

Navy RPA Comments- through 12/18/2020

<p>I object to the Navy's proposal to use our State Parks for training. There are serious problems with the proposal. Allowing the Navy to use our State Parks for training would further militarize our society, taking over a large number of parks (29) for military training. We use our parks for peace, solitude, getting back to nature, getting in tune with our family and ourselves. There is no need to use these spaces. Stop, just stop. This is a terrible idea.</p> <p>I firmly object. This is wrong. Stop.¹</p>
<p>The Navy has and continues to destroy our state and national parks, our homes, environment, wildlife and communities with toxic jet noise and war games.</p> <p>Our State Parks are for us the Citizens, not military war games. Just say no to the Bullish Toxic Navy.²</p>
<p>I OBJECT to the Navy's proposal to use our State Parks for training! There are serious problems with the proposal. Allowing the Navy to use our State Parks for training would further militarize our society, taking over a large number of parks (29) for military training. One of the key responsibilities for civil authorities is to tell the military when enough is enough. Just say NO to using public parks for military training!³</p>
<p>In these days of great division in our civil society, we don't need stealthy men in camo uniforms toting toy guns around our State and County Parks. People frequent parks to escape tension, not to encounter more. Keep the Navy commando training out of our parks!⁴</p>
<p>Please don't let the military train in our parks.⁵</p>
<p>I am vehemently opposed to allowing military training in our 29 public parks. This practice is absolutely in opposition with the mission and regulations of our State Park system and puts public safety at risk. The Navy has sufficient land to practice spying with realistic looking weapons without putting actual civilians who are uninformed in harms way. This is ludicrous when weapons are not allowed in our parks! Military training in our public parks does not meet the stated goals for parks to care for state resources and provide recreational access to the public. Please do not allow this proposal to go forward.⁶</p>
<p>I am the daughter of a navy commander from WWII. I am opposed to using our park system for wargames. In addition to the risks posed to frequent walkers, dogs, forest wildlife, and fragile eco-systems, outdoor recreation has become essential for safe activities in the covid19 pandemic. The navy owns property on Indian Island etc with similar land and sea approaches for necessary training.⁷</p>
<p>The Navy has plenty of other places to train, many of them right next to the parks they want to use. This is inconsistent with mission, vision and core values not to mention the regulations of the State Park system and has a real potential for harm. I AM SAYING NO TO USING PUBLIC PARKS FOR MILITARY TRAINING. The people have already said this.⁸</p>
<p>As lifelong residents of Washington state we are against the Navy being allowed to use our state parks for military training purposes. The mission of our state parks is caring for state resources for the recreation of citizens not providing a training ground for military exercises. It is a bad precedent to set. We don't want to be part of an exercise where we are being "spied on" by people carrying "fake" weapons for whatever purpose they conjure up. Please deny this request.⁹</p>
<p>Do not allow Navy training involving unknowing citizens in Washington State Parks!¹⁰</p>
<p>Hello, I strongly object to the Navy's proposal to use our State Parks for training.</p> <p>The state parks are for the benefit and enjoyment of the people and for the care of the natural beauty and wildlife. The Navy's proposal does not meet the standard and needs to be rejected, furthermore:</p> <ul style="list-style-type: none">• Allowing the Navy to use any State Park for training would further militarize our society.• The Navy has plenty of other places to train.

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- There is very real potential for harm to result from the activities the Navy is proposing.
- Trainees will be carrying realistic looking fake weapons. This would clearly be problematic in our parks, where weapons are not allowed.
- Having military training activities in our parks is inconsistent with the mission, vision, and core values of the State Park system.
- Having military training activities in our parks is inconsistent with State Park regulations.¹¹

I don't want this to spoil my time in our state parks. To quote from the assistant director of State Parks, the mission is "to care for state resources and provide recreational access to the public." This proposal does not meet that standard and needs to be rejected. To quote from a letter to the editor: "One of the key responsibilities for civil authorities is to tell the military when enough is enough. It the citizens don't put limits on military activities, expansion will never cease. It is up to us, the citizenry, to take that stand and draw the appropriate line. It is not unpatriotic or disrespectful to set limits on the military – it is our responsibility. Just say NO to using public parks for military training."¹²

I'm writing to let you know of my objection to the Navy's proposal to use our State Parks for training as described by the 2/11/20 article in the South Whidbey Record newspaper. While I would object at any time to the use of our state parks for military practice exercises where the Navy carries apparent weapons and spies on park users, during these times of increased awareness of abuses of power and spread of conspiracy theories, it is reckless and irresponsible. My family was been involved with CERT disaster preparedness practices, and it is possible to carry out practice exercises AND be transparent to the public.¹³

I have just learned that the Navy wants to use our parks for training. I am opposed to this for the following reasons:
The Navy has plenty of other places to train, many of them right next to the parks they want to use. When challenged, they admitted that it was the presence of civilians on whom they could spy that made the parks desirable. Many park users have real and reasonable objections to being spied on. There is very real potential for harm to result from the activities the Navy is proposing. Although the Navy claims to alert park staff and local law enforcement before an activity, in the five years they have used five parks they have never actually done that.
Trainees will be carrying realistic looking fake weapons. This would clearly be problematic in our parks, where weapons are not allowed.
Having military training activities in our parks is inconsistent with the mission, vision, and core values of the State Park system.¹⁴

I object to the use of state parks for navy training. It is the antithesis of the purpose of state parks to allow them to be used for military practice exercises on unaware Washingtonians. Please do not permit this militarization of our great state resource.¹⁵

I am writing to oppose opening state parks to war games of any nature. Parks are where we take our families to enjoy peace and quiet and interact with nature. The very thought of armed military, even if the "arms" are not actual firearms, leaping out of bushes is the very antithesis of a park. Please, do not agree to the pressure from the military to war games in our parks!¹⁶

The state parks are places for recreation, relaxation and tranquility and should be safe and secure. Seeing Military Service Members in battle dress with rubber replicas of assault rifles and other military equipment hiding in the bushes, stalking and observing park visitors IS NOT ACCEPTABLE AND IS DEEPLY DISTURBING. Particularly so for those park visitors with young children. It beggers belief that anyone in a position to allow this situation to occur is even considering it and that we the people have to stand up and object to this in any formal way. The very idea that this could occur in parks that the citizens of Washington State own and are taxed to maintain is unconscionable. THIS MUST NOT BE ALLOWED TO OCCUR.¹⁷

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I object to the Navy's proposal to use our State Parks for training. There are serious problems with the proposal. Allowing the Navy to use our State Parks for training would further militarize our society, taking over a large number of parks (29) for military training. One of the key responsibilities for civil authorities is to tell the military when enough is enough. Just say NO to using public parks for military training.¹⁸

I am writing to voice my opposition to the proposal by the US Navy that they use our State Parks for training purposes. The Navy has no shortage of places to train, while the civilian population relies on our parks to provide safe and peaceful recreation, especially in this time of a raging pandemic. I am horrified that it is even under consideration. I understand that the privacy of park users could be compromised by these exercises and strongly object to that possibility. To quote from the assistant director of State Parks, the mission is "to care for state resources and provide recreational access to the public." This proposal does not meet that standard and needs to be rejected. It goes against everything that our State Parks should stand for.¹⁹

I understand the US Navy has proposed using State Parks for training. As a taxpayer, I am opposed to this use of public recreational space for military training. The 29 parks that the Navy has selected as training sites already have important purposes: to serve as wild spaces for many species of animals and plants, and to serve as recreational and relaxation places for the American people. Particularly during this pandemic, people are under a great deal of stress, and have few safe venues in which to relax and be quiet and private. State Parks provide such spaces, making them even more necessary, at this time. But the activities that the Navy plans to implement would severely curtail the safety and privacy of people utilizing the State Parks. Trainees will be carrying realistic-looking fake weapons, and have admitted that they prefer parklands to the other available lands, nearby, on which they can train, because there are civilians in the parks, upon whom they can spy. How can civilian park visitors feel safe and relaxed in a park, when the Navy could be nearby, carrying what appear to be weapons, and admittedly spying upon us? The Navy claims to alert park staff and local law enforcement before such an activity, but, in the five years they have used five parks for training, they have never done so. The mission of State Parks is "to care for state resources and provide recreational access to the public." Having military training activities in our parks is in direct opposition to this mission, as well as to the vision, core values, and regulations of our State Parks. I strongly urge you to reject the Navy's proposal to permit their training in State Parks.²⁰

I'm the daughter of a Navy veteran and I am writing to express my strong objection to the Navy's proposal to use WA State Parks for their training purposes. Here are some reasons that this proposal is extremely problematic:

- Using public parks during a pandemic to spy on civilians trying to stay safe and partake in outdoor activities is very offensive. Parks users do not deserve this treatment.
- There is very real potential for harm to result from the activities the Navy is proposing. Although the Navy claims to alert park staff and local law enforcement before an activity, in the five years they have used five parks they have never actually done that.
- Trainees will be carrying realistic looking fake weapons. This would clearly be problematic in our parks, where weapons are not allowed.
- Having military training activities in our parks is inconsistent with the regulations, mission, vision, and core values of the State Park systems.²¹

I object to the Navy's proposal to use our State Parks for training. There are serious problems with the proposal.

- State parks are meant for peaceful enjoyment of nature and fun with family and friends. Allowing the Navy to use our State Parks for training would further militarize our society, taking over a large number of parks (29) for military training.

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- Plus, they already have plenty of other places to train, many of them right next to the parks they want to use. When challenged, they admitted that it was the presence of civilians on whom they could spy that made the parks desirable.
- There is very real potential for harm to result from the activities the Navy is proposing. Although the Navy claims to alert park staff and local law enforcement before an activity, in the five years they have used five parks they have never actually done that.
- Trainees will be carrying realistic looking fake weapons. This would clearly be problematic in our parks, where weapons are not allowed.
- Having military training activities in our parks is inconsistent with the mission, vision, and core values of the State Park system.
- Having military training activities in our parks is inconsistent with State Park regulations.

According to the assistant director of State Parks, the mission is “to care for state resources and provide recreational access to the public.” This proposal does not meet that standard and needs to be rejected²²

I do not believe the US Navy should be allowed to use state parks or any state park resources for training purposes.²³

I object to the Navy’s proposal to use our State Parks for training. There are serious problems with the proposal. Allowing the Navy to use our State Parks for training would further militarize our society, taking over a large number of parks (29) for military training. One of the key responsibilities for civil authorities is to tell the military when enough is enough. Just say NO to using public parks for military training.²⁴

Please do not give the USN permission to conduct covert surveillance and training operations against park visitors in our state parks. This will violate laws for state parks prohibiting displaying guns and other weapons, and have disastrous impact on the attempts to preserve habitat and remove invasive species. Our state parks are for the people of this state, paid for by our taxes. USN personnel are of course welcome to relax and recreate at the park, as civilians, along with the rest of us. It is disturbing that there will be no opportunity for public comment or participation in this decision at the meeting on November 19th. Please, consider the wishes of the people of Washington. We are not favorably impressed with the way the USN has treated the people of Whidbey Island. Deception Pass SP is just about unusable when they are doing their low altitude flyovers. I doubt the impact will be minimal if this goes forward.²⁵

Please do NOT allow the military to take over our public parks with military training exercises. This is not the place for these activities. Weapons are not allowed in parks and this would certainly set the wrong impression even if the weapons are not actually real. Especially now, during a time when getting outdoors is difficult, we do not need to encounter military people conducting training exercises in our parks. Please, it is important to keep the military separate from our areas of enjoyment and peaceful environments. Just say NO to public parks being used for military training.²⁶

I am registering my Vehement Opposition to the Navy’s proposal of using our state parks for their military war games! State parks protect precious land, animal, bird, and plant species. They are places people can be in nature for learning, respite, and exercise. The Navy seeks to procure our public park spaces purely for their own use, causing long-term and irreversible damaging affects on our air quality, water quality, flora, fauna, and human populations. I AM AGAINST ANY NAVY USE OF OUR PUBLIC PARK LANDS.²⁷

I live in Newcastle, WA and I am opposed to the Navy’s proposal to use our State Parks for training. Having military training activities in our parks is inconsistent with the mission, vision, and core values of the State Park system and is inconsistent with State Parks regulations. Trainees will be carrying realistic looking fake weapons. This would clearly be problematic in our parks, where weapons are not allowed.

