562 acres (sometimes referred to as 602 acres) of publicly owned park property into a golf course. We are troubled by its obvious and apparent inadequacies. We trust that the City of Westport (City) will agree that the version of the proponent's No Action Alternatives Analysis appears to be more of an attempt to backfit their own site selection. Rather this process should be an actual demonstration of practicability coupled with the least amount of impact to the wetland and aquatic environment. We are particularly appalled that this important park, purchased with public funds and consolidated into a major interdunal wetland treasure will be completely appropriated by a private pay-to-play operation and the only parts of the park that will remain open without fee are unusable because of the inundation and wetlands. In our opinion, the Draft Environmental Impact Statement is inadequate, and no final or long-term decision should be made based on it. The project poses a threat to the current economic foundation of the local community. Therefore, any proposed use of this property should be in the public interest and align with the public trust.

We also object to the City of Westport being the lead agency for this SEPA project proposal, as it owns property that will be sold to the developers if the project is approved. This raises concerns about the impartiality of any decisions made by the City.

Thank you for this opportunity to comment

Arthur (RD) Grunbaum
President of the Board
FOGH (Friends of Grays Harbor)

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I. Project Background and Description

- The proposed action involves a three-phased development over a 15-year time span of a destination resort including a luxury hotel, club house, dining facilities, a separate "short" course, driving range, and an eighteen-hole Scottish Links-style golf course. Two proposed Alternatives and a No Action Alternative are being considered for review under the Draft Environmental Impact Statement (DEIS).
- The proposed location for this project is on approximately 562 acres in the western portion of the City of Westport (City). This property (Westport Jetty to Ocean Avenue) has approximately 2071 meters (6794 feet) of Pacific Ocean frontage. The property was recently consolidated into the 562 acres (sometimes expressed as 602 acres) with the $1.9 million dollar publicly funded purchase by Washington State Parks of approximately 300 acres of the formerly owned Mox Chehalis, JD Financial property in the 2015-2019 time period.
- The Fact Sheet notes that the proposed project is located at the northern end of the Point Chehalis peninsula and is bounded on the west by the Pacific Ocean, on the north by Half Moon Bay and on the east by the City of Westport.
- At present there is a cement pedestrian walkway that follows the shoreline of Westport Light State Park providing public access.
- According to the DEIS Summary, Washington State Parks and Recreation Commission (WSPRC) and Westport Golf Links, LLC (WGL) entered into a Memorandum of Agreement (MOA) dated and signed by WSPRC 8/7/2020 and by WGL 10/12/2020. That agreement stated, "Westport Golf INC. will demonstrate the ability to fund and/or finance the costs associated with development and operation of a Scottish Links-style golf course and ancillary facilities to the satisfaction of State Parks."
- The DEIS lists approvals required from the City of Westport, State of Washington and Federal Government, but doesn't refer to any approvals from Grays Harbor County.

II. Wetlands and Aquatic Resources of National Importance (ARNI)

- FOGH notes that a significant portion of this project encompasses a vanishing and increasingly rare interdunal area and its many wetlands lying adjacent to the primary dune that separates the ocean and the subject property. The interdunal area is in fact the second largest area of this nature in the State of Washington and has been declared by the U.S. Department of Environmental Protection Agency (EPA), an (ARNI) Aquatic Resources of National Importance (EPA letter to Col. Lewis USACE 8/5/2004).
- AECOM's Final Wetland Assessment Report (AECOM 2021) mapped 337 acres of the park as a mosaic of wetlands and uplands (with 68% wetlands), contiguous with 28 acres of coastal willow swamp and 21 acres of red alder/slough sedge wetland. AECOM mapped another 28 individual small wetlands, each up to 0.43 acre, in the northwest section of the park. According to AECOM, the two constructed ponds in the northwest corner, created during the previous golf course attempt, are non-jurisdictional wetlands (i.e., not subject to federal regulations).
- Together, the mosaic and individual wetlands cover 70% of the park. This suite of wetlands is the second largest expanse of interdunal wetlands in Washington. "The interdunal wetlands at the Park represent the second largest expanse of such wetlands in Washington." (AECOM 2021a, page 27).
- The subject 562-acre property supports a high quality forested/Scrub-Shrub/Emergent Category I wetland mosaic of 386 acres with buffer widths of 225 – 300 feet. Category I wetlands represent a high-quality example of a rare wetland type and "…we cannot afford the risk of any degradation to the wetlands." (Washington State Department of Ecology, Washington State Wetlands Rating System, Western Washington, Second Edition. Page 3). Based on the exclusion of Category I wetlands, it would be reasonable to conclude that only 176 acres of the entire park would be open to the public's use and exploration. However, the proponent's Alternative I proposes to appropriate 224 acres and Alterative II, 192 acres. This is for a non-water dependent private development which excludes the public, except for a pay-to-play fee.
- Wetlands are a dominant feature of the park and AECOM identified at least 346 acres.
- Wetlands play a critical role in sustaining the coastal economy and shoreline environment supporting and nourishing fishery and marine resources. They also protect the Nation's shores from flooding, storm surge, and high energy wave action.
- Wetlands provide a unique asset to the Westport area. The interdunal wetlands under discussion here provide functions that are important for the region.
- "Runoff can alter four major wetland components: hydrology, water quality, soils, and biological resources (US EPA 1993; Johnson and Dean 1987) Because impacts to wetland components are not distinct from one another but interact (US EPA 1993), it is difficult to distinguish between the effect of each impact or to predict the ultimate condition of a wetland component by simply aggregating the effects of individual impacts

(Hemond and Benoit 1988). Moreover, processes within wetlands interact in complex ways. For example, wetland chemical, physical, and biological processes interact to influence the retention, transformation, and release of a large variety of substances in wetlands." [Wetlands and Urbanization Implications for the Future, Puget Sound Wetlands and Stormwater Management Research Program (PSWSMRP), September 26, 1996, p. 3]

