

Westport Light Public Comments

July 15 – August 20, 2025

Hello,
Attached is a public comment for Westport Light Planning.

Greetings:

At the Monday, May 12 Westport City Council meeting Westport Golf Links did a presentation on the Draft Environmental Impact Statement. In it, they discussed the financial aspects briefly of Chambers Bay Golf Course in Pierce County as a response to my comment about fiscal aspects of Chambers Bay. I offer this comment to support my assertion (in my public comment at the meeting) that Chambers Bay Golf Course, as of 2019, hasn't made a profit since it opened in 2007.

Chambers Bay Golf Course has historically struggled financially, often operating at a loss despite hosting major events like the 2015 U.S. Open.

Financial History

- 2008: The course reported a profit of \$45,212; however, this was due to a one-time \$930,000 advance from the USGA, with associated costs booked in 2009.
- 2011: Accumulated negative cash flow reached \$3.43 million. A retroactive "in lieu of maintenance" payment of \$3.43 million was made by the sewer utility to the golf course.
- 2015: Hosting the U.S. Open generated significant revenue, with second-quarter net operating income increasing to \$2.2 million from \$103,000 the previous year. However, this was a temporary boost, and the course continued to face financial challenges.
- *Golf course operations have lost an average of \$1M per year (2007-2019)*

Ongoing Challenges

Despite occasional profitable quarters, Chambers Bay has generally required financial support from Pierce County to cover operating deficits. The course's financial viability remains a topic of debate among county officials and residents. I don't have financial information other than the attached past 2019, but a records request would produce what you would need if you wanted more data to study.

They had recently hoped to develop a resort on the site. Unfortunately, the investors

ultimately backed out. The Pierce County document “Chambers Bay Hotel-Resort Ground Lease Agreement” February 2019 indicates in the summary on page 3:

“The golf course has never made money. At the end of 2008, the public was told that the first year of Chamber's Bay operations resulted in a profit of \$45,212. This depiction did not accurately reflect the course operations. The golf course's 2008 financial statement represented a positive cash flow in that amount because a one-time \$930,000 advance from the USGA was booked as 2008 revenue while the associated costs were booked in 2009. By 2011 the accumulated negative cash flow reached \$3,433,175. At the end of 2011 a retroactive "in lieu of maintenance" payment of \$3,431,250 was made by the sewer utility to the golf course.

The County's investment in the Chambers Bay Golf Course is now nearly \$40 Million, exclusive of land. Exhibit A. The \$20.8 Million bond debt has been paid down by \$6 Million. After accounting for debt reduction, golf course operations have lost an average of \$1 Million a year. Unattributed indirect expenses such as depreciation and administrative overhead make the true loss larger.”

The statement clearly says that Chambers Bay, as of 2019, has never made money, *and even excluding debt payments, its operations lose money each year.* The debt just adds to the financial strain. I’ve attached this document and include the link. <https://www.piercecountywa.gov/DocumentCenter/View/79124/Council-information-packet>

The point is, if Chambers Bay can’t make a profit in a region of over a million people within an hour’s drive of the course, how is Westport Golf Links going to fare?

Brandon Dunes Example

Another cautionary tale is comparing Westport Golf Links to Bandon Dunes in Oregon. A true destination course, Bandon Dunes offers six world-class golf courses and multiple high-end dining and lodging options. In addition, there’s a regional airport within 30 minutes of the resort, providing convenient access with regular service to cities like Denver and San Francisco.

I have also learned that the Bandon Dunes area enjoys a ‘banana belt’ microclimate— milder, sunnier, and more stable than the typical Oregon coast weather. Westport can’t reasonably claim a similar climate advantage, further eroding viability of course operations.

What would be the ramifications if the course owners don’t make a profit? What if all three phases of the proposal don’t get built? What guarantees do you have that they will?

The golf course proposal needs to include all aspects including comprehensive financial investigation of proponent access to sufficient funds and guarantees.