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<p>Although the Navy claims to alert park staff and local law enforcement before an activity there is very real potential for harm to result from the activities the Navy is proposing. Allowing the Navy to use our State Parks for training would further militarize our society, taking over a large number of parks (29) for military training. Civil authorities and the citizens need to put limits on military activities or expansion and draw the appropriate line. It is not unpatriotic or disrespectful to set limits on the military – it is our responsibility. Please say NO to using public parks for military training.²⁸</p>
<p>I object to the Navy or any branch of the military use of State Parks. They have enough special places already to demolish and practice on. Children and families don't need the military breathing down their backs while enjoying OUR parks. They do not need anymore places. They have Crescent Harbor, the beach and forest. They have Rocky Point, the Seaplane Base and so many more places that we cannot use. Leave some special places for those who pay taxes. This is an abuse of power!!!²⁹</p>
<p>No, absolutely NO Navy war games in our near our state parks. The very suggestion is abominable. There are many, many other places in our state where they can train. No. How many ways must I say NO!³⁰</p>
<p>I find it difficult to believe we are having this discussion or that that war games in the parks has actually been ongoing before now. It is childish to fail to take the opinions of park users into account because these simulated war games are so exciting to the perpetrators. I can imagine a childhood trauma that lasts a lifetime as a result of some kid's experience during one of these "games". I would like to have the concession of renting out paint guns to park users so they can "hunt the Seals" while recreating. And I assume those Seals tagged by a paint ball would then fail the course. Are there not coastlines the Navy already controls where these things might happen to those who are already part of the Navy family? This is unacceptable and seems to be an anomaly created during some other time when there was no public notification of these plans.³¹</p>
<p>I'm writing to oppose the Navy's proposal for expanded military training exercises in Washington state parks. They've stated that they intend to covertly observe park visitors, which I'm 100% not okay with, training or not. This simply isn't the kind of country where we need the military secretly watching law-abiding citizens. The Navy has plenty of land of their own that they can use for training without monitoring or otherwise impeding on civilian activities. Let's keep our parks free of military use so everyone can feel comfortable enjoying them.³²</p>
<p>I object to the Navy's proposal to use our State Parks for training. There are serious problems with the proposal. The Navy has plenty of other places to train, many of them right next to the parks they want to use. The Navy claims to alert park staff and local law enforcement before an activity, but in the five years they have used five parks they have never actually done that. Additionally, trainees will be carrying realistic looking fake weapons. As weapons are not allowed in the parks, this is clearly a problem. Finally, having military training activities in our parks is inconsistent with State Park regulations. Please do all you can to prevent the Navy from using our beloved State Parks in this way.³³</p>
<p>I object to the Navy or any branch of the military use of State Parks. They have enough special places already to demolish and practice on. Children and families don't need the military breathing down their backs while enjoying OUR parks. They do not need anymore places. They have Crescent Harbor, the beach and forest. They have Rocky Point, the Seaplane Base and so many more places that we cannot use. Leave some special places for those who pay taxes. This is an abuse of power!!!³⁴</p>
<p>I am opposed to the use of Washington State parks for military training nor activities.³⁵</p>
<p>I object to the Navy's proposal to use our State Parks for training. There are serious problems with the proposal.</p> <ul style="list-style-type: none">• Allowing the Navy to use our State Parks for training would further militarize our society, taking over a large number of parks (29) for military training.

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- The Navy has plenty of other places to train, many of them right next to the parks they want to use. When challenged, they admitted that it was the presence of civilians on whom they could spy that made the parks desirable. Many park users have real and reasonable objections to being spied on.
- There is very real potential for harm to result from the activities the Navy is proposing. Although the Navy claims to alert park staff and local law enforcement before an activity, in the five years they have used five parks they have never actually done that.
- Trainees will be carrying realistic looking fake weapons. This would clearly be problematic in our parks, where weapons are not allowed.
- Having military training activities in our parks is inconsistent with the mission, vision, and core values of the State Park system.
- Having military training activities in our parks is inconsistent with State Park regulations.³⁶

I am wholeheartedly AGAINST allowing the Navy to use our State Parks for covert training. First, it opens a door that can never be closed again; Pandora will be out of the box. Then what? Drones over our picnics? Second, it violates State Park rules about carrying weapons; are we rule-followers or not? Third, it will very likely encourage self-styled "soldiers" who carry their own weapons to come to the parks and try to find the trainees, which--again--violates State Park rules. I cannot emphasize enough what a BAD IDEA this is, on all levels. Please make every effort to keep this from happening. The Navy has plenty of training ground; it doesn't need our Parks.³⁷

I am writing to urge you to deny the Navy proposal to expand use of Washington State Parks for Navy training exercises. The use of parks for military training is inconsistent with the mission, vision, and core values of the State Park system. Allowing military personnel in camouflage carrying realistic-looking fake weapons to hone their covert operations is not consistent with the mission of caring for state resources and providing recreational access to the public. Indeed, it is potentially harmful to the public, and could certainly cause anxiety and fear among users of the parks. Please deny the expanded use of Washington State Parks for military training purposes.³⁸

We recognize that continual training is needed to keep our military sharp and up to date. However, the request by the US Navy to use our Washington State Parks as a practice ground for their training goes against the intended purpose of these special areas. Our parks are designated for recreation, and the locations are preserved by state law by establishing and enforcing protections from any other use. Those of us who frequent our state parks should not be required to share these spaces with military personnel in training, nor subjected to being monitored by the Navy without our permission. We should not be seeing Naval personnel carrying weapons, even if they are fake, on property where weapons are illegal. As a commissioner of our State Park System, our household is looking to you to deny the request by the US Navy to use any of our public parks in Washington State for training purposes. There are plenty of other properties that are available for this use which would not involve violating or temporarily lifting the regulations that have been put place to protect and ensure the intended use of these areas. Thank you for serving as our commissioner by representing the needs and interests of the citizens you serve. Deny the US Navy's request.³⁹

This is a totally crazy idea. It is unsafe and immoral. Don't let this happen.⁴⁰

The navy training does not belong in our parks. They exist for the people to enjoy[.]⁴¹

As a Washington citizen and frequent user of the WA state park system, I'm deeply concerned and disturbed by the Navy SEALs proposal to conduct war training in our state parks. This will adversely impact the ecosystems, as well as the humans - who pay for and enjoy these areas - and as such is completely unacceptable. More importantly, this expansion of US military must be kept in check. It's imperative. The Navy does not have authority to "do whatever it pleases" without the consent and support of the citizenry. Moreover, the lack of transparency and bullying behavior in trying to push this through without a public comment period or government oversight is also unacceptable and deeply

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disturbing. Tell the Navy SEALS the answer is emphatically NO. They have adequate locations to train, and will not impose upon our cherished state parks, beaches and citizens.⁴²

I am strongly opposed to the Navy using public parks for war games. In fact, I can't think of such an idea having any merit. There are multiple places for the Navy to hold their games. Yes, those places might be less convenient! Please tell the Navy to find other locations and preserve our precious public parks for families, pets, children, outdoor recreation.⁴³

I am writing to urge you to unanimously vote "NO" to allowing Navy training in our State Parks. Although it may be tempting from a financial perspective, such a move would be antithetical to the recreation and outdoor enjoyment function that our state parks serve. Seeing uniformed military personnel while enjoying family time in a beautiful setting is not what people expect or want to encounter. Please keep our parks safe for the public to enjoy and vote "NO" on this proposal.⁴⁴

In an article in the Whidbey News times in 2017 there is this quote: "Sheila Murray, Navy Region Northwest Deputy Public Affairs Officer, explained that the training is meant to have no impact on the environment or the public. In fact, members of the public may unwittingly be a part of the training. The intent of the training is to teach trainees the skills needed to avoid detection and to avoid leaving any trace behind during or after the training, according to the Navy. That means conducting operations around the public without the public being aware. Even footprints in the sand will be erased when they leave, Murray said. This kind of training can be invaluable for teams if they have to conduct operations secretly in hostile lands, according to Murray. "The whole point of doing it in populated areas is not to be seen," she said. In any rare instances in which the activity is not compatible with the public, an instructor dressed in "khaki pants and a white T-shirt" will instruct people to stay back, Murray said. This quote clearly indicates the Navy's intention to use the public as "Surveillance Targets." How can the Washington State Parks condone this use of its park patrons?⁴⁵

Military training in State Parks was a bad idea when it was initiated 5 years ago, and it is still a lousy plan. How does this plan meet the State Parks mission of "to care for state resources and provide recreational access to the public"? It does not. Weapons are not allowed in our Parks. Realistic fake weapons could result in accidents, fear, or misunderstanding when alarmed visitors spot them. I have heard from reliable sources that, though the Navy claims to alert Park staff and local law enforcement prior to using the Park, notification hasn't happened. Is this correct? If you don't know, you need to find out. I frequently take friends and my grandchildren hiking in State Parks and I do not want to be spied upon or risk encountering someone with a "realistic" fake weapon. Please DO NOT allow any expansion of military training in State Parks, and I would much prefer that the 5 parks already in use will be withdrawn from this activity.⁴⁶

I respectfully need to object to the US Navy's unfortunate proposal to invade local State Parks for military training. This is a misuse of their power and very sad for the honor of the US Navy. And a misuse of our state parks. Also, use of these beaches this was endangers sensitive habitats and the public trust. These are highly critical areas.

Many of us object to being spied on and pretended to be under attack.

~ Very real potential for harm. The Navy claims to alert park staff and local law enforcement. In the 5 years they have used 5 parks they have never actually done that.

~ Trainees will be carrying realistic looking fake weapons. Not a good look in our parks, where weapons are not allowed.

~ This is inconsistent with the mission, vision, and core values of the State Park system.

~ It's also inconsistent with State Park regulations.

To quote from the assistant director of State Parks, the mission is "to care for state resources and provide recreational access to the public." This proposal does not meet that standard and needs to be rejected.

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Please oppose this action by the Navy.⁴⁷

I am a long-time resident of Whidbey Island. Folks live and visit here to enjoy the amazing surroundings and historical nature of the area, and to get away from their worries as much as they can. Living during a pandemic in a small community has been very hard here as elsewhere in Washington state.