In general this particular wetland system and complex, including their buffers, serves to:

1. Conserve, protect and restore the environmental factors and functions that add to the quality of life for residents of the City of Westport, Grays Harbor County and the State of Washington.
2. Protect the public against avoidable losses from maintenance and replacement of public facilities, property damage, costs of publicly subsidizing mitigation of avoidable impacts, and costs for public emergency rescue and relief operations.
3. Preserve and provide habitat, water quality and water quantity functions.
4. Help to buffer and/or avoid potential damage due to geological hazards or flooding and maintain natural flood controls and stormwater storage.
5. Provide and preserve groundwater recharge and prevent contamination of groundwater.
6. Help prevent cumulative adverse environmental impacts to water, wetlands, fish and wildlife habitats, frequently flooded areas, geologically hazardous areas and aquifer recharge areas.
7. Maintain and restore the chemical, physical and biological integrity of the waters of the United States, the State of Washington, Grays Harbor County and the City of Westport.

- The Pew Charitable Trust recently hosted a webinar and discussed "Blue Carbon Data in the US" (2022). When asked about the conversion of interdunal wetlands into a golf course, they pointed out that "…Methane emissions will decrease and even reverse when the wetland is converted to upland, so the disturbance would have a climate benefit from that narrow perspective. However, conversion would also cause the loss of soil carbon and tree carbon, which would be bad for climate. The net effect on greenhouse gases would take some work to understand, but if the site is on a salty estuary conversion could cause an overall increase in emissions of greenhouse gases. A paper that adds up the soil carbon and tree carbon impacts is Smith, A.J. and Kirwan, M.L. (2021). Sea level-driven marsh migration results in rapid net loss of carbon. Geophysical Research Letters, 48, e2021GL092420. https://doi.org/10.1029/2021GL092420" (Private email communication with Alex Clayton, Principal Associate, Conserving Marine Line in the U.S., The Pew Charitable Trusts).

III. Coastal Economy and Fishery Resources

- The estuary supports a significant aquaculture industry that contributes to the economic base of the County. Salmon fishing, crabbing, commercial offshore and inshore vessels, processing plants and charter boats provide over 5,500 jobs. Grays Harbor Bay and Willapa Bay produce approximately 3.6 million pounds of oysters generating revenues exceeding $20 million.
- Shellfish aquaculture plays an important role in domestic seafood production. Washington State is the largest producer of hatchery-reared and farmed shellfish in the U.S., with more than 300 farms accounting for 25% of the total domestic production by weight, and an annual farmgate value exceeding $108 million.
- One of the most important commercial fisheries in Washington, the commercial Dungeness crab fishery has an average (1990-2002) ex-vessel value of approximately $19.9 million. The 2024/2025 current landings through March 10th of this year are already at ex-vessel value $68.3 million. There are 223 Washington coastal commercial Dungeness crab license holders with approximately 200 fishers who are active participants in this highly competitive fishery.
- Westport is 13th in the nation for seafood landings with over 100 million pounds landed annually. This supports five seafood processors, and 200 independent businesses. Westport-landed seafood supplies more than 85 countries around the world (POGH slide show Westport Council Meeting May 12, 2025). Processing of this seafood requires significant quantities of water.
- Coastal wetlands contribute an estimated $5,000,000,000 to the production of fish and shellfish in the United States coastal waters. Yet, 50 percent of the Nation's coastal wetlands have been destroyed, and this proposal suggests a further likely decline in the near future.

IV. Water Quality and Pollution Concerns

- These fisheries and seafood industries are directly affected by water pollution. Presently, the State Department of Health has established a decertification line that stretches across Grays Harbor Bay at approximately midpoint. All waterways and tidelands east of that line to the Chehalis River are "decertified" and not available for direct oyster or shellfish harvesting due to cumulative adverse impacts to water quality.