I don't know, I'm asking, and I would think parks and the city would ask also.

The longer this MOU continues, the more money proponents are sinking into planning. Expire the MOU now, so Parks can get back to planning a real future for this park.

Sincerely, ¹

After reading the draft EIS. My wife and I are in support of the golf course project. It will be a great use of this park. ²

Hello,

Please include the following as public comment for Westport Light Planning.

Thanks,

In a recent presentation by Westport Golf Links, they informed the Westport City Council that there have been 'zero' errant golf impacts at Chambers Bay Golf in Pierce county. They included this photo:



The photo shows a trail flanked on both sides by 7 to 8-foot tall earth berms, with the golf course situated below.

While this berm design may reduce the likelihood of golf balls straying onto the trail, it introduces other significant issues.

Most notably, the trail loses its views. Currently, the dune trail at Westport Light offers expansive views of the wetlands and forest to the east, and the dunes and ocean to the west. Installing berms to protect the trail would block the views, wouldn't it?

Though much of the trail currently runs without a fairway on the ocean side—where berms likely wouldn’t be installed, preserving those ocean views—the interior views of wetlands and forest would be lost along the rest of the trail.

In the presentation, proponents stated the course would be “engineered” to prevent golf balls from striking the trail. While berming may enhance safety for trail users, I believe it also serves a second purpose: minimizing distractions to golfers from trail activity, which is an important factor in maintaining the quality of the golfing experience.

Proponents imply golf course safety like this is 100% effective. However, given the physics of golf ball flight and the realities of the game, it is unrealistic to expect complete elimination of errant balls.

Moreover, the current course designs do not include detailed plans for berming or other safety features, making it impossible to evaluate how much of the dune trail’s views will be lost.

So the question remains: Will the dune trail views truly be preserved, or will they be lost to berms and other protective structures? ³

Please do not do this. That stretch of coastline has a raw beauty that is difficult to find, and developing it would be a big mistake. Also, why would anyone want to play golf in a place that gets so much damned rain? It just doesn't make sense to develop that land into a golf course, pollute the waterways with all the pesticides to keep the grass pristine, only to have it be empty most of the year due to poor weather conditions. Please be smart about this. ⁴

Hello again,

I have another comment to submit and thought the email format would allow a better outcome than the online form.

Please submit the attached as public comment for the Westport Light Planning.

Thank you,

Financial losses abound with links style coastal golf courses

Besides [Chambers Bay Golf Course](#) not making a profit, and losing about \$1M a year in operations, so too is the fate of Trump International Golf Course in Aberdeen, Scotland. Established in 2012, it has never made a profit.

Below are the full accounts summaries of losses:

2019	2020	2021	2022	2023
(\$1.1M)	(\$1.3M)	(\$700K)	(738K)	(\$1.4M)

2014	2015	2016	2017	2018
(\$1.14M)	(\$1.1M)	(\$1.4M)	(1.25M)	(\$1.1M)
https://find-and-update.company-information.service.gov.uk/company/SC292100/filing-history?page=4				
<p>I thought this would be of interest to you as you lack financial discovery for the proposed golf course at Westport Light State Park. ⁵</p>				
<p>Public Comment: Ecological Value of Westport Light State Park</p> <p>Some proponents of the Westport Golf Links project argue that the ecological value of Westport Light State Park is reduced because the landscape was formed through human influence—specifically the construction of the Grays Harbor jetty and the resulting sand accretion. However, this view is outdated and does not reflect current understanding in coastal science and ecology.</p> <p>While it is true that the park’s dunes and wetlands formed in part as a result of altered sediment dynamics, this does not diminish their present-day ecological importance. Around the world, many wetlands and dune systems have emerged or evolved due to human activities. Despite their origins, these systems now function as critical habitats for wildlife, as buffers against coastal erosion and sea level rise, and as living examples of dynamic coastal processes.</p> <p>Westport Light State Park is no exception. Its dunes and wetlands provide native plant habitat, support migratory birds and other species, and offer essential ecosystem services such as water filtration, flood mitigation, and carbon storage. In a time of accelerating climate change and widespread habitat loss, preserving functioning coastal systems—regardless of how they were formed—is more important than ever.</p> <p>The notion that only “pristine” or ancient landscapes are worthy of protection ignores the resilience and ecological function of evolving systems like Westport Light. Coastal science increasingly values these dynamic environments for their ability to adapt and respond to changing conditions. To dismiss the park’s wetlands because of their human-influenced origin is to overlook their present and future value to both the ecosystem and the public.</p> <p>Rather than converting this unique and still-developing ecosystem into a private golf course, we should manage it for resilience, habitat value, and public benefit. Westport Light State Park deserves protection not in spite of its history, but because of the important ecological role it plays today. ⁶</p>				