The thought of adding another layer of the “real world” with military training happening around us as my family and we wander in the forests near our home is just too much right now when it’s the one place we can go to catch our breath. Even if it’s only a couple of times a year, it doesn’t matter. The thought that they may be “spying” on us is very stressful. I also imagine our tourists, once they find out, will be less likely to visit Whidbey Island (and the other areas around the other state parks being considered). This could affect our local economy as well as our piece of mind.

I support our military or I wouldn’t have made the choice to move here, but they have other options in areas within or near their bases and not in our parks they can use. Please don’t allow the Navy to use us like guinea pigs. The potential for a deadly mishap is also possible. All of this goes against the mission and the values of our state parks.

Please reject this proposal.⁴⁸

Thank you for your careful stewardship of our Washington State Parks. I very much regret that I cannot appear before you as I did at the Fairgrounds in Monroe, the last time the Navy sought permission to use State Park beaches for under-cover-of-night exercises by its SEALs. I looked forward first to the meeting in Chelan, and after its cancellation, to the meeting at Fort Worden—a most appropriate place to express opposition to the exercises.

I have lived in close proximity to the Fort since 1981, and was the founding President of Friends of Fort Worden, possibly the most successful Friends group among several in the State Park system. We have always held that “Parks are for people” and the notion of restricting access to our shorelines, not only at Fort Worden but at dozens of other Park sites nearby including Fort Townsend, Fort Flagler, and so many other public places where citizens are free to access coastal waters, is foreign and objectionable. The prospective list of practice sites is literally exhaustive—essentially all of the places where four million or more citizens and visitors in Western Washington can walk, recreate, breathe marine air, observe native life forms including birds and marine life, and feel FREE to enjoy the blessing of living here. It’s a wish list rather than a “needs” list.

In these four years since the Navy floated a similar wish list, they have not demonstrated that State Parks are so very different from the existing 50 miles or so of Puget Sound shoreline already under Navy control—places from which the public is excluded under threat of trespassing. Make the Navy prove beyond a doubt that their training exercises can’t be successfully done on existing base shorelines. How does Fort Worden and the other 29 Parks plus other sites, represent a different type of shoreline than what the Navy exclusively controls at INDIAN ISLAND, Bangor, Keyport, Everett, NAS Whidbey, and so on? Our state population continues to grow. State Parks are the pressure-relief location for our increasing millions particularly serving in the fundamental capacity of water and shoreline access. For the Navy to cause that access to be restricted or reduced is simply a violation of community mental and physical health, in conflict with the Constitutional directive to “secure the blessings of liberty...upon our posterity.” Again with reference to Fort Worden, I wish I could show you in person where citizen volunteers, begun by myself in 1993, have worked every year to restore and improve the beach ecology at Point Wilson. In the first summer alone, working in tandem with Park staff under the leadership of Ranger Jim Farmer, we removed 16 flatbed truckloads of invasive Scotch broom, essentially returning that priceless shoreline to its natural ecology in one summer. Each

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successive year we have removed many additional truckloads of similar material. (Scotch broom seeds are known to remain viable in the soil for 40 years, or longer.) We have welcomed many guests, especially young people, into our effort at times like ML King, Jr. holiday work parties—volunteers from many Western Washington counties.

The knowledge that SEAL boots might unwittingly trample over restored littoral wildflowers by dark of night, with no guidance from experienced citizens and no ability to observe their exercises, is not only repellent, but discouraging to volunteers such as ourselves. We have given freely of our time for decades, and made some expense, to cordon off social trails that were beginning to trample near-shore areas, and then watched as those areas began to quite successfully recover their native vegetation. If the public can do that in a respectful way, if the public can observe the Parks leash regulations and not have dogs romping over near-shore areas, why would the Navy be permitted to covertly use the same areas under cover of darkness, unobserved? The surest way to discourage volunteerism would be to not support, to undermine the work that has been accomplished in the past. I fervently hope you will hold the line and just-say-no to the Navy's wish list. Force them to reveal why Parks must be used when Navy already has exclusive access to so many miles of shoreline nearby. Require them to engage with the public to get specific input on what might be damaged ecologically for every yard of Parks shoreline. If these exercises proceed, part of the very reason the public utilizes these shores, will be undermined. The potential damage to the ecology could take decades to repair, and if the practices continued in future seasons, the damage would be perpetual.

Make the Navy prove that national security can only be served by excluding the public from public lands—that security cannot be achieved through practice as the Navy's myriad other exclusive locations.

Again, I so wish that it were again possible to speak in front of you in person! I place my trust in you to feel fully empowered to ask hard questions and say NO if that is where the testimony and evidence leads.⁴⁹

I am against allowing the Navy to use public parks or other spaces for training exercises. Parks are for the public to use for recreation, for wildlife to use as natural open space, for children to explore nature and discover new critters and old growth, for parents to have access to natural areas to teach their children about the value of living in harmony with the natural world, and for seniors and all of us to decompress from the stresses of our lives. If there are military people in the parks, dressed in combat gear, perhaps trying to stay hidden, it completely negates the way parks can be used by ordinary citizens. Many people, especially children and women, might feel threatened and intimidated by military training exercises. Please take in the perspectives of ordinary citizens as you make the decisions on the proposal by the Navy.⁵⁰

This is a hazard for those of us who seek a safe and calming atmosphere in our State Parks. I have been diagnosed with PTSD and have a very severe reaction to frightening situations. Please keep this program to the maximum minimum.⁵¹

NO!⁵²

I just read about a plan to allow the Navy to use our water-adjacent state parks to conduct war games. The article said they would be using realistic-looking weapons, sneaking out of the water, and spending up to 72 hours using park visitors as unwitting targets for surveillance. This is horrifying and not at all what I want for our state parks. People should be able to visit parks without fear, and without being unsuspecting pawns in a military operation. With COVID restrictions, one of the few activities that feels safe for my family is walking/ biking/ hiking in parks. That's what parks are for, not war games.⁵³

As a resident of Port Townsend, I am extremely concerned with what I heard as an attendee in your meeting of 11/19/2020 regarding Navy Seal Training in our State Parks.

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I have been following the Navy's proposed and past activities in this area for some time, and although Rear Admiral Barnett claimed to be offering "the actual truth" as opposed to the "misinformation being passed around by the public", the information you were given by the Admiral was highly flawed and inaccurate.

Most importantly, I heard you say, Commissioner Milner, that you want to be able to look the public in the eye and assure us that the Navy SEAL activities do not involve any surveillance whatsoever. The Admiral claimed that they do not. However, when the Navy first proposed renewing their application for training in the parks, a Navy SEAL trainer stated that the training is specifically for surveillance exercises - to observe the public without being detected, as practice for wartime covert operations. Therefore, either the Admiral or the trainer is poorly informed or was purposely prevaricating. Either way, the lack of truth is shameful.

When Rear Admiral Barnett was queried at your meeting, he said the Alaskan shoreline "is limited in scope", but gave no details. "Scope", however, was previously defined by the trainer (mentioned above) as meaning there are no people there to observe. Considering that the water and shoreline in southwest Alaska are nearly identical to that of the Puget Sound, it seems obvious that this lack of people to observe is what the real reasoning is.

Furthermore, the Rear Admiral stated that the training would only be done at night "when the parks are closed", which is contrary to what the trainer stated: up to 72 hours per exercise. This makes the Navy's communications with you ambiguous and puts into question every assurance they have made or will make.

When asked why they need our State Park beaches, the Rear Admiral said there are certain features of the water and shoreline that are conducive to their needs. He was not specific what those features are. He said that the 46 miles of shoreline the Navy owns in the Puget Sound area is not sufficient. However, it does not take even a few miles of shoreline to conduct these exercises. Obviously the only real reason is because the public is in the parks whereas there is no public to observe on the Navy properties. If diversity of shoreline features is what they seek, they can easily purchase what they need. But again, the public is in the parks.

He also stated that the training supervisors would be dressed in plain clothes so the public they encounter would not suspect anything. However, their Environmental Assessment states that they would be dressed so as to be easily identified, and would inform anyone wandering into the training area that there are exercises going on. So, which is it?

How will parks personnel track the Navy's activities? How will you know if they stay within the areas and times of agreement? In the past, they have made statements and assurances about what they will do - not just verbally but in legal documents - yet they have over-reached substantially. Witness, for instance, the number of Growler jets: an additional 36 were cited in their Environmental Impact Statement, but in actuality they brought in 54 additional jets. They claim those jets are quieter than the Prowler jets used previously, but in fact the Growlers are louder when performing Field Carrier Landing Practice, according to the Navy's own documents. The Navy cannot be trusted to tell the truth about any of their plans or their current activities. At your meeting they stated that they have been training "in water" since the 1980s. If they have been successfully training for that long, why the sudden need for our public lands?

The Admiral stated a few times, as have his predecessors, that the Navy personnel are "part of the local community". They are not. They shop on base, they work on base, and they live here for only about an average of two years. He said, "We are all in this together", but if that were true he would be truthful to you and to the public.

You were assured that the SEALs will never be seen. But these are TRAINEES. By definition, they can make mistakes. It's only a matter of time before they are seen. But in actuality, it doesn't matter whether we see them or not. They will be observing us, and that is unacceptable.

The Admiral said the weapons that the SEALs will be carrying have no firing capability. If a member of the public happens to see one, they have no way to know that. Imagine an unsuspecting person who is legally armed suddenly meets one of these SEALs and doesn't know who he is. There was a tragic occurrence of exactly this kind in North Carolina in 2002. A soldier was killed.

The public is rapidly becoming aware of the Navy's proposed and past training activities in the Parks, and as was so aptly pointed out in your meeting, there is a "creep factor" that tourists and locals are feeling which will preclude their willingness to visit the parks. That alone should alarm you. You cannot adequately assure the public that having covert exercises going on around them in the parks is okay. You seemed to be trying to find ways to make compromises so you can approve the Navy's application, instead of approaching this with skepticism. You've come up with highly complex plans that will be nearly impossible to implement. How will it be possible to ensure that these plans are followed? Do you even have the personnel to do this? Why allow this at all? The Navy does not lack for anything; they are not our poor neighbors. They are taking advantage of you and the public. Please do not grant their application.⁵⁴

So they've already been doing this at five parks and no one noticed. Now they'll spread their activities across 28 parks, thus diluting their potential public contact and environmental impact to virtually zero? Okay.⁵⁵

We are writing on behalf of Skagit Audubon Society to comment on the U.S. Navy's request to conduct Special Operations (SEAL) training in 29 Washington State Parks. Skagit Audubon is the National Audubon chapter focused on Skagit County. Our chapter's 276 member families share an interest in wildlife, particularly but not exclusively birds, and a commitment to protecting and restoring wildlife habitat. We are frequent users of our state parks as locations for birding, hiking, camping, boating, and other activities. Before the onset of the Covid-19 pandemic, we were conducting educational activities throughout the summer at Cama Beach State Park, one of the 29 on the Navy's submitted list, and had been doing so for many years.

Until the Navy's present request to the State Parks Commission we were unaware that the Navy held a 5-year permit to conduct Special Operations training in 5 Washington State Parks, none in Skagit County. We understand that this permit ended in May of this year and that the Commission declined the Navy's request to extend it to the end of the year while agency staff review the matter.