- In addition, whenever Aberdeen, Hoquiam, or Cosmopolis Wastewater Treatment Plants (WWTPs) bypass more than a million gallons of raw sewage (during storm events), the oyster beds are closed for one to two weeks. Of considerable concern to the existing aquaculture industry is the possibility that the decertification line would be moved further West or be so impacted from development from the West, that further lands would be taken out of production. The Department of Health shuts down the Oystergrowers to commercial harvesting whenever the fecal coliform rate of sampled water is more than 14 colonies per 100/mg. The threshold for other activities is one hundred (100) colonies.
- The waters of Grays Harbor Bay and the lower Chehalis River basin are imperiled and have previously been added to the EPA 303(d) list for fecal coliform. At present, this is primarily due to the point pollution caused by the wastewater treatment plants of Aberdeen, Hoquiam, and Cosmopolis and the industrial outfalls from pulp and paper industries. The unnamed Westport creek (locally referred to as Winter Creek) was part of the Grays Harbor Fecal Coliform Total Maximum Daily Load Study (TMDL Study, Nov. 2004, 04-10-065).
- Water quality measurements were made at a location between Second and Sprague Streets. It was determined that it would require a 92% reduction of fecal coliform in order to meet water quality standards. "Winter Creek" is in close proximity to the interconnecting wetlands of the subject property and the Westport Light State Park a destination resort could be greatly affected. All of this would have considerable effect on the southwestern Washington coast.
- Land uses in the coastal zone, and the uses of adjacent lands which drain into the coastal zone, may significantly affect the quality of coastal waters and habitats, and efforts to control coastal water pollution from land use activities must be improved.
- There is a clear link between water quality and land use activities along the shore. Coastal and shoreline planning and development control measures are essential to protect water quality. Richard Horner and Christopher May ("Watershed Urbanization and the Decline of Salmon in the Puget Sound Streams", Salmon in the City 1998 conference proceedings p.22) point out that "at very low levels of development there appears to be a rapid decline in biological integrity as well as the physical habitat conditions necessary to support natural biological diversity and complexity." They cautioned that when as little as 5% of a local watershed was covered with an impervious cover, key salmon habitat is lost.
- The Pacific States Marine Fisheries Commission in Status and Future of Salmon of Western Oregon and Northern California: Overview of Findings and Options by Botkin, Cummins, Dunne, Regier, Simpson, Sobel, and Talbot, list the following components as some of the factors for causing the salmon decline: urbanization; agricultural practices; loss of streamside vegetation and functions; pesticide exposure; industrial pollutants exposure; estuary degradation and habitat area loss. The Summary concludes that environmental regulatory issues will continue to be enforced and result in further "reductions in both fishing quotas and timber harvest(s)…."
- We appreciate that the DEIS recognizes that the mowing, irrigation, cultivation and use of pesticides, herbicides and fertilizers will have impacts to water quality, wetlands, soils, wildlife habitat and human health. The solutions offered by the DEIS are Best Management Practices (BMP), Integrated Pest Management (IPM) and a Natural Resource Management Plan (NRMP). These practices are common in golf courses throughout the Seattle and Portland Metropolitan areas. However, they have significant failures to the protection of human health, safety and welfare and wildlife protection, including ESA threatened or endangered species.
- Dr. Nathaniel Scholz of the National Oceanic and Atmospheric Administration/National Marine Fisheries Service (NOAA/NMFS) presented a paper at the "Agriculture and Water Quality in the Pacific Northwest" conference in Eugene, Oregon October 24 and 25, 2000. NMFS, through its Northwest Fisheries Science Center in Seattle, has been investigating the sublethal effects of common pesticides, especially diazinon, on various salmonid species. Much of this research has centered upon the salmon olfactory nervous system-that is, the salmon "nose." This organ is extremely sensitive.
- Many important salmon behaviors appear to be triggered by olfactory cues, including predator recognition, reproductive activities, and homing ability. Pesticides routinely detected in Northwest waters have been shown, at certain concentrations, to affect salmonid olfactory sensitivity, therefore the implication is that behaviors directly related to species survival can be adversely impacted by pesticide residues.
- We are told that Westport Golf Links (WGL) intends to implement a Natural Resource Management Plan (NRMP) as provided by Audubon International (not associated with the Audubon Society), however the specifics of the plan eluded to appear to be placeholders and provide no information other than heading titles. This does not allow analysis of a critical part of the proposal, without this information we cannot concur that "impacts are not expected to be significant."

V. Hydrology and Geology

- The establishment of a golf course in the interdunal wetland system will significantly change the hydrology and water transport of the area.
- Compaction of soils changes hydrologic periods. The DEIS states that the soils are primarily deep sand deposited by wind and wave action from the Pacific Ocean. In order to layout the golf course, tees, fairways, greens and connecting pathways will be constructed. This will mean that all areas of potential play, including the fairways will require that the surface will be compacted. Compaction will be necessary to support mowing apparatus and walking from one hole to the next.
- Volume III - Hydrologic Analysis and Flow Control Design Page 19 Department of Ecology Stormwater Manual uses the following standard: For all wetlands, all zones, the entire year, vegetation species richness decreases if
    1. There is a post-development mean annual or mean monthly water level fluctuation (WLF) increase of greater than 5 cm (0.16 ft) and the predevelopment WLF is greater than 15 cm (0.49 ft), or
    2. There is a post-development mean annual or mean monthly water level fluctuation (WLF) increase to greater than 20 cm (0.66 ft) and the predevelopment WLF is less than or equal to 15 cm (0.49 ft), or
    3. The average annual number of stage excursions greater than 15 cm (0.49 ft) exceeds six, or
    4. The duration of any one stage excursion exceeding 15 cm (0.49 ft) exceeds 72 hours, or
    5. The total change (increase or decrease) in the wetland's dry period exceeds 2 weeks (336 hours) in any one year. For all wetlands with amphibians for the period of 1 February through 31 May, breeding success declines if any one stage excursion exceeds 8 cm (0.26 ft) for 24 hours in any 30-day period. Water level fluctuation is defined as the peak water level minus the average water level. Stage excursion is defined as the change in water level from predeveloped to developed conditions.
- Topography of the area notes that elevations at the site range from sea level to approximately 20 feet, with 8 to 12 feet normal tides. In addition, it is noted that the site is generally flat with an overall slope of approximately 0 to 3 percent. The project proposal states that there would be a minimal alteration to the existing contours of the site. A site map which includes land contours should be included for proper analysis of topographical impacts.
- Stratigraphy is a description of the layering of geologic formations found beneath a point of interest. Over geologic time, many processes occur that result in the formation of this surface and subsurface. During some stages of history, deposition occurs, adding new layers to the already present earth materials. At other times, erosional processes remove materials from the earth's surface. The record of such encountered layers at a given point is commonly referred to as the stratigraphy for that point.

VI. Sea Level Rise and Erosion

- Because global warming may result in a substantial sea level rise with serious adverse effects in the coastal zone, coastal states must anticipate and plan for such an occurrence. According to the proponent's consultants, sea level rise would have a deleterious erosion effect on the project as early as 2030.
- A breach at Half Moon Bay appears to be imminent in the near future. A visit to the area of the 1993 blow out shows significant erosion and the scarp on the ocean side is quite dramatic. Erosion in the Westport area has required over $12 million in repairs.
- While none of the Alternatives gives specifics of footprint or setbacks it is well documented that foundations of buildings have the effect of fixing the forebeach, an action which in high energy areas often exacerbates erosion and causes scouring of the area in front.
- WSPRC Critical Areas Policy 73.03-1 states that "The first and generally preferred agency response to a threat by a natural land change process, such as landslides or coastal erosion, shall be retreat from that threat rather than construction of protective measures."
- This section makes a valid statement: "Past experience has indicated that development along the shoreline can alter erosion and deposition processes."
- Physical oceanographic changes, for example, upwelling rates and sea surface temperatures will impact the coastal zone and possibly alter the productivity of coastal systems and ecosystems.
- A November 1999 conference in Bonn, Germany reported the effects of the rise of temperature and water to several of the islands in the South Pacific. In Tonga for example, the rise in sea levels has already contaminated the drinking water supply of the central and northern islands. That, along with frequent drought, has required the shipment of drinking water to the islands for two years. Strong winds and saltwater spray have cut agricultural production and warming waters have affected fish supplies. The erosion of the beaches has created the most physical loss to the natural tourist amenities. Similar stories from the Inuit of Alaska indicate that ice caps are melting and will cause a rise in the ocean level.