Hello,

Please include the attached as public comment for Westport Light Planning.

Review of the Herrera Coastal Processes Discipline Report

The [Herrera Coastal Processes Discipline Report](#) (October 2023) reviews shoreline trends and erosion patterns but fails to evaluate how construction of fairways might alter dune dynamics, disrupt sediment transport, or increase erosion. The DEIS relies heavily on this report.

Setback and Lack of Modeling

The Westport Golf Links design places fairways 200 feet inland from the high water mark. While this distance meets the minimum buffer required under the Shoreline Management Act, it is not based on any site-specific scientific analysis demonstrating its adequacy for long-term coastal stability in this location.

Fairways will be installed within active dune systems, replacing deep-rooted, wind-trapping vegetation—like European beachgrass and dense brush—with shallow-rooted, regularly mowed turfgrass. This fundamental change to root structure, surface height, and ground permeability will compromise the dunes' ability to trap sand and withstand storm surge or wind and rain erosion.



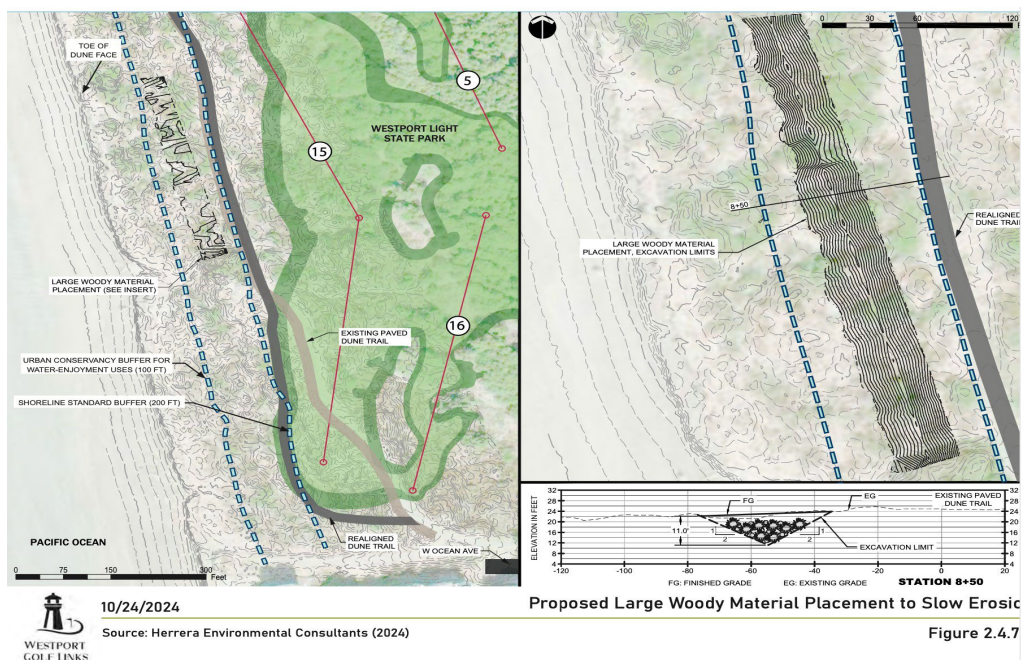
The existing dune trail indicating dune grasses and low-lying dense brush.