Before offering comments on the Navy's new request for use of 21 parks, we want to emphasize that Skagit Audubon Society fully supports Service Members receiving the training they need. This is something we take very seriously, particularly as some of us have had coworkers who were Navy SEALs, and there are Service veterans both on our chapter's board and in the general membership. We have read the reasoning in the submittals from the Navy for conducting essential training in Washington State Parks (SEPA Environmental Checklist, pdf page 5). We do not find the reasoning convincing.

The Environmental Assessment for this proposal, the application for the particular 29 parks, and the SEPA Checklist total hundreds of pages. In studying the proposal and in the following comments, we focus especially on wildlife, particularly birds, our strongest area of interest and expertise, and on parks in Skagit County, notably Deception Pass State Park. Many of our concerns related to this particular state park also pertain to the other 28 state parks, all of them coastal, in all of which there is the potential for adverse impacts to the nearshore environment, adjacent upland areas, and visitor experience.

1. Why the increase in this request to 29 parks?

We understand that the Navy is looking for variety in the places and types of shoreline and nearshore terrain in its program for training SEALs, but we did not find in the submittals any explanation of why for the last five years, 5 state parks sufficed for this variety, whereas now 29 are needed.

2. The Navy's request is not consistent with the purposes for which the state parks have been established.

We reviewed the mission, vision, and core values statements on the website of the Washington State Parks and Recreation Commission (<https://parks.state.wa.us/176/Mission-vision>). Not surprisingly, we found no reference to, or allowance for, providing a locale for military training as part of what our state parks are about. The Commission's brochure listing the parks states, "All Washington state parks are developed and maintained for the enjoyment of the people."

(<https://parks.state.wa.us/DocumentCenter/View/8616/Washington-State-Parks-Agency-Brochure-PDF>). The Navy's Environmental Assessment and the SEPA Checklist give assurances that the public's use of the state parks will in no way be impaired or interfered with by the proposed SEAL training sessions and that, because remaining undetected is a primary objective of the training, the public is unlikely to even know that Navy personnel are in the area. Taking Deception State Park as an example, we think it very unlikely that in the busiest state park in the system, training that can occur day or night, involving up to 32 people, vehicles, boats, submersibles, and UAV's (Unmanned Aerial Vehicles) will not be noticed by park visitors. A given training session could last up to 72 hours: 3 days (Environmental Assessment, pdf p. 7). Visitors will notice. Some will find it interesting. Others will find that it detracts from the kind of experience natural areas such as Deception Pass State Park and all the state parks have been set aside to ensure to the public.

3. There is real potential for adverse impacts to the federal and state listed Marbled Murrelet.

The proposal's Environmental Assessment mentions there is potential for adverse effects to the Marbled Murrelet, federally listed under the Endangered Species Act as threatened and under Washington State law as endangered. At pdf page 111, the assessment states, "3.3.2.3.4 Special Status Birds: Marbled murrelet (*Brachyramphus marmoratus*) - Marbled murrelets would be expected to fly over terrestrial portions of the training study area to access marine foraging areas; some of these areas may be within the in-water portion of the training study area." The assessment notes that this species is present in all three state park regions with parks among the requested 29. We want to emphasize that Marbled Murrelets are frequently present in the waters immediately offshore of Deception Pass State Park. We regularly see them, for example, from Rosario Head in the northern portion of the park. Training operations both during the day and at night, involving boats, jet skis, and submersibles with acoustic navigation devices will almost certainly interfere with the normal resting and foraging by diving of this rapidly declining seabird. We understand that the proposed training could take place at any hour of the day and continue up to 3 days. Murrelets come and go from their inland nest but spend part of any given day and night on the water. There are, at a minimum, portions of the Deception Pass State Park shoreline where adverse impacts to Marbled Murrelets would be almost guaranteed.

When construction projects or other potential disruptions to Marbled Murrelets are to take place, the normal practice is to hire trained monitors to be present throughout the activity. These monitors are given the authority to stop the disturbance whenever Marbled Murrelets approach within a certain distance of the activity. If the SEAL training simply has to take place around and in Deception Pass State Park or other state parks where murrelets are present, this precautionary system should be put in place.

4. The Real Property Agreement Applications lack specificity, making accurate evaluation of potential effects impossible.

The Navy submitted a Real Property Agreement Application for each of the 29 state parks where it would like to conduct SEAL training, all dated February 12, 2020, and all identical except for the name of the park and the addition of high-angle training in the Deception Pass State Park application (<https://parks.state.wa.us/DocumentCenter/View/15032/Navy-Application>). An accurate assessment of potential impacts to Deception Pass State Park's almost 4,000 acres and over 2 million annual

visitors cannot be made without knowing specifically where along the park's shoreline and adjacent inland areas the training could take place. Without this information, it is not possible to weigh the feasibility of conducting this training without unacceptable effects.

Here are a few examples of the importance of being specific about where training would take place. Goose Rock is an important location for rare plants in Deception Pass State Park. On pdf page 38 of the application for using this park, "Surveillance and Reconnaissance" training is described, involving hiking inland from a beach to a "designated observation post", which we assume could mean a high point in the landscape, such as Goose Rock. The application assures us that this activity will leave absolutely no trace, that being part of the exercise, including no trampled vegetation, no broken branches, etc. Unless the trainees intend to stay on trails, which is nowhere stated and would seem unlikely, we seriously doubt this level of leaving no trace is possible. There are other locations of rare plants in this particular state park probably unknown even to the park staff because this information is closely held to prevent illegal collecting or damage. We recommend strongly that if this training is to take place, each terrestrial location be checked in advance with the RareCare program of the University of Washington and Department of Natural Resources Natural Heritage Program to ensure that rare plants are not destroyed.

5. There are also specific locations that should be avoided to protect birds.

Pigeon Guillemot surveys conducted by Skagit Audubon some years ago documented that the rocky shoreline of Canoe Pass beneath the Canoe Pass Bridge is a particularly important nesting site for this seabird. Training exercises should not take place in that vicinity during the nesting period for this species.

We see that Deception Pass State Park is the one park where the Navy would also like to conduct "High-angle Climbing" to practice negotiating rock faces and cliffs (pdf p.38 of the application). The location of Peregrine Falcon nests is generally privileged information, and we are unable to say for sure if Peregrines presently nest in Deception Pass State Park, but given the quality of the habitat for this bird, there should be no cliff climbing until there is confirmation from Washington Department of Fish & Wildlife that no falcon nests will be disturbed. Our members have noted Peregrine activity over Deception Pass State Park in recent months. While this bird has recovered sufficiently to be removed from the Endangered Species List, it is still fully protected under the federal Migratory Bird Treaty Act. We could give more examples of specific areas of Deception Pass State Park to avoid in order to protect bird species, but these should suffice to show the importance of the training request being specific as to areas within the park.

6. Potential adverse impacts to marine mammals must be specifically examined for each of the proposed 29 state parks.

Harbor seals park their pups on beaches while the mother seal is foraging. Rosario Beach in Deception Pass State Park is one location where pups are present during this activity, and it would be very surprising if the same were not true for some, possibly many, of the other coastal state parks on the Navy's proposed list of training locations. Pupping beaches need to be identified and avoided to not impact this protected species. In 2019 an elephant seal, also protected under the Marine Mammal Protection Act, spent an extended period on Rosario Beach. Before any use of state park beaches for Navy training is permitted, there needs to be a careful study of which beaches marine mammals use and at what times of year so that these areas and times can be avoided. Furthermore, other protected species regularly use the waters off of state parks and would be impacted by the training described. These include Steller's and California sea lions, orcas, harbor and Dall's porpoises, and gray and humpback whales, and more. Potential adverse impacts on all of these protected species need to be carefully considered before any training of the type described is permitted.

7. The use of Unmanned Aerial Vehicles (UAV) should be subject to the rules designed to protect state parks.

The Navy's application materials mention using UAV's as part of the SEAL training, but it is unclear whether this would be at all the proposed state park locations or a subset. Either way, the Navy should comply not only with FAA regulations, as it says it will (Environmental Assessment, pdf p.18), but also with the procedures outlined by the State Parks Commission for use of UAV's in the parks (<https://parks.state.wa.us/DocumentCenter/View/9380/Remote-control-aircraft-permit-instructions-PDF>). The Navy's plan is to use larger, gasoline-powered UAV's as well as smaller, electric-powered types. This offers significant potential for direct and indirect injury to birds as well as auditory disruption to the experience of park visitors. The Environmental Assessment does not analyze these potential impacts in any detail.

Conclusion

Washington Department of Ecology's website notes that, "Washington has about 28,000 miles of shorelines, which is more than the distance around the earth." (<https://ecology.wa.gov/Water-Shorelines/Shoreline-coastal-management/Shoreline-coastal-planning>) A relatively few miles of these shorelines are protected for the public in Washington's state parks. Additional miles are federal property managed by the U.S. Navy and for the most part closed to the general public. Five state parks were being used for SEAL training; now permission for 29 is being requested. If a 5-year permit is granted this time, how many parks will be requested the next? The Navy's submittals state that trainees are flown to Washington State to train here; i.e., the personnel are not based in Washington. This begs the question of why so much of this admittedly very important training must now take place here, including in busy state parks like Deception Pass, when apparently the training formerly took place elsewhere. Training here is convenient in that there are naval bases nearby with support facilities and equipment, but does this convenience to the Navy outweigh protecting the parks and the experience of their visitors? We don't think so. Let this important training take place on lands and shorelines not dedicated to the also important and high purpose of public parks. Our dedicated Service Members will still have the benefit of high quality training and without the constraints necessary in our state parks.

We appreciate your attention to our concerns.⁵⁶

Thank you so much expressing concern about the Navy's proposal to train on public lands. I read about your meeting on Thursday with the commander of Navy Region Northwest, and read that you pushed back against the Navy's plans for Special Operations to train on the beaches of our State Parks.

I am strongly opposed to having the Navy training in our State Parks.

Washington's State Parks should not be used as military training places. The Navy should respect these parks as public places of refuge and respect for nature. Our State Parks are visited by millions of residents and tourists and should be protected as havens of natural beauty. Our parks benefit local communities. If our parks become military training grounds, local businesses will suffer.

I remember in 2016 and 2017 when the Navy wanted to practice warfare in our Washington State Parks. I remember reading the fact sheet for the Proposed Naval Special Operations Training, and I strenuously opposed this use of our State Parks, and wrote many letters to legislators. I remember in 2018 when the Navy proposed increasing Special Operations training in Port Townsend on public lands and along the shores of Puget Sound. I was concerned about damage and stress to marine invertebrates and mammals, birds, and fragile plants. I volunteer regularly to protect our local shores and intertidal zones and to educate the public about the wonders of our marine environment.

I help with beach clean-ups to keep them pristine. I am deeply concerned about the environmental impact from warfare training such as trampling on the eelgrass, seaweeds, marine invertebrates, and juvenile fish. Children would be terrified to see weapons, minisubs, or other war paraphernalia, and I would be, too.

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I spend a lot of time at our State Parks, hiking and enjoying the tranquility and also volunteering for environmental organizations. I really don't want to be terrified by a SEAL training or to travel to these parks to find them closed.