VII. Geological Hazards (Earthquakes and Tsunamis)

- Brian Atwater is cited as pointing out that the Cascadia Subduction Zone produces large earthquakes.
- However, the DEIS minimizes this by reporting that the "…clubhouse and putting course is identified on a

WDNR Tsunami Evacuation Walk-Times map as a post-tsunami assembly area."

- A more accurate appraisal of Atwater's study follows, it is taken from the abstract of a speech he gave on Earthquakes and Tsunamis.
- Geologic evidence found after 1985 shows that the Cascadia subduction zone has repeatedly produced earthquakes of magnitude 8 or larger (great earthquakes). The earthquakes happen infrequently, at intervals that average about 500 years. Along the coast of southern Washington State, for example, seven great earthquakes (or series of great earthquakes) have occurred at irregular intervals in the past 3500 years. Each of these seven events may represent either a rupture of most of the length of the subduction zone or a swift series of smaller ruptures. The most recent great Cascadia earthquake (or series) caused land to subside at bays and river mouths along at least 900 km of the subduction zone. Tree-ring dating shows that the subsidence occurred sometime between August 1699 and May 1700 at four estuaries in southern Washington. The earthquake responsible for this subsidence probably accounts for a tsunami that is known from written records to have struck Japan in January 1700. (source: http://www.vancouver.wsu.edu/programs/sci/speakers.htm). 3.2.1 Geology Global warming and sea rises are the subject of considerable discussion internationally.

VIII. Wildlife and Habitat Impacts

- The DEIS reports that human activity and habitat loss due to vegetation removal could impact olive-sided flycatchers, rufous hummingbirds, and bald eagles. It cautions, for example that the habitat used by rufous hummingbirds and olive-sided flycatchers would be reduced by 50%. See the attached literature review from Audubon Washington staff (RUHU and OSFL Overview.docx).
- The altering of landforms, lighting and increased human use over the approximately 192 - 224 acres of developed land will have significant impact to wildlife.
- This may interfere with and/or limit fish, shellfish, waterfowl and plants presently relied upon by the Quinault Peoples for subsistence and Ceremonial purposes.
- Many of the birds that visit the ocean beaches of Westport Light Park and Half Moon Bay come from all over the world.
- Broad spectrum pesticides can also kill or injure birds by interfering with their food source. Waterfowl that feed on aquatic insects and other insectivorous birds, including nestlings can be fatally affected by chemical applications. Crane fly larvae are often a favorite meal for the frequent wetland visitor, the Red-Shafted Northern Flicker.
- A recent birding field trip by Grays Harbor Audubon Society (GHAS) on the Westport Light Trail in Westport, Washington was reported to eBird.org where 46 species were observed https://ebird.org/checklist/S170871827

IX. Environmental Review Process and Concerns with DEIS

- The DEIS is woefully inadequate in its description of the impacts from all alternatives. There is no "preferred" alternative identified or selected. Thus, the reader is not provided sufficient information to help them make an informed decision on the significant impacts the project could have on all aspects of the human environment that the DEIS addresses. Will it appropriate 224 acres of public land, or 192 acres of public land held in the public trust? Will it be 181-acre bird habitat loss under Alternative I or 162 acres of loss under Alternative II?
- The No Action Alternative analysis is self-serving and does not address the intent of SEPA or its review process.
- WAC 197-11-402 General requirements (10) EIS's shall serve as the means of assessing the environmental impact of proposed agency action, rather than justifying decisions already made.
- WAC 197-11-440 EIS contents (5) Alternatives including the proposed action (b) Reasonable alternatives shall include actions that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation.
- While it is correct to comment that the No Action Alternative would mean that the Westport Golf Links project would not be built, it is totally inappropriate to speculate that the park would degrade into a cesspool of invasive species. The issue of scotch broom was exacerbated by the previous attempt to convert the area into a golf course and shore pines are a native species that are part of the natural progression of the transformation of an interdunal ecosystem.
- Laws which protect the environment are important part of the permitting process. In a May 17, 2023 EIS scoping letter from Knoll Lowney of Smith & Lowney PLLC on behalf of FOGH, he pointed out that the Washington Supreme Court had ruled 9-0 establishing the applicability and strength of the Ocean Resources Management Act (ORMA). However, the DEIS did not mention nor address this powerful law. This offers us the opportunity to assure that long-term survival goals are achieved for generations to come rather than satisfying short-term profit returns for a select group of investors.

- As reported in the DEIS, the SEPA Checklist for the Half Moon Bay project does not list wetlands, however a Settlement Agreement with Surfrider Foundation, Ecology and the Corps of Army Engineers discusses mitigation for the 1.4 acre filling of a roughly 6 acre dunal wetland.
- "Cumulative effects are the combined environmental influences that occur over time and space from a series of similar or related individual actions, contaminants or projects. Although each action may seem to have negligible effects, the combined effect can be severe" (1991 Puget Sound Water Quality Plan, PSWQA). Related concepts of carrying capacity, sustainability and ecosystem health provide a general framework for measuring cumulative effects.
- "Ecosystem health refers to the health of a community of living organisms interacting with one another and with their physical environment. The concept can be applied to communities of different scale or interconnected systems such as streams, wetlands and bays. Changes in ecosystem health can be measured and used as indicators of cumulative effects." (Aquatic Land, Strategic Plan, Washington State Department of Natural Resources, 1992).

