

# Westport Light Public Comments

May 19 – June 6, 2025

City of Westport Planning Department  
Tom Cappa, City Administrator  
P.O. Box 505  
Westport, WA 98595  
Washington State Parks and Recreation Commission

Dear Mr. Cappa, Planning Officials, Commissioners, and Washington State Parks, I am writing to express my strong opposition to the proposed Westport Links Golf Course development at Westport Light State Park. This project poses significant environmental, social, and economic risks that are inconsistent with the public trust responsibilities of Washington State Parks and with the City of Westport’s long-term goals for coastal resilience and sustainable land use.

## **1. Escalating Coastal Erosion Threatens the Viability of the Site**

The site proposed for development is demonstrably unstable. AECOM’s shoreline retreat analysis, which accounts for sea level rise and dune erosion, clearly shows that major park assets—including the paved path, parking lot, and restrooms—will be at risk as early as this decade under the High-Risk Scenario, and by the 2030s even under Moderate-Risk conditions. By 2100, projected shoreline retreat ranges from **440 to 1,500 feet**, depending on location and scenario.

Constructing a golf course in such a volatile, erosion-prone zone is reckless. It will almost certainly necessitate hard armoring techniques such as riprap, fundamentally altering the coastline. These interventions will degrade natural processes, damage shoreline habitats, and destroy the scenic beauty and recreational experience that currently draw thousands to Westport Light State Park. Attempting to engineer against nature will not only be costly but ultimately futile.

## **2. Exclusive Use for a Few at the Expense of the Public**

Golf, while a legitimate recreational pursuit, remains a niche activity. As of 2024, just **1.2% of Washington residents** are registered WA Golf members. In stark contrast, Washington’s State Parks are designed to serve the **entire public**, regardless of income level, ability, or recreational preference.

The conversion of a treasured public space into a high-end commercial golf course would restrict access for the majority in order to serve the preferences of a privileged few. Claims that the development would maintain “public access” are misleading. In practice, safety concerns and liability management will require fencing and restricted zones—effectively privatizing the landscape and reducing the freedom of movement and exploration that is core to the public park experience.

## **3. Severe and Irreversible Ecological Damage**

The proposal would destroy or degrade **over 53 acres of wetlands** and **111 acres of critical buffer zones**, impacting nearly **20% of the park's rare interdunal wetland mosaic** and eliminating several sensitive wetland types entirely. These wetlands are not just biologically rich; they are classified as **Category I and II**—the highest levels of ecological significance in Washington State—due to their provision of essential services such as water purification, carbon sequestration, wildlife habitat, and flood attenuation. Turfgrass management is fundamentally incompatible with these ecosystems. Irrigation, fertilizer, herbicides, and pesticides would threaten groundwater quality and disrupt the delicate hydrology of the wetlands. Additionally, the course would fragment critical wildlife corridors and imperil habitat for at-risk species such as the **olive-sided flycatcher**, which relies on intact riparian and wetland areas.

Westport's shoreline has already suffered extensive development impacts. Much of the forested and dune areas outside the park have been cleared. The beachfront is heavily armored, and natural habitat has been severely fragmented. **Westport Light State Park represents one of the last remaining intact coastal ecosystems in the region.** If it is lost to development, so too is the region's last best chance to protect a natural, public shoreline.

Far from enhancing local tourism, this project risks degrading the very ecological and scenic qualities that make Westport a destination. The economic contributions of eco-tourism, wildlife watching, and recreational beach use are likely far more durable and inclusive than those of a golf course that caters to a limited, often transient, clientele.

#### **4. Contradiction of State Park's Mission and Coastal Land Stewardship**

Washington State Parks exist to preserve and protect our state's natural and cultural resources for the benefit of **all people**. The conversion of parkland to private commercial use stands in direct opposition to this mission and sets a dangerous precedent for future land management decisions.

Golf courses already exist in abundance across Washington—many within close driving distance of Westport. There is no justification for sacrificing irreplaceable coastal habitat in a state park when alternative sites exist that do not entail such high ecological and social costs.

Westport Light State Park offers a rare opportunity to invest in **low-impact, inclusive recreation**, environmental education, and ecological restoration—an opportunity that aligns perfectly with state goals for climate resilience, habitat protection, and public wellness.

#### **5. Inadequate and Uncertain Mitigation**

The proposal acknowledges that off-site mitigation will be required for the significant wetland impacts, yet no suitable credits are currently available through the Ocean Shores mitigation bank. This leaves **permittee-responsible mitigation** as the only fallback—an approach well known to underperform, particularly when attempting to replicate complex systems like interdunal wetlands.