I urge you to continue to block the Navy's proposals for use of our public lands.⁵⁷

As a frequent user of Washington State Parks, I strongly oppose any Naval training exercises in any state park.⁵⁸

I'm a concerned citizen, voicing my opposition to Navy usage of our state parks. With such little regard for the long term effects of the Navy's noise pollution on Whidbey Island's flora, fauna, and mental health of our local residents, I cannot see how the WA state park system would approve the measure. The Navy should practice their war games on their own turf and leave the peace and resplendent majesty of our parks be.⁵⁹

On behalf of Whidbey Environmental Action Network, we urge the Commission not to approve using state parks for military training. Frankly, we believed that this proposal had finally and deservedly been abandoned. The process has been dysfunctional, with basic information unavailable (hidden or not disclosed by the Navy) to the public and State Parks; required adequate environmental review evaded by both the Navy and State Parks; and the basic unavoidable inconsistencies between statutory and rule purposes and requirements similarly evaded or ignored.

Please see the attached previously submitted comments.

There has been little change to the proposal. As far as we can tell, the only apparent changes are:

- 1) State Parks appears to be backing off on its promise to conduct widespread public outreach and involvement.
- 2) The Navy has identified two specific sites it proposes to use for climbing training, while remaining vague about others.
- 3) The use of paintball guns has been dropped. However, the use of realistic appearing faux weapons remains.

These changes are relatively minor and addressed in our comments below. Additionally, we have attached our earlier comments for ease of reference.

State Parks must allow and seek extensive public notice and comment.

We had been told that there would be two in-person opportunities for public comment, including a day and night hearing in Port Townsend. Now we are told that there will only be opportunity for written comments. We understand the problems presented by the pandemic, however, State Parks can and should perform much more extensive public outreach about this highly controversial and precedential proposal. At a minimum, press releases fully describing the proposal (not the Navy's vague shifting description) should be sent to every newspaper in the state, as well as other prime news media (such as radio, TV, and streaming news stations). Please note that I am not referring to legally required notices such as those required for SEPA.

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State Parks should not allow the Navy to pass off the extreme liability its activities create to State Parks, local jurisdictions and Washington taxpayers.

Please see our earlier comments.

The Navy proposes that because there has been no known accident to date, none will occur in the future. Now if only we could convince the state of this view of the world when it comes to operating a motor vehicle. The Commission should understand that the "accident" in North Carolina occurred after years of the same military exercise being conducted with no one being killed - or sued. The use of realistic appearing faux weapons could easily result in this sort of mishap. I suggest you may want to ask the Navy representatives if they have ever personally had insurance and if so, why? Finally, State Parks outreach should specifically apprise local

jurisdictions that they may be liable for any claims resulting from local law enforcement a la the North Carolina shootings.

Environmental review of key issues has been either non-existent or inadequate.

Again, see our earlier comments.

We are still waiting for real environmental review of this proposal, not the generalized boilerplate non-specific checklist submitted by the Navy. In particular, we are concerned that this may serve as a precedent for approval of future proposals which likewise are contrary to the mission and purposes of State Parks, as well as requirements in rule and statute for State Parks. Finally, the recent materials we have received make clear that the Federally mandated Finding of No Significant Impact (FONSI) and Environmental Assessment (EA) which the Navy granted itself may not be relied on to fulfill state environmental review requirements under the State Environmental Policy Act (SEPA). At numerous places in these materials the Navy professes ignorance of the existence and location of sensitive species and locations, and asks Parks to give them this information. But if the Navy lacked this key information, how could they conclude that there would be no significant impacts? State Parks may not rely on the Navy's self-serving environmental review. It is plainly inadequate and does not rise to either NEPA or SEPA standards.

The proposal is inconsistent with state parks' purpose, statute, and rules.

We have previously discussed this basal problem at length; see our earlier comments.

State Parks personnel appear to be bent on torturing the statute and rules to provide a legal rationale for granting this permit despite its obvious and far reaching inconsistency. This ignores well established principles of statutory construction and application. The general rule is that when a statute specifies exceptions to its requirements, exceptions that are not so specified are necessarily prohibited. No conceivable reading of the statutory requirements for State Parks includes covert military training; exceptions that are set out in the statute specifically include various limitations. See, i.e., RCW 79.05A.080, 085 (leases for television stations and antennae) and §087 (advertising).

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Use of statutory provisions allowing concessions and leases "upon such rentals, fees, or percentage of income or profits" is not appropriate. RCW 70.05A.030(5). First, the statutory language appears to be intended to apply to certain commercial activities, not the sort of activity proposed by the Navy. The Navy cannot pay a portion of its expected income or profits. The plain language of the statute shows that it is not intended to apply to this sort of non-commercial activity at all. Second, even if the allowance for granting concessions and leases were applicable, there is a general sideboard for these: they may not "prevent the public from having free access to the scenic attractions of any park." RCW 79.05A.030(5)(d). But when the Navy proposes to prevent interaction with the public or use an established rock climbing site while excluding other climbers, that is precisely what is being proposed. State Parks may not grant the Navy an exclusive use anywhere that is a "scenic attraction."

Given the statutory language, we do not believe that a permit may be granted for the Navy's proposed incompatible uses based on the statutory language allowing the granting of concessions and leases. And any other mechanism in statute or rule for permitting the proposal must be subject to the inherent legal standard that it not be inconsistent with the statutory purpose and mission of state parks.

The CAMP for Deception Pass needs to be amended relating to climbing.

Regardless of the Navy's proposal, State Parks needs to amend the existing CAMP plan for Deception Pass State Park. Refrigerator Rock (at least) appears to be in existing current use by the climbing community. However, we are unaware of any active climbing routes on the

Whidbey Island side of the pass. State Parks needs to correct the existing plan to account for this use. Obviously, this will require outreach to the climbing community.

Regardless of the existing use of Refrigerator Rock, the Navy's proposal regarding climbing is not consistent with existing rules and plans for Deception Pass State Park. It proposes periodic exclusive use. It proposes technical climbing where not currently allowed per the CAMP. State Parks should reach out to the climbing community about the Navy's proposed exclusive use of Refrigerator Rock.

Attachments:

RE: Military training in state parks, March 6, 2020

RE: Military training in state parks, Jan. 22, 2020

1

Whidbey Environmental Action Network

Restoration Education Preservation

Box 53, Langley, WA USA 98260

(360) 579-4202 wean@whidbey.net

Dedicated to the preservation and restoration of the native biological diversity of Whidbey Island and the Pacific Northwest

March 6, 2020

TO: Washington State Parks and Recreation Commission

FROM: [REDACTED]

RE: Military training in state parks

Please acknowledge receipt of this memo by providing an email reply. A previous submission of ours dated Jan. 22, 2000 has not been acknowledged, so we are resubmitting it as an attachment to this memo.

On behalf of Whidbey Environmental Action Network, we urge the Commission not to approve using state parks for military training. The proposal exposes the state and local jurisdictions to large liability and is inconsistent with state parks' purpose, statute, and rules. Additionally, while this proposal has never undergone review pursuant to the State Environmental Policy Act (SEPA; ch. 43.21C RCW) we've been informed that this is now occurring. However, this memo is necessarily generalized regarding the proposal's environmental impacts due to the generalized boilerplate nature of the application and the lack of the SEPA checklist.

The Navy's proposal exposes the state and local jurisdictions to unacceptable liability for actions by and growing out of the Navy's activities.

If the Commission approves this expanded use of our parks, it should assure that Washington taxpayers are not on the hook for any disasters or damage caused by or the result of the Navy's activities. In North Carolina a deputy sheriff killed one and seriously wounded another military trainee. The deputy was not aware that he was part of a war game. The county was then sued and had to pay over \$750,000 in damages.

It is easy to image scenarios where similar tragedies occur. Military personnel will be carrying realistic "simulated" military weapons.¹

A camper or hiker notices a man hiding in the bushes, seemingly stalking park visiting children playing in the woods, or other campers and hikers. The

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"Rubber replica weapons could be carried by trainees . . ." Navy Application. Note that this uses the conditional "could" instead of "should" or "will." This boilerplate language is repeated ad nauseum in each of the submitted applications. In fact, the individual applications are virtually indistinguishable from each other and show no evidence of consideration of the particular characteristics of the 29

individual state parks in which the Navy seeks permission to conduct covert military training.
2 camper gets his gun², confronts the stalker, discovers he has a gun³, and shoots, believing that he is protecting the children (or himself or other park visitors). Or perhaps the children's mother calls 911 and the same scenario plays out with county law enforcement.⁴

The Navy's previous permit did not waive the federal government's sovereign immunity.⁵ Rather, it just established the venue where any claims against the Navy by the state must be brought (the federal DC Court of Claims). The cost of bringing suit would, of course, itself be very large, even assuming that the predictable sovereign immunity defense used by the Navy failed. It is difficult to imagine a way of assuring that State Parks and local counties are not left holding the bag other than to require a waiver of liability and bonding by the Navy. Protection provided for the state from claims resulting from recreational activities is not applicable in this situation, simply because the Navy activities proposed to be permitted by the state are not recreational in nature. For this reason, bonding should be required, and the North Carolina incident provides some guidance on the amount of such bonding necessary to cover any "accidents."

Both local jurisdictions and the state should insist on two actions by the Navy to protect Washington taxpayers. First, State Parks should require the Navy to enter into a "hold harmless" agreement placing all liability arising out of the Navy's activities squarely and solely on the Navy; this needs to include assumption of liability for third party claims brought against the State and its subdivisions. Second, bonding sufficient to cover at least one potential damage claim in each county and park where training is proposed should be required. This is necessary to protect Washington taxpayers. Finally, if the Commission does approve military training in state parks, the permit should provide that any incidents of disturbance or people reporting feeling threatened in any park will automatically result in cancellation of the permits for all parks. Environmental review must be performed for military training in state parks.

Please also see our earlier comments in the attached memo of Jan. 22, 2020 regarding SEPA compliance.

First, it is important to note that the exemption claimed for the earlier (about to expire) permit is completely without legal merit. The exemption claimed applies to "business and other regulatory
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Given the rates of gun possession and ownership in the US, it is a near statistical certainty that at any given time there will be state park visitors with access to guns (i.e., in their vehicles, if not on their person).

3

The Navy is explicit that the trainees will carry realistic appearing simulated weapons.

4 In such situations even if the confrontation ends peacefully, it clearly violates rules against creating a disturbance in state parks. Please see our attached comments originally submitted Jan. 22, 2020.

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We note that the original 2014 application included language to "release and indemnify State from and against any and all liability, loss and damage incurred by State arising directly on account of Grantee and Grantee's agents in the exercise of the rights granted herein . . ." However, this language was not present in the 2015 permit as issued.

3

licenses." ⁶ While there is a provision for "renewal or reissuance of a license regulating any present activity,"⁷ even if one takes the Navy's claim at face value that it was previously conducting unpermitted covert military training in State Parks, there was no pre-existing permit to renew or re-issue. This provision may not be used to avoid environmental review of an activity or its expansion which has not previously been reviewed. This exemption plainly does

not include covert military training generally or in this specific instance. Because the exemption was improperly issued, it is ultra vires and may not be relied on to justify continued exemption from environmental review.