X. Historical Context and Population Growth

- It's been only 136 years since President Benjamin Harrison admitted Washington as a state on November 11, 1889. In those 136 years, we've grown from an 1880 census population of 75,116 to a burgeoning population of over 8,059,040.
- Along with that population boom we've seen water degradation due to pollution, salmon population declines because of habitat loss and unwise land use practices, a loss of approximately 50% of the Grays Harbor wetlands, wildlife extinctions and an increased threat to human health and welfare due to inadequate enforcement of existing laws.

XI. Public Access and Traffic Impacts

- Alternatives I or 2 would have significant impact to traffic and traffic patterns. The phasing of the project does not take into account the cumulative effects of the development to traffic, parking and public accessibility. The layout of the proposed development effectively privatizes the beaches of the Pacific Ocean and the waters of Half Moon Bay.
- Jetty Access Road is the main connector from State Route 105 to Westport Light State Park and the South Jetty. The South Jetty and the revetment which hugs the coastline of Half Moon Bay has since its inception experienced frequent problems. These problems have required access to the Jetty by construction trucks and equipment. The present asphalt width of the Jetty Access road is 22 feet. The shoulders are sand areas with some dunal grasses that have been compacted over the years by the thousands of visitors to the Surfing areas of Westhaven State Park and Half Moon Bay.
- Westport Beaches often are fortunate to enjoy the harvesting of razor clams. A clam tide in the Twin Harbors area is known to back up traffic on State Route 105 eastward past Elk River and beyond.

XII. Water Supply and Wastewater Treatment

- Below is a note from the February 8, 2000 Westport City Council Minutes: "Phillips explained his report on Westport's water system production inventory figures. The bottom line, based on the average annual use, is Westport has a reserve of 14.5 million cu. ft. of water per year for future development. This is based upon the wells that are currently online and being used for production of water."
- October 10, 2000 City of Westport Council Minutes: Kitchell reported on a presentation he and Lilja attended on a water reuse treatment system. The proposed developers of the Golf Course/Resort have asked the City about providing a reuse treatment system for their water use. Kitchell stated because the water would be in contact with the public, it has to be treated as a 'Class A' which involves much more thorough treatment than what the City is currently doing (Class B or C).
- According to the Ecology "Orange Book" which is used as the standard for the state with respect to wastewater and wastewater treatment plants: "Class A reclaimed water will at all times be oxidized, coagulated, filtered, and disinfected wastewater. State water reclamation and reuse standards call for Class A reclamation water to be filtered to a turbidity level which does not exceed an average operating turbidity of 2 nephelometric units (NTU), determined monthly, and which does not exceed 5 NTU at any time. Filtration can be achieved by passing oxidized wastewater through natural undisturbed soils or through filter media such as sand or anthracite. Class A reclaimed water must be disinfected such that the median number of total coliform organisms in the wastewater after disinfection does not exceed 2.2 per 100 milliliters, as determined from the bacteriological results of the last seven days for which analyses have been completed, and such that the number of total coliform organisms does not exceed 23 per 100 milliliters in any sample. Class A reclaimed water is currently the only reclaimed water class for which Ecology requires coagulation and filtration. Further, the disinfection requirements for Class A reclaimed water are more stringent than for Class C or D reclaimed water (the disinfection requirements for Class B reclaimed water are identical to those for Class A). Class A reclaimed water must be used where the potential for public exposure is high.

XIII. Health Risks Associated with Golf Course Operations

- Working as a Golf Course Superintendent has been found to significantly increase the risk of dying of four cancer types including - brain cancer, lymphoma (non-Hodgkin's lymphoma, NHL), prostate and large intestine cancer. A study was conducted of 686 deceased members of the Golf Course. An even more recent study has shown that neurological disorders (e.g., Parkinson's, a brain degeneration disorder) has a very high correlation to those within a mile radius of a golf course (https://www.webmd.com/parkinsons-disease/news/20250509/living-near-golf-course-linked-parkinsons).
- Brain cancer rates for the Superintendents was found to occur at over twice the national average, while non-Hodgkin's lymphoma also occurred at over twice the national average. Prostate cancer occurred at nearly 3 times the national average and large intestinal cancer occurred at 1.75 times the national average. The researchers stated that a similar pattern of elevated NHL, brain and prostate cancer mortality along with excess deaths from diseases of the nervous system has been noted previously among other occupational groups exposed to pesticides. (SOURCE: American Journal of Industrial Medicine, 29(5):501-506, 1996).
- Hazards to the public from golfing activities including driving ranges, often require protection devices such as netting or enclosed areas. One that was recently erected on the Whidbey Island Naval Air Station was 50-foot high.
- Golf ball injuries: https://www.golfmonthly.com/news/golf-is-more-dangerous-than-rugby-and-boxing-149987 As well as injuries to the body, each year an estimated 40,000 golfers seek emergency treatment due to head injuries caused by errant golf balls and flying club heads.

XIV. Recreation and Open Space Value

- According to the Master's Program offered at George Mason University in Fairfax, Virginia as listed on February 18, 1999, recreation is a multi-billion dollar revenue producer. It generates over $450 billion for the USDA service alone as the public seeks an increasing shrinking inventory of open space.

XV. Tribal Treaty Rights and Cultural Significance

- The earliest record of human life on the coast of Washington is that of the coastal Indians (WDOE, 1986). Five native American cultures occupied the coast areas...the Makah, Quileute, Hoh, Queets and Quinault" (Olympic Coast Marine Sanctuary, FEIS, p. II-89-90). The Quinault Nation and its members have been ancestral inhabitants and users of the Estuary prior to the first European explorations.
- "The entire area north of Willapa Bay can be considered a usual and customary fishing area for treaty tribes. Salmon and steelhead trout are the most important fishery resources available to the coastal tribes" (Olympic Coast Marine Sanctuary, FEIS p. II-95).