No amount of mitigation can truly replace what would be lost. Wetlands take decades, even centuries, to mature. Their functions are dependent on specific hydrological conditions, soil profiles, and biological interactions that cannot be replicated elsewhere

with reliability. The sheer scale and sensitivity of the impacted ecosystems render any mitigation plan speculative at best—and inadequate at worst.

The Westport Links proposal is fundamentally incompatible with the ecological, cultural, and recreational values of Westport Light State Park. It would compromise coastal stability, degrade wetlands, restrict public access, fragment habitat, and prioritize the interests of a small group over the broader public good.

Rather than pursuing short-term economic gain for a few, we should invest in restoration-based alternatives that enhance the park's natural character, increase resilience to climate change, and ensure long-term public benefit.

I urge the City of Westport and the Washington State Parks and Recreation Commission to reject this proposal in favor of a future that reflects the values of stewardship, equity, and sustainability.

Thank you for considering this comment. I speak not only for myself, but for the many Washingtonians who treasure Westport's beaches, dunes, and wetlands—and who wish to see them protected for generations to come.

Sincerely, <sup>1</sup>

Dear City of Westport Planning Committee,

I'm writing to express my strong opposition to the proposed Westport Golf Links development at Westport Light State Park.

As a surfer who frequents Westport and someone who lives in Port Angeles, I care deeply about this stretch of coastline — not just as a visitor, but as a member of the broader coastal community. I have many friends who live in Westport and know how much they value the area's open space, natural beauty, and working-class character. Turning this rare and fragile landscape into a luxury golf resort would damage not only the ecosystem, but also the community that has long called this place home.

The dunes and wetlands at Westport Light State Park are some of the most intact and ecologically important interdunal systems left in Washington. They play a critical role in water filtration, flood mitigation, habitat connectivity, and climate resilience. These wetlands are not just scenic — they're foundational to the health of the coast. Once filled, fragmented, and chemically treated to maintain turfgrass, they will be lost forever. Equally troubling is the privatization of public parkland to create an amenity that caters to a narrow, affluent audience. This project would replace free and open access to a wild coastal ecosystem with paid access to a manicured landscape designed for elite recreation. It would accelerate the gentrification of Westport, pushing it further toward becoming a tourist enclave and out of reach for the working families who have long kept this town vibrant.

The coastline at Westport is one of the last places where people can step out into the wild dunes and experience nature as it is — raw, resilient, and open to all. That is what makes it special. That is what deserves protection.

I urge the City of Westport and its partners to reject this proposal and pursue a vision that preserves the ecological integrity of Westport Light State Park, maintains true public access, and protects the character of this coastal community for generations to come.

Thank you for the opportunity to comment.  
Sincerely, <sup>2</sup>

I am writing to ask the Parks Commissioners to be aware of the important role that State Parks play in protecting some of the precious wild places that remain in Washington State, and providing access to park visitors to be close to those special places.

State agencies like Parks and Department of Natural Resources are responsible for large areas of land in our state, some of which contain the remaining fragments of unique ecosystems. The intent of the SEPA law follows: “In order to carry out the policy set forth in this chapter, it is the continuing responsibility of the state of Washington and all agencies of the state to use all practicable means, consistent with other essential considerations of state policy, to...Fulfill the responsibilities of each generation as trustee of the environment for succeeding generations...The legislature recognizes that each person has a fundamental and inalienable right to a healthful environment.” - excerpt from RCW 43.21C.020

Regarding the proposed golf course by the ocean at Westport: The DETERMINATION OF SIGNIFICANCE (DS) AND REQUEST FOR COMMENTS ON THE SCOPE OF THE ENVIRONMENTAL IMPACT STATEMENT (EIS), issued April 20, 2023, identifies Washington State Parks as the SEPA Co-Lead Agency. The city of Westport is identified as the Nominal Lead Agency. This DETERMINATION OF SIGNIFICANCE document is signed only by the City Administrator of Westport, who is identified on the signature block as the SEPA Responsible Official.

The golf course is proposed on land with a protected wetland. Regardless of the current condition of the wetland, it's location so near the ocean beach makes it rare and ecologically valuable. Wetlands are a part of the functioning biosphere that all earthlings depend on for life.