Second, we request that we be provided any environmental analysis that has or is being used by state parks in fulfilling its obligations under SEPA. If there is a public comment period for any environmental review conducted by State Parks, we request that we be promptly informed of it.

We also request that if State Parks adopts any existing documents in fulfillment of its SEPA obligations, please promptly provide the adopted document(s) and notice of adoption (WAC 197-11-630(2); §965). If necessary please consider the forgoing a public records request.

Third, despite the rosy picture painted in the Navy's boiler-plate applications, there are numerous reasons why the proposal warrants preparation of a full environmental impact statement:

- Inconsistency with existing policies and laws that govern state parks;

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WAC 197-11-800(13)(a) reads in whole:

(13) Business and other regulatory licenses. The following business and other regulatory licenses are exempt:

(a) All licenses to undertake an occupation, trade or profession.

(b) All licenses required under electrical, fire, plumbing, heating, mechanical, and safety codes and regulations, but not including building permits.

(c) All licenses to operate or engage in amusement devices and rides and entertainment activities including, but not limited to, cabarets, carnivals, circuses and other traveling shows, dances, music machines, golf courses, and theaters, including approval of the use of public facilities for temporary civic celebrations, but not including licenses or permits required for permanent construction of any of the above.

(d) All licenses to operate or engage in charitable or retail sales and service activities including, but not limited to, peddlers, solicitors, second hand shops, pawnbrokers, vehicle and housing rental agencies, tobacco sellers, close out and special sales, fireworks, massage parlors, public garages and parking lots, and used automobile dealers.

(e) All licenses for private security services including, but not limited to, detective agencies, merchant and/or residential patrol agencies, burglar and/or fire alarm dealers, guard dogs, locksmiths, and bail bond services.

(f) All licenses for vehicles for-hire and other vehicle related activities including, but not limited to, taxicabs, ambulances, and tow trucks: Provided, That regulation of common carriers by the utilities and transportation commission shall not be considered exempt under this subsection.

(g) All licenses for food or drink services, sales, and distribution including, but not limited to, restaurants, liquor, and meat.

(h) All animal control licenses including, but not limited to, pets, kennels, and pet shops.

Establishment or construction of such a facility shall not be considered exempt by this subsection.

(i) The renewal or reissuance of a license regulating any present activity or structure so long as no material changes are involved.

7

WAC 197-11-800(13)(a)(h)(i).

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- Nearly 600% increase in the number of parks affected;
- Failure to disclose any site-specific characteristics (i.e. presence of environmentally sensitive areas and features) that are present in the particular parks, and steps to avoid damaging them. Simply stating that such areas will be avoided does not allow rational consideration of

whether the proposal will, in fact, do this;

- Inclusion of new activities (i.e. climbing training) that plainly have a potential for negative environmental impact;
- Failure to disclose how trainees hiding for extended time periods will deal with defecation needs;
- The deliberately ambiguous language and lack of discussion regarding spying (i.e. surveillance, observation) on park staff and visitors.

Fourth, State Parks may not rely on the FONSI the Navy issued itself. Per WAC 197-11-610(2) that NEPA document must "adequately address" the elements of the environment contained in SEPA.⁸ Those elements include "Habitat for and numbers or diversity of species of plants, fish, or other wildlife," "Unique species," and "recreation."⁹ The generalized non-site-specific boilerplate language used in the FONSI does not satisfy SEPA's requirements here.

The proposal is inconsistent with state parks' purpose, statute, and rules.

The primary proposal is for military trainees to sneak into the uplands of state parks and hide for extended lengths of time while surreptitiously surveilling unwitting park staff and visitors. Please also see our earlier comments in the attached memo of Jan. 22, 2020 regarding the inconsistency of this activity with the purpose, policy, statute, and rules for state parks.

The ethical problem of drafting unknowing park personnel and visitors into becoming unwitting participants in military training must be addressed. This goes to the very heart of the purpose of our state parks: recreation, and nature and historic conservation.

The Navy has lands that are virtually identical to that in the parks. Joseph Whidbey State Park is an example where a state park and Navy owned lands are immediately adjacent with no obvious difference between them. The only thing Joseph Whidbey has that the Navy property lacks is civilians available for surveillance. The Navy could simply hire people or use other military personnel on its own property for this purpose.

The only cures for this are either not allowing the activity or informing people so they know that they may be spied on when they are recreating. Attached at the end of this memo is a somewhat, but not entirely tongue-in-cheek suggestion for this. However, the Commission needs to realize that this is part of a larger problem and increasing trend in our society of invading people's privacy and monitoring every aspect of their economic and social existence. Purchase something

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WAC 197-11-610(2) A NEPA environmental assessment (EA) or documented categorical exclusion may be adopted to support a determination of nonsignificance instead of preparing an environmental checklist, if the requirements of WAC 197-11-340, 197-11-600, and 197-11-630 (and WAC 197-11-350 and 197-11-355 as applicable), are met and elements of the environment in WAC 197-11-444 are adequately addressed. (Emphasis added.)

⁹ WAC 197-11-444.

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with a credit card? Make a phone call? Its been recorded in the NSA facility in Bluffdale, Utah. Must every activity we engage in be monitored and observed by the government?

The Parks and Recreation Commission must either decline to grant the Navy's application or provide meaningful notice to the public that when they enter these state parks they will be participants in covert military training. Not doing so is failing to act in the public interest.

Climbing is not currently permitted at Deception Pass State Park and there are other places where high angle climbing can be taught and practiced.

Again, please also see our earlier comments in the attached memo of Jan. 22, 2020 regarding climbing at Deception Pass.

Climbing is not included in the Deception Pass State Park plan. In fact, Deception Pass is not currently used by climbers. The Navy is proposing to use it for climbing training. Translating the Navy's application into understandable English is difficult¹⁰, but it seems to say that it will use both ropes and other climbing gear that must then be retrieved (i.e. cams, etc.), resulting in multiple trips. It does not disclose where in the park it will occur; whether the same routes will be used regularly or whether new routes will be used every time; how often and how many people will be involved; and if this is basic or advanced climbing (i.e. complete rookies or people honing their skills). This lack of disclosure makes it difficult, if not impossible to predict the impact. However, it is predictable that this will impact the vegetation that occurs on any routes. It may also serve as an inspiration to others to begin conducting this currently unpermitted activity in Deception Pass State Park. Finally, there are other locations, both nearby and in the region that are currently available for climbing. For example, Mt. Erie is also on Fidalgo Island and is a popular climbing site. Of course, there are literally hundreds of places in the Cascades and Olympics where climbing, including training, is regularly conducted. There is absolutely no reason why State Parks should allow this in Deception Pass State Park.

Summary.

The Navy has applied to conduct covert military training in 29 state parks – most of the coastal state parks in Washington. For the reasons discussed above the State parks and Recreation Commission should deny the Navy's permit application.

¹⁰ The boilerplate language used in the application is:

- High-Angle Climbing
 - o High-Angle Climbing events are training evolutions where trainees negotiate cliffs, rock faces, and other vertical challenges to develop infiltration and retrieval of climbing equipment techniques. Trainees are instructed in the use of ropes and other climbing gear to traverse obstacles while carrying gear.

1

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Dedicated to the preservation and restoration of the native biological diversity of Whidbey Island and the Pacific Northwest

Jan. 22, 2020

TO: Washington State Parks and Recreation Commission

FROM: [REDACTED]

RE: Military training in state parks

On behalf of Whidbey Environmental Action Network, we urge the Commission not to approve using state parks for military training. Below, we discuss the dysfunctional nature of the current process and suggest ways to correct this problem, and then discuss how the proposal is inconsistent with statute and code under which the Commission operates.

The Commission should undertake the following steps in considering the Navy's attempt to conduct military training in 29 coastal state parks.

1. The Navy should have to submit an application with sufficient detail to allow rational public and agency review of the proposal.

Require submission by the Navy of application materials that fairly apprise the public of what is being proposed. Currently, there is not even an application from the Navy available for public review. We have had to base comments elsewhere in this memo on the 2015 application and the

Navy's confusing, obfuscatory, and self-serving federal NEPA FONSI. The public deserves to have a clearly described proposal on which to comment and the Commission likewise cannot rationally determine if the proposal is consistent with the applicable statute and rules. We believe it is not consistent, and lay out why elsewhere in this memo, but lack of a proper application defining and describing in detail the proposal has made review and analysis difficult. For members of the general public, it makes effective comment well nigh impossible.

2. Adopt a schedule that allows and seeks extensive public notice and comment.

After the Navy submits an actual application, adopt a schedule that recognizes the great public controversy generated by the use of the people's parks for war games by allowing adequate time, notice, and opportunity to comment on the proposal. All of the affected parks are in western Washington. We believe that there should be two meetings in western Washington with extensive public notice and invitation for public comment. The current schedule proposes to have the Commission consider the proposal at its meeting in Chelan in March, well away from the majority of the state's population which actually resides closest to the 29 parks which the Navy seeks to use. We suggest instead dedicating the major portion of the May meeting in Port Townsend to public comment followed by a special session of the Commission in Seattle dedicated exclusively to receiving public comment and consideration of this proposal.

It is appropriate to have such a far reaching proposal considered in the state's population center. We realize that this may cause difficulties with performing other Commission business;

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however, the Commission's consideration and decision on this matter is going to set a far reaching precedent for the use of state parks and the way in which such decisions are made. The current process almost seems intended to limit and minimize public input and participation. We are sure that this is not the Commission's intention, and stepping back to assure providing for full and fair public input will assure that there is no confusion over the Commission's desire to hear from and consider the public's wishes.

3. Perform environmental review of the proposal.

It is not clear to us if the earlier 2015 proposal (for 5 parks) underwent any state environmental review (i.e. pursuant to the State Environmental Policy Act). The current proposal is apparently being granted a categorical exemption based on the claim that it is merely an extension of an existing permit. There are several problems with this. First, as we explain elsewhere, the proposal is simply inconsistent with the primary statute and code under which the Commission operates. This in itself is something that should have been considered in an environmental review. 1 Second, the precedential nature of allowing surreptitious military training in state parks should have been and now must be considered.

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Third, the proposal increases the number of state parks used for military training from 5 to 29, a nearly 6-fold increase. Finally, a new activity (climbing) is proposed. Taken either individually or all together, these factors cause the proposal to require SEPA review and, we believe, a determination of significance and performance of an environmental impact statement.

The proposal is inconsistent with the statute and rules that govern the Commission and state parks.

1. Because there has been no application to review, these comments are necessarily based on:

- Proposed NSW Training Within the Pacific North West, Ms. Margherita Parrent, 2014
- BLAKE ISLAND, FORT FLAGLER, ILLAHEE, MYSTERY BAY, & SCENIC BEACH STATE PARKS – BLAKE ISLAND, FORT FLAGLER, ILLAHEE, MYSTERY BAY, & SCENIC BEACH STATE PARKS RIGHT OF ENTRY PERMIT #P999999 NAV1, May 1,

2015

• FINDING OF NO SIGNIFICANT IMPACT FOR NAVAL SPECIAL OPERATIONS

TRAINING IN WESTERN WASHINGTON STATE, S. T. GOODFELLOW Director, Energy and Environmental Readiness Division, 12/18/2019

2. The proposal is not consistent with the legislative policies and principles for state parks.

The statute governing management of the state parks is chp. 79A.05 RCW. §305 is the legislative Declaration of policy—Lands for public park purposes. The legislature was explicit that these lands are for "public park purposes" and that "To comply with public park purposes, these lands shall be acquired and managed to . . . Maintain and enhance ecological, aesthetic, and

1

SEPA rules require consideration of whether a proposal will serve as a precedent for future actions. WAC 197-11-060(4)(d); §330(3)(e)(iv).