Given the above issues and concerns, we ask the following questions (please refer to the above document):

1) The ponds are dug into the sandy accreted soil and appear to be tidally influenced. Why are these not considered to be associated wetlands?
2) Please discuss how much untreated runoff from the proposed project would be necessary to exceed the threshold of safety?
3) What effect would this untreated runoff have on present users of the project area and describe present water quality monitoring?
4) Given the interconnectivity of the groundwater runoff, what effect would the golf course fertilizers, herbicides, and pesticides have on surfers and other water users of the ocean and Half Moon Bay?
5) If the level sea does rise and/or the wave energy offshore successfully compromises the primary dune separation between the ocean and the golf course, what will be the projected residual water pollution generated from golf course maintenance processes?
6) How will drainage overflows be handled, given that sea level rise will change the freshwater lens of the unlaying groundwater?
7) How will the general public (e.g. bird watchers, dog walkers, wildlife strollers) access safe non wetland areas that are not golf course project controlled?
8) Why was ORMA not considered in the development of the DEIS and how can the project go forward without addressing it?
9) Please define the phrase "Pacific Ocean frontage" and describe frontage property ownership.
10) Who owns the property upon which the walkway is placed?
11) The walkway was paid for with ALEA funds (public generated), what permits or modifications to the grant would be required to change this public amenity?
12) Who owns the property west of the walkway and to the ocean's edge?
13) If a lease is given to develop the project, who will have responsibility for this area?
14) What financial due diligence has been done to satisfy the MOA? Please detail the answer so that the public can be assured that fiscal commitments can be made and support the 80-year lease date.

15) What provisions have been made for the disposition of the leasehold alterations, if the project were to not become financially viable in the future?
16) What restoration provisions have been included in the project analysis if the project no longer was feasible as a golf course?
17) Please explain the extent of the approvals and with whom they would have to be made.
18) Please comment and list the permits that would be required by County rules and regulations.
19) Please discuss the appropriate overlay of such regulations, including zoning, and how each of the these would affect such things as the Grays Harbor Estuary Management Plan (GHEMP) and Grays Harbor Shorelines Management Program to name just two.
20) How will this proposal overlay the principles promulgated by Regional Planning?
21) Why is there no alternative that discusses a reduced size project which considers a 9-hole links style golf course, with a 9-hole short course?
22) What mitigation is planned to offset this 50% loss of hummingbird habitat, and is this contracted?
23) What effect would each alternative have on urbanization; agricultural practices; loss of streamside vegetation and functions; pesticide exposure; industrial pollutants exposure; estuary degradation and habitat area loss?
24) What would be the economic impacts to the fishing and forestry industries?
25) What effect would the urbanization of the Half Moon Bay area have on the water quality to the estuary?
26) What benefit or detriment would urbanization present to the established aquaculture of the area
27) What is the expected water use of the proposed Half Moon Bay Community project and how would that affect the water budget of the City of Westport?
28) How would this cumulative water use of the golf courses, club house, hotel, cabins and above referenced community affect the seafood processing community?
29) Please indicate how parks/open spaces, nature trails, biking trails and/or horseback trails would be inconsistent with the tourist commercial zoning classification?
30) Please indicate how the above uses would be inconsistent with the WSPRC mission and goals?
31) What would be the effect of permanent inundation of coastal areas, beaches, wetlands and estuaries due to sea level rise?
32) What would be the potential to landward shoreline migration?
33) What would be the expected increased erosion rates/events?
34) What would be the expected loss of habitat for migratory birds, fish, shellfish and waterfowl?
35) What would be the increased saltwater intrusion into freshwater aquifers?
36) What would be the potential for landslides and bluff failures due to increased wintertime precipitation, which also may increase the frequency and/or severity of ocean storm events or changes in storm direction?
37) What would be the effect of increased coastal flooding events due to sea level rise, altered hydrological/precipitation cycle (El Nino, La Nina, Global warming, etc.)?
Climate pattern and erosion changes can also directly affect human populations.
38) What would be the effect of increased water-borne health problems to the resort and the City?
39) What would be the effect of contamination of drinking water by saltwater intrusion and how would this residents and visitors?
40) What would be the effect of leaks from underground hazardous materials storage tanks, landfills or sludge composting units with rising water tables in coastal areas?
41) What best management practices have been developed for the application of fertilizers, pesticides and herbicides in an area where the prevailing wind is from the southwest blowing across the Pacific Ocean and into the Westport Peninsula?
42) What protection will be given to the health, welfare and safety of the patrons, other park visitors and nearby residents?
43) What effect will airborne fugitive particles have on the public resources of wetlands, habitat and wildlife?
44) What is the effect of storm surges to the tides in this area?
45) Quantify the amount of surge it would take to over top the primary dune parallel to the cement walkway and the proposed 4th , 7th and 15th holes and what effect would it have on the constructed wetlands?
46) If such a surge and overtopping were to occur, what would be the potential risk to the course, players?
47) What effect would saltwater have on the tees, greens and fairways?