The protected wetland that is part of the proposed golf course project was deliberately damaged by a golf course developer years ago, and was never restored. I am unsure whether or how that developer was permitted to do that. Regardless of who was responsible, or why the wetland has not been restored as it should have been, these past harms are not a reason to devalue this wetland. A golf course is not the best use of land so close to the ocean.

The City of Westport has been lobbied and persuaded by public relations people who represent the Developer. The City expects to receive substantial taxes as a result of this project. The Developer just wants to make money on a rare ocean view from a golf green. Who is looking out for the important natural systems that can only exist in this narrow area near the ocean? A situation like this is why the SEPA process exists. SEPA Lead roles should not be assigned to municipalities or agencies with financial interest in the project, such as taxes or fees.

A wetland that is near to traffic jams, new paving, new buildings, and golf course turf is

not going to function as this wetland could if it were protected. If this golf course project happens, the character of Lighthouse State Park and the ocean beach near Westport will be lost forever.

What is the role of Washington State Parks in this Westport Golf SEPA process? -- Thank you for considering this question. <sup>3</sup>

I have heard this is bad <sup>4</sup>

Proposal: Westport Golf Links Proposal for Westport Light State Park

Project File Number: 25-COW-EIS-01

[Wgl.wlsp.deis.comments@gmail.com](mailto:Wgl.wlsp.deis.comments@gmail.com)

Cc: City of Westport

Attention Tom Cappa, Sepa Responsible Official

P.O. box 505

Westport, WA 98595

I am a concerned citizen of the county. I am a certified Professional Wetland Scientist (#3764) and hold a WSDA Pesticide Applicator License (#85544). The Westport Lighthouse State Park is one of the few large publicly owned, accessible undeveloped areas that is close to town. The Park is currently used for many purposes such as hiking, mushroom hunting, botanizing, and birdwatching, drawing recreationalists of all kinds locally and from all over the world (multi-purpose). The wide sandy beaches are dangerous for walking due to inattentive drivers, which makes this park/beach more appealing. A golf course would severely restrict these myriads of uses, and only draw golfers to Westport Golf Links (WGL)(though adding a purpose, a single purpose, at the expense of significantly degrading the other uses). The Park also provides critical habitat species that not only live here, but form the identity of our county. For these and many other reasons, I have the following questions and comments on the DEIS.

- In the opinion of a professional Lichenologist, there would be a net loss of rare lichen populations within the Park under the first two alternatives. How would the Active Mitigation Area have the potential to benefit rare lichen populations? Lichens take a long time to establish, and are easily disturbed/destroyed.
- 35-43 acres of this type of category 1 coastal wetland loss is virtually not mitigatable. The proposed creation of a 30 acre "category 1" wetland in the proposed Active Mitigation Area would be surrounded by the course, and would be a lower quality than present. How would this meet the 10:1 or 20:1 mitigation guidance? How likely is Ecology/Corps to approve out of kind mitigation for cat1 coastal wetland off site and can you provide some examples?
- The restrictive covenant process must be a contingency, not a "work with WSPRC at a later time to detail protective measures in the lease agreement" otherwise this statement is meaningless.
- The constraint of not having any in-kind mitigation options for the wetland impacts is evidence to the fact that this is one of the last undeveloped natural areas on the pacific northwest coast and should be preserved

- Is there already a conservation easement/covenant on the or a portion of the property as a result of the court case with friends of Grays Harbor court and Washington Environmental Council case No. 34113-1-II?
- Regarding the discussion of the State Shoreline Hearings Board cumulative impacts analysis for review of a shoreline conditional use permit application: Whether WGL would be a first of its kind in the area; The Ocean Shores golf course is within walking distance of the shoreline. Why is WGL and its location so minimized in the study despite being located in a very similar natural location as the Ocean Shores Course? Why is this not considered? Would WGL be in competition for business? I disagree that WGL would be the first of its kind due to the fact that the parcel is adjacent to the beach rather than a short <5min walk from the beach as with the Ocean Shores course.
- If golfers are expected to travel from the Seattle or Portland areas or farther, what will set WGL apart from those such as Grays Harbor Country club golf course, Highland Golf Course, Ocean Shores golf course, and in Oregon, Astoria golf and country club, Highlands Golf club which are both also right on the beach? There is not a need to disturb documented state sensitive habitat on publicly owned land for additional golf courses. The environmental impacts outweigh the benefit the Park is currently providing to society.
- Golfing is a hobby of a very few people on the harbor, mainly those of a higher income bracket. If built, the course would attract similarly high income individuals. These visitors would not raise the average income of people on the harbor because there would be low wage service jobs created to cater to the visitors. The county does not need “up to 50-60” additional seasonal minimum wage jobs. I disagree that there will not be significant unavoidable impacts from the projected daily 540 visitors at full build out in the form of population and employment. Is WGL only reliant on the Half moon Bay master plan to house these individuals? This is outside of the scope of the project because it is part of the city of Westport’s master plan. Are there other “reasonable foreseeable actions” that are not mentioned in the report that could benefit from or be impacted by the development of WGL? i.e. if I owned a single family residence, or were thinking of building one adjacent to the park, I would not appreciate a golf course or associated amenities/facilities and traffic additional traffic being constructed nearby in what was once a wetland. People are messy, and often show a disregard for safety, laws, and cleanliness. The economic impact study is wildly optimistic. The tourism industry is seasonal, and significantly drops off during the fall/winter months. Is there a more up to date and realistic economic impact analysis available?
- In the Active Mitigation Area one goal is to create conditions such as habitat connectivity. Does this refer to habitat within the area? Habitat is already