2

The significance of impacts is also gauged by whether an action will "Conflict with local, state, or federal laws or requirements for the protection of the environment." WAC 197-11-330(3)(e)(iii). We discuss elsewhere the conflicts with state law and code that this proposal presents.

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recreational purposes."3 These purposes are echoed in the "Declaration of principles" for seashore conservation areas:4

The beaches bounding the Pacific Ocean from the Straits of Juan de Fuca to Cape Disappointment at the mouth of the Columbia River constitute some of the last unspoiled seashore remaining in the United States. They provide the public with almost unlimited opportunities for recreational activities, like swimming, surfing and hiking; for outdoor sports, like hunting, fishing, clamming, and boating; for the observation of nature as it existed for hundreds of years before the arrival of Europeans; and for relaxation away from the pressures and tensions of modern life. In past years, these recreational activities have been enjoyed by countless Washington citizens, as well as by tourists from other states and countries. The number of people wishing to participate in such recreational activities grows annually. This increasing public pressure makes it necessary that the state dedicate the use of the ocean beaches to public recreation and to provide certain recreational and sanitary facilities. Nonrecreational use of the beach must be strictly limited. Even recreational uses must be regulated in order that Washington's unrivaled seashore may be saved for our children in much the same form as we know it today.5

No conceivable reading of these statutory purposes and principles could include surreptitious military training with weapons that appear realistic and intimidating behavior including spying on park visitors. Such activities are simply not consistent with and conflict with the statute.

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They are also inconsistent with the stated purposes in the Commission's mission statement.

3

The six statutory "park purposes" for which these lands "shall be acquired and managed" are:

- (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.

RCW 79.05.305.

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State parks on the outer coast (the westside of the Olympic Peninsula) include such areas, which appear

to be within the areas proposed for use by the Navy.

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RCW 79.05A.600.

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The statute does explicitly allow some uses of state parks land that are not consistent with these purposes and principles, For example, the Commission may let leases for antennas, but these are subject

to environmental review. RCW 79A.05.085. Advertising in parks may be allowed, but is subject to an extensive list of conditions, including that it "not detract from the integrity of the park's natural,

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3. The proposed activities are not consistent with and are prohibited by the rules for state parks.

Land classification system. The land classification scheme for state parks is set forth in rule.7

This rule again makes clear that the purpose of state parks is recreation, and environmental and cultural conservation and preservation.8

None of the classifications even suggest that the

included lands are designated for or suitable for surreptitious military training. Indeed, the statutory classification requirements provide that

Nothing in this section shall be construed to allow uses that are otherwise prohibited, nor prohibit uses that are otherwise expressly allowed, by the

commission, this code or by statute.9

Below, we discuss how the proposed uses are prohibited by the rules. However, it is important to

realize that while the Commission can "expressly" allow some uses, these may not be

inconsistent with the underlying statute. As discussed previously, the proposed activities are

inconsistent with the statutory purposes and principles for state parks.

The proposed uses are also prohibited by the adopted rules regarding firearms, "other weapons," intimidation, disturbance, and climbing.

Firearms. According to the Navy FONSI, training participants will carry weapons that look like

actual standard military firearms, but have been modified to fire paint pellets. The rules for firearms in state parks, to "discharge or propel [firearms] across, in, or into any upland state park area" is prohibited unless the Commission has authorized a "special recreational activity;"

violation of this requirement is a gross misdemeanor. 10 But a "special recreational activity"

requires a "special recreational event permit . . ." These permits and the activities they allow ". . .

must be oriented towards a recreational pursuit. Not more than three permits will be issued to a

given applicant for a similar event at the same park during a one-year period."11 The proposed

military training fails all of these requirements. It is neither recreational in nature and more than

three events per year at individual parks are proposed.

cultural, historic, and recreational resources . . ." RCW 79A.05.087. There is no explicit allowance of military training. Thus, the exceptions to the statute's stated purposes and principles are explicitly stated, including limitations.

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WAC 352-16-020, 030.

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State park areas are of statewide natural, cultural and/or recreational significance and/or outstanding scenic beauty. They provide varied facilities serving low-intensity, medium-intensity, and highintensity outdoor recreation activities, areas reserved for preservation, scientific research, education, public assembly, and/or environmental interpretation, and support facilities. WAC 352-16-020.

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RCW 79A.005.030(2).

10 WAC 352-32-120(1).

11 WAC 352-32-047.

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Other weapons. While it is arguable whether the weapons used in the proposed military training fall are "firearms" as that term is used in rule, even if the weapons are not considered firearms, they are still prohibited unless a "special recreational activity" is authorized by the Commission.¹² Again, the proposed use simply does not qualify for the required permit. Intimidation and disturbance. It is difficult to imagine that a visitor or employee finding themselves surreptitiously spied upon by someone trying to hide while carrying a firearm would not feel intimidated.¹³ Such conduct is explicitly prohibited, a legal infraction, and constitutes a "disturbance:"

. . . conduct . . . which otherwise impedes or disturbs state park employees or volunteers in the performance of their duties, or which impedes or disturbs the general public in the use and enjoyment of state park areas, is prohibited."¹⁴

The proposed use clearly runs afoul of this prohibition. The Commission may not allow a use explicitly prohibited by rule.

Climbing. The Navy's proposal includes climbing at Deception Pass, a state park where climbing is an unusual activity and not included in the adopted management plan.¹⁵ Climbing in "state park areas without climbing management plans . . ." is limited to ". . . the use of routes with established fixed protection, new routes that do not use fixed protection . . ." There are no established routes with fixed protection at Deception Pass. Any new routes used for military training must be either free climbed or climbed with non-fixed (belayed and not anchored) rope. The Navy proposal is too ill defined to determine if that is what is proposed. We also have concerns over the environmental impacts of climbing the cliffs at Deception Pass. While steep, they are vegetated. Repeated climbing by multiple parties on a regular basis will inevitably degrade the vegetation. This is truly a new activity where the proposed scale and frequency warrants full planning and environmental review. The scope of the proposed activity is such that it should not be allowed absent revision of the park management plan.

12 WAC 352-32-121 prohibits "display, discharge or propel across, in, or into any upland state park area

. . . air or gas weapon, or any device capable of injuring or killing any person or animal, or damaging or destroying any public or private property . . ."

Insofar as the Navy may claim that paint pellet firing air rifles are not "capable of injuring or killing any person or animal" we suggest that the Commission determine if the participants in these war games will be wearing protective equipment, e.g., eye protection. If so, that demonstrates that these

weapons are capable of causing injury and are subject to the standards for "other weapons."
13 "Intimidate" means to engage in conduct that would make a reasonable person fearful. WAC 352-32-010.

14 WAC 352-32-057.

15 Over the last 30+ years I have never seen any climbing activity in Deception Pass State Park. The primary climbing location on Whidbey and Fidalgo Islands is Mt. Erie, within the Anacortes Forest Lands. I have seen military personnel climbing there on multiple occasions, but it was not obvious if this was formal military training or personal recreation. In any event, Mt. Erie is municipal, not state, parkland, and the climbers were participating in an activity also engaged in and on the same terms and at the same location as by the general public.

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Summary.

If the Commission believes that the need for military training in state parks is so great that it should be allowed despite current inconsistency with and prohibition by the governing statute and rules, the statute must be amended by the legislature, signed into law by the governor, and the WAC and relevant park management plans amended with full environmental review and public process.

WEAN and a significant portion of the general public believe that there is no pressing need, given the many miles of shoreline already under military control, to invade our state parks. The Commission should either reject the Navy's proposal outright or undertake a much more expansive and open public process.

Whidbey Environmental Action Network has serious concerns about the Navy's proposed use of 29 of our shoreline associated state parks for what it describes as necessary but non-invasive training. After a perusal of all available documents, we continue to have a great many questions. We hope that you will pose these questions to the Navy's presenters at your upcoming meeting, and to staff, as appropriate. Please also review our submission for the March meeting. We will provide a revised and updated copy of that submission. The questions below are not in any specific order. Rather, they represent a collection of issues, as they came to mind.

~ First and foremost, how do the Navy's proposed activities meet the standards in the State Parks mission, vision, and strategic plan? This is not merely a rhetorical question. We need to see specifics.

~ The Navy has had use of at least 5 of our parks for a 5 year contract period. In response to a number of public records requests it is now known that the Navy never once "coordinate(d) with Parks management and law enforcement in advance." In fact, it appears that the Navy used 7 rather than the permitted 5 parks. What reason do we have to believe that it will "coordinate" in the future?

~ Given this lack of transparency, what mechanism will be in place to assure that coordination, and what consequences in the event of failure to coordinate?

~ Given the Navy's lack of transparency, there will be a great need for oversight and likely enforcement. What provisions has State Parks made, or will it make, for such oversight and enforcement?

~ What will be the cost of this oversight and enforcement, and what will be the funding source?

~ Given the Navy's claim that all is well and there will be no need for either oversight or enforcement, will the Navy post a bond for the cost to State Parks of such oversight and enforcement?

~ The Navy claims that the public will not encounter its trainees because trainings will be late at night or underwater, and there will be safety observers. This begs several questions. Many of the listed parks are designated for day use only. This implies special privileges for this particular user over the civilian public.

Navy RPA Comments- through 12/18/2020

Why should the Navy be granted such special status, and how is the granting of such special status determined? How might other entities apply for and gain such special status?

~ What provisions are there in the proposed agreement(s) for permit amendments after approval, should those prove necessary?

~ While the Navy claims that the statement “The Navy assumes no liability” is a myth, its response merely states that there have been no claims in the past, so there will be no need to accept liability in the future. This is simply unacceptable. Please require a responsive answer from the Navy.

~ Who is left with the liability in the event of accident and subsequent lawsuit?

~ Has State Parks consulted with the Attorney General on these questions?

~ How are potentially liable parties to be notified of their potential risk?

~ Have such potentially liable parties agreed to accept such liability?

~ Does the State Parks Commission have the legal authority to sign a contract/permit which opens other parties to liability?

~ While the Navy asserts that it consulted with the tribes, it appears that consultation was specifically a §106 consultation, so very limited in scope. The question put to the tribes was not one of go/no go, but rather: it's a go, what specific concerns do you have about historical artifacts? Please require the Navy to make genuine efforts to solicit public comment on this proposal.

~ The Navy makes many assertions concerning environmental protections, but is seriously lacking in specifics. In response to a question about protection of Priority Habitats and Species, we are told trainees will remain on trail. But there are locations they intend to use where there is no trail, or only the blown out remnants of a trail. Please ask the Navy to be very specific concerning each and every site it intends to use, not just mapping an entire park but providing us with the very specific location(s) within each park and how, in each of those specific locations, they will avoid harm.

~ The Navy claims to have received concurrence from Dept of Ecology to make use of tidelands. That concurrence is dated 9-28-18. The proposal is considerably broader than what it was then. Please ask the Navy whether they have consulted with Ecology to update that concurrence.