48) What would be the effect of the pollutants from sprays, fungicides, pesticides fertilizers and other chemical to the runoff as it returns to the waters of the ocean and/or the estuary and/or as it absorbs into the wetlands and aquifer?
49) During these wind events considerable sand transports from the southwesterly prevailing winds. How will the sand be removed from the areas of the tees, greens, fairways, connecting trails and wetlands?
50) How and where will these sands be disposed?
51) If there were a breach at that point, who would be responsible for a solution?
52) Who would pay for the solution?
53) If that became an area where the Surf Shack concession were placed nearby, what potential danger would the erosion have to the safety of that amenity
54) Would this require preventative action or would Parks policy of retreat apply?
55) What effect would a rise of the ocean level by 1" have to the Alternatives? Describe its effects to tides and storm surge levels.
56) What will be the effect to the beaches directly in front of the built environment of hotel, convention center, etc.?
57) Walkways ("boardwalks") are planned to encircle the area. To what extent will this become a bulkhead to the transport of sand throughout the changing seasonal deposition?
58) What plans have been considered by the proponent, City, Port, and County to protect marine resources and human life if Alternative I or II is chosen?
59) What are the impacts to public trust and public health and safety if shoreline modification activities are allowed on shorelines that are subject to:
1. Imminent erosion hazards (within 10 years)?
2. Intermediate hazards (within 30 years)?
3. Long-term hazards (within 60 years)?
60) What happens to the beach profile in front of such activities?
61) What is the consequence to clams and other burrowing creatures?
62) What is the consequence to sand beaches? What effect would this have on Tribal interests?.
Water is a significant factor to the success or failure of a golf course. Tees and greens are in particular subject to transpiration losses due to their manicured upkeep.
63) What would be impact to the viability of the golf course if adequate water cannot be provided?
64) If the tees, fairways and greens suffered a drought thereby reducing the playability/attraction of the golf course, what would be the expected loss to hotel, restaurant and other resort amenities?
65) What would be the expected revenues from this resort, if the course were not available?
66) Alternative 1 and II describes how many areas of uplands to be converted to wetlands. What will be the effect of these created wetlands and their interaction with the ground water table?
67) What is the square footage of the created wetlands?
68) How would those created wetlands interact with existing wetlands?
69) What would be affected and how would this effect existing groundwater flow as it runs from south to north and eventually drains into Grays Harbor at the end of the spit?
70) What is the success factor of created wetlands?
71) Will there be monitoring of water quality or other functions to assess "success"?
72) Will there be goals/objectives to meet ecological criteria?
73) What are the dynamics of groundwater in coastal dune systems?
74) What are the interactions of fresh water and saltwater when coastal aquifers are stressed by pumping?
75) What would be the risk of saltwater intrusion to the wellhead under the proposed golf course?
76) What is the influence of surface features on groundwater?
77) What is the effect of changing natural surface features on groundwater?
78) What does best science indicate as the proper sample minimums to identify a single threshold elevation for surface water/groundwater interaction throughout the project site?
79) Many delineated wetlands in close proximity hydrologically or functionally connected?
80) What loss of function can be expected by the isolation of an existing wetland through the change of landscape to accommodate a fairway, green or tee?
81) What is the effect of loss of buffer to a wetland?
82) What is the cumulative effect of the loss of wetlands and loss of buffers to the regional significance of this interdunal wetland system?
83) What is the effect of compaction on the delivery of water to wetlands?
84) What is the effect of compaction on surface water runoff absorption?

85) Some commercial sites and possible maintenance areas appear to be in delineated wetlands? Are these sites included in the wetland calculation?
86) What is the expected water level fluctuation once an Alternative is in place?
87) What plan would be in place to make sure that these minimum guidelines are being met and monitored throughout the construction and post-construction periods?
88) The section contains no discussion of amphibians that may reside, forage and/or reproduce in the area. What amphibians are found on the subject property?
89) What would be the effect of de-watering some of the wetlands to the amphibian population that is customarily found within the wetland?
90) What will be the effect of sand traps and other areas devoid of vegetation to the attraction of birds and other wildlife?
91) Reptiles are common inhabitants of the wetland system and are often attracted areas that hold heat. What would be the attraction of sand traps or other areas, including pathways to reptiles?
92) There is no discussion of the Townsend mole or other burrowing creatures. Soils with high organic content are prime habitat for earthworms, which are the prime foodstuffs for songbirds and the common mole. What control methods will be used for containing the mole population?
93) The effect to habitat appears to be a moving target.. What figure accurately accounts for the amount of wetlands that will be filled, altered or excavated?
94) The Ocean Beaches and Half Moon Bay provide habitat and a resting and/or refueling stop for migratory birds on their way to and from breeding grounds. What would be the anticipated effect of the significant increase of human intrusion into those habitat areas?
95) If competition golf programs are hosted, what effect would gallery noise and activity level have to present residents and how would it effect present wildlife including migratory birds?
96) What effect would these galleries have on wetland buffers and wetlands?
97) What would be the cumulative, direct and indirect impacts? For example, the economic and population growth stimulated by the project may cause its own impacts to the environment. Thus, for each of the impacts discussed listed in WAC 197-11-444, evaluate the impacts of growth. See WAC 197-11-060(4).
98) For the specific section under discussion what would be the cumulative direct and indirect impacts of noise to the development area and the residential and commercial areas in and around the Docks?
99) What would be the expected height of a golf-ball safety net for the driving range and how would it effect wildlife, especially birds?
100) What would be the location of the driving range and how would it effect existing sightlines and views of the water, docks and sunsets?
101) What protection to the general public and wildlife would be provided for those holes located in the area now occupied by the public access walkway between Westhaven and Westport Light State Parks and/or other holes close to other public access?
102) Signs are often used to direct people to various destinations and electric billboards are frequently associated with other activities. What signage is planned to promote the club house, golf course, driving range, restaurant and other activities; where and at what height will they be placed and will they be animated?
103) What will be the effect of the approximately 2,600 front footage primary dune modification on the ocean beach environment, including water runoff, forebeach scour and erosion potential from compacted soils created by tees, fairways, greens and connecting pathways?
104) What is the risk to cultural resources and Treaty rights by the potential loss of the habitat that supports the populations of fish, shellfish and plant communities?
105) If there were a loss of razor clams, for example, because of the modifications of the beach environment (landform and chemical application), who would be liable for the loss of these subsistence, cultural and ceremonial uses of this Treaty right?
106) Mitigation Measures states that if construction encounters prehistoric or historic archaeological materials, construction will stop. Will there be experienced monitors at the site to determine the significance of any findings or will it be left to construction workers and superintendents on a time-schedule to finish the project?
107) What modifications are proposed to this road to accommodate the access to the golf course and surf shack, etc?
108) What effect would this have on surfers and other beach users to park and access the public waters of the Pacific Ocean and Half Moon Bay?
109) Will the Jetty Access Road be widened?