connected withing these areas at present. The course itself would encompass the entirety of the interior of the site and therefor with either of the proposed mitigation areas there should be no mention of an increase in habitat connectivity as a part of this proposal. Are there other areas that are not mentioned where habitat connectivity would actually be improved?

- “State Parks is to *“identify, protect, and promote the recovery” of Element Occurrences, as identified by the Washington Natural Heritage Program.* “ How is allowing filling 12 – 15% of wetlands on the site, clearing approximately 130 to 146 acres of vegetation, and installing a golf course compatible with this goal? There are other ways, much less environmentally intrusive ways, of controlling the scotch broom and other noxious weeds on the site in order to protect, restore, and “enhance existing environmental conditions.”
- The Memorandum of Agreement is mentioned several times as an authoritative document in the regulatory policy analysis, and that conditions will be followed. However, the proposal is open to interpretation, specifically in regard to RCW 79A.05.600 through 79A.050.630. One could easily argue that a golf course is inconsistent with preserving the coastal beach for public recreation due to restricting access to the greens, the single use of the course, exclusion of other uses, etc. The Memorandum of Understanding is not provided in the library, please provide a copy of this.
- The statements made in the “Water Quality Impacts ... “ by Envirologic is an industry group published, non-peer reviewed and makes unsubstantiated claims that do not cite actual studies. For example on the last paragraph of pg. 9 “...use of nutrients and pesticides for turfgrass health provides limited to no impacts on water quality of adjacent water bodies.” There is no citation for this claim. There is a reference to a non- peer reviewed industry published article ( Merrick & Thompson 2024) on the environmental benefits of Golf courses. This is primarily in an urban setting, not relevant to the WGL project.
- In several areas, it is stated that it is not yet know if so and so permit will be needed. A 404 permit will be needed. An HPA will be needed. A shoreline Conditional Use Permit will be needed. The DEIS seems to be purposefully omitting discussion of what would be required of these permits for the preferred alternative. Please provide further discussion on the specific permits that are likely to be needed and the additional studies, reports, information that will need to be obtained.
- Waves regularly overtop the existing fordune to the west and north. Will a jetty be constructed to protect or repair the proposed infrastructure when this happens? <sup>5</sup>

Dear Mr. Cappa and WSP colleagues --

Thank you for the opportunity to comment on the Westport Light State Park golf course proposal. I am [name redacted], US citizen and resident of Mason County, a small

business owner, and an occasional golfer. My professional background is a Master's Degree in Coastal Management (University of Newcastle-upon-Tyne, U.K. 1992) with 30 years of work in environmental management, including coastal restoration.

I am opposed to the golf course project as conceived. It is the wrong direction for a wetland and dynamic foreshore area that needs to retain all of its buffering capacity in the face of climate change and further development pressures.

Please let me make three points

1) **State Parks' mandate with respect to 'Critical Areas.** Noting from the DEIS that the area under consideration includes Critical Areas as defined in statute at 70-03-01. By my reading this provides legal guidance to State Parks regarding the filling of wetlands. It cites two specific reasons for the filling of wetlands. The language is:

*...State Parks will ensure its actions do not contribute to a net loss in the acreage or function of the State's wetlands. State Parks will limit construction in, or impacts to, wetlands except where consistent with Commission-adopted park plans...or where necessary to provide access to a significant public interpretive or educational opportunity.*

A golf course does not present a 'public interpretive' or 'educational' opportunity. The proposal for the golf course does not itself constitute a 'park plan'.