Neither the DEIS nor the Herrera report models or analyzes these changes. There is no assessment of how fairway construction, with clearing and contouring of land, might fragment dune continuity, destabilize existing systems, or accelerate erosion both seaward and inland.

Unconventional Mitigation Proposal

The DEIS (Section 2.4.7)¹ claims that the WGL project responds to impacts to coastal processes by “avoiding” them. It then goes on to introduce a novel mitigation scheme: burying 100 to 1,000 pieces of large woody material (LWM) in a trench 10 feet deep, 40 feet wide, and up to 500 feet long, in the dunes landward of the foredune. This trench would be backfilled and replanted with dune vegetation.

This design lacks scientific precedent. The DEIS itself admits the method is “less conventional,” and Herrera² suggests that it may “slow erosion and provide habitat and topographic complexity.” But buried logs do not provide surface habitat or visible topographic benefit, and if erosion reaches them, it will already be too late for effective “adaptive planning.” Standard LWM practices involve placing driftwood on the beach surface—not burying it in fragile dune systems.



The plan for burying large woody material page 2-26 of the DEIS

Most concerning is that this trench is proposed outside of the fairway footprint, closer to the foredune and shoreline, in an area the DEIS refers to as “anticipated construction disturbance.” This is the area from 100’ to 200’ from the high water mark. Why this zone, key to protecting the coast from storm impact, is expected to be damaged during construction is not clearly explained. Instead of avoiding impacts, the project appears to invite them deeper into the protected dune zone.

Broader Impacts on Coastal Processes

Fairways are engineered to be immobile, but dunes require flexibility to shift and rebuild through natural forces. Constraining their movement disrupts the coastal sediment budget. Removing existing vegetation, removing or contouring hummocky topography, and reducing root depth could lead to increased sheet erosion, especially under heavy rain or wind. It is unknown how storm surge will impact areas immediately landward of the foredune with these extensive disturbances.



A map of the proposed golf course design from the DEIS encompassing the entire coastal and interior perimeter of the park. The setback is 200 feet from the high water mark, with construction impacts anticipated to be up to 100 feet from the high water mark.

Over time, this may result in foredunes becoming “sand-starved” and less resilient to tidal and storm events. Siting fairways close to the foredune also raises the likelihood of future dune armoring, further degrading natural processes.

Expert Perspectives and Real-World Lessons

As a non-expert, I rely on published research and real-world examples. [In Coastal Dunes: Ecology and Conservation](#) (Martínez, Psuty, & Lubke, 2008), the authors note: “Stabilization efforts (e.g., planting, landscaping) that restrict sand movement can disrupt the ecological function of dunes and reduce their natural resilience to storms and sea level rise.”

This foundational text explains how human interventions—especially those that reduce dune mobility—undermine the dunes’ natural ability to respond to erosion and rising seas.

A real-world example can be seen at [Montrose Links in Scotland](#), where up to 7 meters of coastline eroded in a single year. In an October 2024 article, course manager Paul Teviotdale explained: “We had to put rock armour around the 2nd tee. Now the sea is coming over the top of that and it’s starting to take away the sand dune.”

This situation shows how even well-known, long-established courses are losing ground—literally—due to worsening coastal erosion. Siting fairways 200 feet from the high water mark, as proposed in Westport, carries real risks that are not speculative, but observable.

Conclusions

Despite offering general context about erosion, the Herrera report and DEIS fail to address the direct impacts of installing fairways within active dune systems. There is no modeling to support the sufficiency of the 200-foot setback, no analysis of how turf conversion alters dune stability, and no precedent for the buried LWM trench. These gaps are significant.