110) Who will bear the initial expense and future maintenance?
111) If a convention, golf tournament, or other significant activity were to happen at the same time, what would be the impact to traffic in the immediate area?
112) If some or all of the above were to happen, what would be the impact and ability of emergency vehicles and personnel to access various parts of the area, such as the beach at the Jetty?
113) Presuming that the built course is of championship caliber and assuming that a championship tournament was staged, what would be the expected attendance to this sort of event?
114) How would this impact traffic, air, noise, water quantity and quality?
115) What would be the impact to wetlands and their buffers if a championship tournament were staged?
116) How many spectators could be expected to attend the tournament?
117) The marine process industries rely on water to produce their water-dependent products. What would be the effect on these industries if the golf course and related developments exceeded the availability demands?
118) What would be the expected cost to the City to install such a Class A reuse water system?
119) What portion of this cost would be borne by the taxpayer?
120) What would be the effect of its high chlorine content, possible low dissolved oxygen and pH on wetlands and grasses?
121) What would be the effect of residual prescription drugs and microplastics on wetlands and golf turf grasses?
122) How would golf course personnel be protected from these risks?
123) How would the public who lived in the immediate area be protected?
124) What would be the effect of stormwater runoff from the associated parking lots on the Bull Trout and other aquatic species that visit and/or use the habitat of Half Moon Bay?
125) What would be the effect of groundwater from the resort and condominiums of Phase I to the same location?
126) If the holes are built at the location of the Park cement walkway, what would be the likelihood of pesticides, fertilizers or herbicides migrating through groundwater runoff. Seeps or other methods to the ocean beaches paralleling these holes?\\
127) What level of toxicity from applications recommended by the NRMP would be necessary to cause mortality in shellfish, such as razor clam?\
128) What site-specific analysis has been done by Audubon International?\
129) What will be the average pounds of pesticides, fertilizers, herbicides expected to be applied to each of the maintained courses?
130) Without the list of actual pesticides, herbicides and fertilizers impacts are difficult to analyze. The USA for example, recognized the serious avian mortality rate as a result of the use of the organochlorine insecticide DDT. While its use has been banned since 1972, the global use has not.
131) What list of birds has been made for the subject property?
132) What list of animals has been made?
133) What is the population of bats on the subject property?
134) What would be the effect of reduced insect availability to birds, animals, reptiles and amphibians? How have you addressed the following cumulative impacts:
135) If Parks can devote all of the non -wetland portion of a State Park to a private user who charges fees for access, what threat does that pose to public use of state parks?
136) If Parks can fill wetlands and destroy buffers on a property it purchased largely to conserve wetlands, what threat does that pose to wetlands and critical areas on state park lands?
137) If Parks can use its purchase of a property to destroy conservation easements on a property, what threat does that pose to the system of protecting wetlands and other critical areas through conservation easements?
138) If Parks can violate conservation easements, what threat does that pose to the system of protecting wetlands and other critical areas through conservation easements?
139) If Parks can justify building new infrastructure in an active erosion zone simply because the inevitable erosion will take more than 25 years, how does that impact Park's erosion policies and what future expenses will be incurred?
140) Given that elements of the golf course project have a usable life of over 50 years, why is Parks measuring the lifecycle of the project based upon the shorter lifetime of the irrigation system?
141) Given that this project includes the non-project action of a rezone, why has Parks limited its alternative analysis to on-site construction?

142) Given that the State of Washington and the City of Westport and at least two former golf course developers found that a golf course can be designed for this property without filling wetlands, why hasn't Parks considered a no-fill alternative?

143) Given that the proposed project includes both the parks and neighboring property that Parks has not yet acquired, why hasn't Parks considered an alternative that uses more or different upland project to reduce wetland impacts and reduce development in the erosion zone?

144) Why doesn't the DEIS consider the potential impact of the multiple public and private restrictions on filling wetlands and destroying buffers on this property, including: (1) shorelines management act and master program; (2) mitigation requirements from the prior shorelines substantial development permit; (3) critical areas ordinance; (4) the Army Corps Covenant; (5) the global settlement agreement regarding the Links at Half Moon Bay project.

145) Why doesn't the DEIS address the Ocean Resources Management Act? How does the project meet ORMA permitting requirements?

146) Given that the last golf course developer on the site became insolvent after illegally destroying wetland and buffers, but before carrying out their restoration obligations, what steps are being taken to ensure that this does not happen again?

147) What efforts are being made to guarantee solvency and the developer's performance of restoration obligations, including in the likely scenario that the golf course proves economically non-viable?

148) How can the public trust this when Parks has concealed all information about the developer from the public?

149) Given the study which indicates that golf courses present a high risk for neurological disorders, under what authority does the Washington Parks have to knowingly expose their visitors to this danger, by converting open space to a golf course?

150) There is a legal action before the Thurston County Superior Court which seeks to enforce wetland protections and restrictions that were associated with the property in a previous golf course attempt. What would be the effect on this present proposal if the plaintiffs were to prevail?

151) According to Golf Monthly *https://www.golfmonthly.com/news/golf-is-more-dangerous-than-rugby-and-boxing-149987* Golf is more dangerous than boxing and rugby. According to the article the latest statistics mentioned that over 40,000 incidents a year occur, some leading to death or severe brain injury. What provisions have been made to protect the public from errant golf ball damage?

152) Who will be liable if there is an errant golf ball injury?

153) Wetland areas are poor choices for development since fill will cause increased flooding of adjacent land. How will this be addressed?

154) Sufficient information has not been provided regarding the present function of the wetlands on the site. What is your analysis regarding this?

155) Why is there is insufficient baseline information on existing wetland functions and how they will be replaced by any proposed mitigation plan?

156) Loss of habitat and degradation of water quality affects the survival abilities of marine organisms, this may be in direct conflict with the Treaty With The Quinault, Etc., 1855, (Olympic Coast National Marine Sanctuary, FEIS/Management Plan, Volume 2: Appendices, pp. D-3,-5). What consideration has been made to honor and insure treaty rights?