2) **Mis-use of 'no action' alternative.** The DEIS assumes a complete transformation of the area, or its complete absence: absolutely no remedial or restorative actions in the area under consideration. Perhaps this is a strict reading of the legal requirement, but it perhaps also violates the 'spirit' of the law, which is to consider alternatives that might be better. Certainly there are both restoration and coastal-resilience activities that could be undertaken that would dramatically improve the ecosystem integrity of the area, with positive knock-on effects for the Westport community. The absence of such consideration is a missed opportunity.

I invite you to visit what we've accomplished in Mason County. There has been spectacular returns of salmon to creeks in the Oakland Bay area following the reversion of an existing nine-hole golf course back into a first class wetland! I previously golfed at the site, and then I was involved in restoring the site -- ripping out English Ivy, building large woody debris areas for creek-channel restoration, etc. Yes, there was active land trust involvement in the Shelton site (I'm pleased to be associated with Capitol Land Trust in Olympia). But there are active land trusts and waterkeepers in the Grays Harbor area that could assist with this effort.

Please invite better consideration of restoration alternatives using coastal resilience, and the proactive investments these represent for the City of Westport, as part of this process.



**3) Highly uncertain as a revenue proposition.** We are given to understand that the conversion of this wetland and the loss of conservation values within the Park is due to a perceived mandate from the legislature to expand revenue opportunities. Looking at other golfing opportunities in the area, and at the demographics associated with golf course use, one has to ask about both the adequacy of the revenue projections associated with the proposed development, and where such a project would stand in relation to the broader mandate of State Parks to be accessible to the broadest range of Washington residents and visitors.

Thank you very much. I have provided my full contact information below. <sup>6</sup>

Dear Commissioners,

I'm writing to express my strong opposition to the proposed Westport Golf Links development at Westport Light State Park. As someone who deeply values this rare and wild coastal landscape, I believe this project poses unacceptable risks to the environment, public access, and the character of the park itself.

This area contains sensitive interdunal wetlands and coastal ecosystems that provide critical habitat, storm protection, and clean water. A golf course would bring construction, pesticide use, and heavy water demand—threatening native species and nearby marine life such as crabs, clams, and mussels that are central to local culture and livelihoods.

Beyond ecological harm, this project would transform a public park into a commercial enterprise catering to a narrow demographic. While marketed as public, golf courses are not equally accessible or inclusive. Meanwhile, thousands of visitors enjoy this park for surfing, fishing, wildlife viewing, and family recreation—uses that would be compromised by privatization and landscape alteration.

Public lands should serve the public good. Westport Light State Park is valued not because of what can be built on it, but because of what it is: a natural refuge on a changing coast. I urge you to reject this development and protect the park for future generations.

Sincerely, <sup>7</sup>

Has the deadline been extended to June 9, 2025? <sup>8</sup>

Hi

Wanted to comment that Strongly oppose the golf course building at Westport light state park. This will poison our land, the plants and animals here, and of course the local waterways and ocean with toxic pollutants from golf course. Residents and visitors to the area enjoy this local resource and there are already enough golf courses for us to use elsewhere. This ecosystems here is fragile. Thank you. <sup>9</sup>

I am against the golf course because I think the city should concentrate its efforts and tax dollars into repairing city roads, completing the STR issue to its inevitable end before

more houses are built in small neighborhoods for the specific reason of making money and not with the best interest of the community they do business in. The issues between the port or grays harbor, the county and the city need to become a priority to reach an agreement on the best use if property within the city limits that also considers the community. Be more cognizant of the needs of the workers (caretakers shall we say of the environment that is Westport) ex. Decent affordable housing for families, the perpetual homeless issues in our area. The enforcement of the municipal codes already in effect. The city needs to be more proactive by considering potential issues arising from influ <sup>10</sup>

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

Attached please find the comments and concerns of Friends of Grays Harbor (FOGH) and others who are deeply concerned about the potential privatization of Westport Light State Park and destruction of Washington State's second largest interdunal wetland mosaic. Attached also is a literature search from Audubon Washington about the Rufous Hummingbird and Olive-sided Flycatcher, whose habitat will be reduced by roughly 50%, if the proposed project were to go forward.

Thank you, <sup>11</sup>

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Thank you, <sup>12</sup>