The assumption that fairways and associated construction can be safely located this close to the ocean, without disrupting dune dynamics or exacerbating erosion, is unsupported. Allowing construction impacts within 100 feet of the high water mark—without rigorous site-specific modeling—is particularly indefensible.

The DEIS appears to be structured around promoting the project, rather than objectively evaluating its risks. For these reasons, I urge Washington State Parks to terminate the MOU either immediately or upon completion of the EIS. Advancing the project to permitting would imply endorsement of an incomplete and possibly flawed environmental analysis.

Sincerely ⁷

¹ DEIS Westport Golf Links

Our public lands are not for sale! I am a regular visitor to Westport Light State Park, visiting at all times of year and frequenting the local businesses of Westport while enjoying our beautiful public lands. I am strongly opposed to transforming our public lands into a private playground for the rich. There are very few sandy beaches where people of all incomes and physical abilities can come with their families to enjoy the wildlife, swim, surf, and fish together in the state of Washington. If a golf course is going to be developed, they should look into purchasing private land, not stealing our public resources.⁸

Hello,

Please include this as public comment for the Westport Light Planning.

I hope pdf is a usable format for you, please let me know if not.

Thanks,

Comment Regarding Wetland Impacts, Buffers, and Mitigation in the DEIS

The DEIS outlines proposed onsite mitigation for wetlands, wetland buffers, and preservation. However, based on current regulatory guidance, these measures appear insufficient.

According to [Wetland Mitigation in Washington State – Part 1: Agency Policies and Guidance \(Version 2, 2021\)](#),¹ the following mitigation ratios apply to Category I wetlands in Western Washington:

Category I Wetland Mitigation Ratios (Western Washington Reference)

Mitigation Action	Ratio (Mitigation : Impact)
Reestablishment or Creation	6:1
Rehabilitation	12:1
Preservation (if combined with replacement)	16:1 (typically)
Enhancement Only	24:1

While the mitigation ratios listed in the [Wetland Discipline Report](#) align with the minimum standard guidance in WDOE's 2021 publication, they represent baseline figures. Given the extensive impacts proposed to interdunal wetlands and buffers, combined with uncertain success in dynamic coastal environments, the project should use higher mitigation ratios in accordance with Section 6B of Ecology's guidance, which explicitly allows agencies to raise ratios under conditions like these.

Key Discrepancies

- The DEIS identifies impacts to 43 acres of wetlands and approximately 123 acres of wetland buffers.²
- It proposes a 60-acre mitigation site, which falls far short of the required mitigation acreage.
- For example, wetland creation alone should total ~258 acres (acres × 6:1 ratio).
- Buffer impacts are not adequately addressed or mitigated at all.

Preservation Claims

The DEIS references preservation within the remainder of Westport Light State Park as part of the mitigation strategy. However, the WGL lease area is limited to golf-related activities and structures, not the full park. It is unclear how WGL can claim preservation credit for land it does not manage or lease.

Incomplete DEIS Undermines Review

Many significant issues—including mitigation details—are deferred to future permitting. This undermines the purpose of the DEIS, which should be a comprehensive and credible analysis of the environmental impacts. A DEIS that postpones core evaluations cannot meet the standards of a thorough environmental review.

Request for Action

By allowing the project to proceed to permitting despite these deficiencies, Washington State Parks risks appearing to endorse a flawed Final EIS and compromising its own mission and public trust obligations. I respectfully request that Parks allow the MOU to expire, as this DEIS functions more as a promotional document than a genuine environmental review.

