



Save The Olympic Peninsula

savetheolympicpeninsula.org
P.O. Box 3133, Port Angeles, WA, 98362

January 19, 2021

Washington State Parks and Recreation Commission
P.O. Box 42650
Olympia, WA 98504-2650
Attention: Jessica Logan
Attention: Steve Brand

Via Email to: Commission@parks.wa.gov

Via Email to: SEPA@parks.wa.gov

Via Email to: Steve.Brand@parks.wa.gov

Re: Naval Special Operations Training in Western Washington State

Dear Officials:

Save the Olympic Peninsula (hereinafter STOP) offers the following two comments for your consideration:

1. RCW 79A.05.305, which provides as follows, prohibits you from approving the Navy's proposal:

Declaration of policy—Lands for public park purposes.

The legislature declares that it is the continuing policy of the state of Washington to set aside and manage certain lands within the state for public park purposes. To comply with public park purposes, these lands shall be acquired and managed to:

- (1) Maintain and enhance ecological, aesthetic, and recreational purposes;
- (2) Preserve and maintain mature and old-growth forests containing trees of over ninety years and other unusual ecosystems as natural forests or natural areas, which may also be used for interpretive purposes;
- (3) Protect cultural and historical resources, locations, and artifacts, which may also be used for interpretive purposes;
- (4) Provide a variety of recreational opportunities to the public, including but not limited to use of developed recreation areas, trails, and natural areas.

(5) Preserve and maintain habitat which will protect and promote endangered, threatened, and sensitive plants, endangered, threatened, and sensitive animal species, and habitat beneficial for the feeding, nesting, and reproduction of all pollinators, including honey bees; and

(6) Encourage public participation in the formulation and implementation of park policies and programs.

Permitting military combat exercises is not "managing" park property to "enhance ecological, aesthetic, and recreational purposes" as required by sub-section (1) of RCW 79A.05.305, nor does it meet or further the requirements of the remaining five sub-sections of that statute.¹

2. The proposal would further erode our national security by contributing to the concept that military aggression is proper throughout our society and in the most hallowed locations - which concept was tragically on display on January 6, 2021, at the United States Capitol in Washington, D.C. Now is the time to start limiting that concept by telling the United States Navy that Washington State Parks are no place for its war games.

The assertion at <https://parks.state.wa.us/1168/Navy-training-proposal> that State Parks has the authority to permit this use is totally without merit. One of the two statutory provisions referenced there, RCW 79A.05.030(1), says nothing in that regard.² The other statutory provision referenced there, RCW 79A.05.070, actually reinforces STOP's position that RCW 79A.05.305 prohibits you from approving the Navy's proposal because an action of the Commission, not surprisingly, is required by RCW 79A.05.070(4) to "carry out the objectives and responsibilities of this chapter." The overriding "objectives and responsibilities of this chapter" are enumerated in RCW 79A.05.305. Nothing in the Navy's proposal carries out those objectives and responsibilities, chief among them being the obligation and responsibility for all of your actions to "**maintain and enhance** ecological, aesthetic, and recreational purposes."

STOP is a non-profit, public benefit corporation registered in Washington State since June 16, 2015. The undersigned Ronald N. Richards is the Chair of STOP, and he has been designated as its Naval Activities lead.

STOP's purposes include ensuring "the best use of the land, the lakes, and the rivers on, and the skies above, the earth below, and the waters adjoining, the Olympic Peninsula of the State of

¹ There are numerous references in the Environmental Checklist and the Proposed Mitigated Determination of Non-Significance that indicate the proposed activities will detract from, rather than maintain and enhance, the "ecological, aesthetic, and recreational purposes" for which state park properties must be managed. Among these references are admissions that this activity will result in situations where steps must be taken by the Navy to try and prevent injury to the public (see, e.g., Proposed Mitigated Determination of Non-Significance, Paragraph B12, Bullet Point 6) and acknowledgements that the Navy's activities will preempt the public's activities (See, e.g. the Environmental Checklist, page 9, where it is made clear that the Navy would be given exclusive access to an area of Deception Pass State Park, and see, e.g., the Proposed Mitigated Determination of Non-Significance, Paragraph B12, Bullet Point 8, where it is stated the public's vessels may be redirected from the training area or temporarily stopped.)

² RCW 79A.05.030(1) merely provides that the Commission shall "have the care, charge, control, and supervision of all parks and parkways acquired or set aside by the state for park or parkway purposes."

Washington, in order to retain the unique character of the area, protect its environmental qualities, and provide for its enjoyment by generations to come." Through these comments we hope to educate our governmental officials as to why these Naval activities are not consistent with those purposes.³

All the members of STOP's Board of Directors live, work, recreate, hike, fish, or travel in areas of Washington State that will be adversely affected by the proposed Naval activities.

Sincerely,

Ronald N. Richards, Chair,
for Save the Olympic Peninsula
P.O. Box 3133
Port Angeles, WA 98362

³ Historically the Navy has greatly understated the scope of its intended activities in Western Washington, and the resulting impacts, especially in relation to the Naval Air Station Whidbey Island and the Northwest Electronic Warfare Range, both of which have rained havoc on the environment of Whidbey Island, parts of the Olympic Peninsula, and Olympic National Park. See, e.g., STOP's comments at <http://www.savetheolympicpeninsula.org/assets/061119-stop--nwt-draft-supplemental-eis-comments.pdf> . That similar understatements would become evident in relation to the activities for which this permit is sought, if allowed to proceed, is highly likely.