¹ Wetland Mitigation in Washington State - Part 1: Agency Policies and Guidance Page 122 Table 6B-2

² Westport Golf Links Proposal for Westport Light State Park DEIS page 2-23 Project element wetland impacts under Alternative 1 or Alternative 2, Table 2.4.6.1 ⁹

I am commenting here to request that the proposal to build a golf course in Westport is denied. Westport Light State Park is my family's favorite weekend destination in Washington for surfing, bird watching, fishing and family fun. Building a golf course in the park would radically change the environment and spoil what makes that park special for Washingtonians. It is Washington's primary surf beach and one of our most accessible fishing areas. Those two industries must provide more employment than the "300 jobs" that the proposed golf course would provide. Building a golf course would limit the public's ability to use the park and only benefit travelers from a higher income bracket, and that is supposing the golf course is successfully marketed enough to get enough players to come out to Westports remote location. If the golf course is approved but is not successfully built or attended, millions of dollars will be wasted devastating natural

habitat and destroying a beautiful park. It would break my heart to see the state park sell out to developers, please protect our park. ¹⁰

Response to Former State Park Commissioners' Support of Westport Golf Links

Former Washington State Parks Commissioners submitted a public comment in favor of the golf course. While their perspective may carry the weight of past leadership, their general arguments do not hold up under scrutiny.

The proposed 200-acre golf resort—complete with a golf course, driving range, short course, restaurant, maintenance buildings, and more—would occupy the entire shoreline perimeter acreage of Westport Light State Park. This isn't compatible use—it's a full-scale commercial conversion of a public park.

The commissioners describe this as an opportunity to “leverage private funding.” In truth, it's a long-term lease of public land to a private enterprise. Leasing land is far more appealing to investors than buying it outright, especially when the land in question is prime coastal property held in public trust. But let's be clear: private funding does not make this a public benefit. It turns a public park into a pay-to-play business venture.

As former commissioners, they should know that the State Parks' Concession Program supports small-scale commercial activity—like food trucks or equipment rental—operating within parks. Nowhere does the program allow leasing hundreds of acres of a state park to a single commercial operator. Yet this proposal would effectively dominate the entire park, reducing any leftover natural space to mere scenic backgrounds for golfers.

While construction may provide temporary jobs, promised long-term economic impacts are unlikely to be as significant as forecast. Golf here is seasonal—typically May through September—which means it won't provide year-round business support. The broad claims about economic wealth distract from the project's actual scale and consequences.

Commissioners also suggest more people will visit nearby parks, bringing more revenue. However, State Parks' own surveys show that 83% of users prefer hiking and natural areas. In another survey, only 7% supported public golf courses, while 74% prioritized natural spaces. These numbers speak clearly: most people seek access to nature—not manicured fairways and entry fees.

Surprisingly, past Commissioners also claim the project will “restore” damaged land as some of the area was previously harmed by unpermitted development. But this proposal doesn't restore—it redevelops, with pavement, structures, and turf. True restoration focuses on native plants, habitat protection, and wetland recovery.

Perhaps most troubling, the Draft Environmental Impact Statement essentially offered only two options: the golf course proposal or no action. A true alternative could provide planned invasive species removal, add low-impact trails, manage beach access safety and take actions to mitigate fire risk. This is a vision of public stewardship—not commercial development for profit.

Our current Parks Commissioners must act now to stop this proposal. Uphold your mission. Honor your legal and ethical duty to protect public lands. Sustain Westport Light State Park as true stewards of the public trust.

Future generations are depending on your courage and leadership to preserve this irreplaceable coastal landscape—before it's lost forever. ¹¹

I'm curious who to contact to find out when a go / no go decision will be made concerning the golf course project. I'm 100% in favor of this moving forward. I know the public comment period closed last month but wasn't sure of the time frame for a decision and where the info will be posted. Thx much. ¹²

I love to see our parks get well utilized. I don't see how the golf links project would be an improvement to the Westhaven park. One of the joys of visiting there is the abundance of natural life and habitat. A golf course seems to me would diminish that, and reduce the value visitors of the beach and park get by making the experience feel more developed and less of a connection with nature. I also worry about how the development would affect the quality of the wetlands as a natural ecosystem. I am at this time against the golf course. ¹³