~ In response to State Parks concerns for Taylor's checkerspot butterfly and Golden Indian paintbrush, the Navy asserts that its trainings will not occur in occupied habitat. That is not a sufficient response, given the Navy's painfully evident lack of information about the environmental sensitivities of our state parks. Please require the Navy to review and update its inadequate EA, and to map out specific areas where trainings will occur, so that parks staff can evaluate the potential harms.

~ Time and again the Navy's response to Parks' environmental concerns is one of ignorance, saying “please map sensitive areas, so we can avoid them.” That is not reassuring. In fact, such statements demonstrate the inadequacy of that EA. Please insist that the Navy review and rewrite the EA so that it complies with both SEPA and NEPA.

~ Please also expand your list of parks with designated conservation areas to include all such parks. Missing

from your list are South Whidbey and Deception Pass. Please have staff review that list for completeness to assure that the Navy amends its EA in relation to all relevant parks.

~ In response to site-specific concerns brought up by State Parks, the Navy's most consistent response is: please show us locations of concern. This is simply not acceptable. Again, the Navy needs to do a real, genuine, thorough, and accurate EA, which should then address all those areas of concern. And again, the Navy needs to show on maps the very specific sites it proposes to use. Without this information both staff and the public have no realistic basis on which to evaluate the proposal.

~ Once the Navy provides this information, Parks staff will be in a position to do a much more realistic SEPA review of the actual proposal, rather than the vague non-site-specific language of the existing documents. Please ask staff to prepare a new SEPA document – financed by the Navy – based on the new information.

Navy RPA Comments- through 12/18/2020

~ The Commission asked about rock climbing at Deception Pass. The Navy has been very secretive about specific locations there, and in response said they intend to use Refrigerator Rock along Rosario Road and a second site “next to North Beach by the bridge Scenic Vista parking area.” Certainly Refrigerator Rock is a known and evidently designated climbing area, so should be open to the Navy’s use as well – except that the Navy specifies that it will have trainers and other personnel on site to prevent the use by any others. That would make this an exclusive use. Given that the rock climbing public does not make reservations to use Refrigerator Rock, this could become rather a disappointment to people who have traveled some distance, only to discover that it has been taken over and is not available to them. Please ask the Navy how they intend to “coordinate with State Parks and law enforcement” to prevent conflicts at this site.

~ How has State Parks reached out to the climbing community to inform them that this popular climbing site will be unavailable to them at – presently unknown and unspecified times?

~ There appears to be a conflict between the use of Refrigerator Rock and WAC 325-32-085(6). How does the Commission intend to rectify this evident oversight? This use is, so far as we know, not shown in the CAMP plan, nor is there any evidence of a rock climbing advisory committee. How and when does the Commission propose to rectify this second oversight?

~ Since the purpose is to be clandestine, and Refrigerator Rock is directly adjacent to Rosario Road, how does the Navy reconcile the contradiction?

~ The second site, “next to North Beach by the bridge Scenic Vista parking area,” presents a far greater challenge and conundrum. That Scenic Vista parking area is directly on Hwy 20 and is, to understate the matter, immensely popular. Even late at night there are cars and trucks in that parking lot. Contrary to the Navy’s claim, portions of those rocks are heavily vegetated. Climbing those rock faces will 1) be completely visible to park visitors and the traveling public and 2) inevitably involve impacts to that vegetation, described in WAC 352-32-085(2)(d) as “gardening/cleaning.” In order to place the “Camelots and stoppers” one needs

an area cleared of any vegetation or soil which might prevent their firm attachment, also known as “gardening/cleaning.” Please ask the Navy for very specific descriptions of the proposed activities, and how this is consistent with the claim that trainees will not be visible to the public. Referring once again to the painfully inadequate EA, please ask that the Navy include in its revised and updated version a detailed description of how trainees will avoid the vegetation on the Scenic Vista climb route.

~ Given that this activity appears to be inconsistent with the Deception Pass CAMP plan and with WAC, please ask staff to explain how this activity will be brought into compliance.

~ The Navy was asked how it would protect the feeder bluffs at Fort Ebey State Park, and responded that trainees would use the trail up the bluff, near Lake Pondilla. Those bluffs are Coastal Bluff Prairie, quite rare. They contain rare plant communities and are very sensitive. While on the one hand we are pleased that trainees will/would use the trail, this would make them very visible to anyone looking out from the picnic area above. We keep getting mixed messages from the Navy. Either these exercises are clandestine, or they’re in the wide open, visible to everyone. Or does the Navy intend to exclude the public during these exercises? Please ask for some clarity on this issue.

~ We are experiencing a great deal of frustration in reviewing the Navy’s SEPA checklist. While it is very wordy, it fails to provide the necessary information. As mentioned above, please ask the Navy to rewrite its SEPA checklist to include actual responses to the questions rather than PR statements. We really do not need a rundown of all the various training modules which are then stated not to be planned for any state parks. We also do not need bald assertions without factual support.

~ In response to the question of where activities will be located, we are given a list of parks. Boy, that narrows it right down. Again, please ask for specific locations within each park.

~ in response to the question of site topography, we are given short and general statements about each park, but not about the specific areas within those parks which will be impacted.

~ Next question: steepest slopes. Again, generalizations for entire parks rather than areas of impact. Not responsive.

~ unstable soils? Yes, most of these parks have unstable steep areas. Again, nothing specific to the sites of intended impact.

~ what kind and amount of vegetation will be removed or altered? The claim is that there will be no impact. This is inconsistent with the actual proposal and must be revisited.

~ threatened and endangered species? The discussion about possible sites of *Castilleja levisecta* (Golden paintbrush) is hopeless, but at least they are aware of its presence or potential presence. We have seen nothing to indicate that they will avoid those sites.

~ may we suggest that the embarrassing error of calling *White meconella* (*Meconella oregana*) "oregano," be corrected. Also, its not *Symphyotrichium* but *Symphyotrichium*. Such errors do little to inspire confidence in the information intended to be conveyed.

~ the cavalier statement that "ground cover is most likely to be impacted by passing foot traffic, although it would quickly recover and would not impact the survival or function of the habitat" has no basis in fact. This is followed by "the level of foot traffic associated with each group would not wear paths in the training study area." It is yet another bald assertion – one that is contradicted by work in restoration ecology. This is not acceptable and genuine evaluation of the actual impact, including number of persons/passes on specific locations/habitats needs to be done.

There are many more questions, some of them raised by my colleague, [REDACTED], in his submittal. Because we are expecting a windstorm which will inevitably knock out electric power yet again, I will end here and get these questions before you in time for the 11-19-20 meeting.⁶⁰

Thousands of Washingtonians are on record opposing this application. Many are incredulous that regularly scheduled military training of any sort is being considered while unsuspecting civilians are using the very same parks.

See: <https://www.change.org/p/no-wargaming-in-washington-state-parks>

The Washington State Parks and Recreation staff is in the position of trying to thread the needle in order to satisfy the Navy and the public. The application is not in any way aligned with Parks Mission, Vision, or Strategic Plan. Yet considerable staff time is being consumed to try to satisfy everyone. The commission needs to give clear guidance to the Parks Staff and remove this sort of activity from consideration as other agencies in Washington state already have.

The citizens of Washington are trusting the stewardship of these valuable public assets to your care. The commission must hold the Navy accountable for unkept commitments and seek facts in a public forum. Please use these questions to query both the Navy and Parks Staff on past performance and future plans.

Questions for the Navy

Compliance with expired RoE Agreement covering 2015-2020

- How did the Navy obtain permission to train in Manchester State park which was not listed in the original 2015 RoE Agreement?

Note: Categorical exclusion documents record the Navy conducting Insertion/extraction, Special Reconnaissance and Over the Beach exercises in Manchester State Park three times in 2016 and 2017. Records for 2018 and 2019 were not provided.

- Can the Navy document notification of local law enforcement prior to any Special Ops training since local law enforcement has no such records? Include notification records for Island, Jefferson, Pierce and Kitsap counties.

Note: Open Records requests to Jefferson county Sheriff and Jefferson County 9-1-1 Communications dispatchers have produced no records of any notification of Special Operations Training from 2015 to 2020. Conversations with staff confirmed that no notifications have been received.

Navy RPA Comments- through 12/18/2020

- What pre-training site surveys were conducted 2015-2020 to ensure no environmental or historical conditions had changed since the prior year's training?

Note: There is no written communication with Parks staff on pre-training site surveys between 2015 and 2020 according to Open Records Requests

- Has the general public been observed as part of the 2015-2020 trainings? Has this been an objective of the training exercises?

Note: a SEAL trainer at a public event said, "Realistic training requires people who don't know they are being observed."

- What were the closest potential public-military encounters during the 2015-2020 trainings?
- Which command is responsible for compliance with RoE? Naval Facilities Northwest? US Special Operations Command? Naval Special Warfare Command? In other words, who takes responsibility for infractions?

Current Application

- Each of the 29 applications states: "Without the State Parks lands the entirety of necessary training is unable to be accomplished." This implies the SEALs cannot be adequately trained without each of the 29 state parks being requested.

Does this mean that SEALs are not now adequately trained? Please explain.

- Why are all 29 parks needed at any time during the year?
- "Best practices" requires that local law enforcement be contacted prior to training. Since this has not happened under the expired RoE, who takes responsibility for compliance?

- The Navy asserts that 30 years of using state parks without incident means that future training will also be incident free. How does tripling the number of trainings and expanding the sites by six fold not increase the risk?

- Does the Special Surveillance training involve observing the general public in State Parks? If not, then why are remote sites where the public is not present unacceptable?
- Does the Navy assume that the "replica weapons" carried during training will not be mistaken for actual weapons by the public?

Note: Replica weapons are the same size, shape and weight of actual weapons to provide a realistic training experience according to Navy documents.

Questions for Parks Staff

General questions

- How does this activity align with the mission, vision, and strategic plan of Washington State Parks and Recreation?
- Since the Navy claims to have been training in state parks for the past 30 years, what permits or permission were granted prior to the 2015 RoE Agreement?
- How can the public be reassured that they are not being used as unwitting targets for covert observation?

o How should the public be notified that training is underway?

- Explain how the benefits to the Parks and the general public outweigh the risks?
- Why is a five-year RoE Agreement the best approach to permit this activity? Why not evaluate each training activity individually since each site will have specific cautions and restrictions?
- Given the Navy's violations of the previous RoE Agreement, how will compliance be monitored?
- How will this decision impact public perception of Washington State Parks?
- If conditions change creating higher risk of environmental damage, how is the Navy

notified of new restrictions? And how is compliance monitored?

Costs incurred by WSPR

- How much staff time is being consumed to process the application and provide a report to the commission?
- What other projects are not being worked on while Parks Staff is spending time on the Navy Application?
- Depending on the guidance of the commission, how are costs associated with monitoring and reporting on activities of applicant to ensure compliance to be tracked and compensated?
- What are the ongoing costs of signage or other notifications that may be required to ensure the safety and confidence of the public?

Risks

- How has staff quantified the following risks?
 - o Lost revenue if visitors discover military training and elect not to patronize state parks
 - o Litigation costs and staff time in the event of property or personal loss or damage resulting from this activity
 - o Loss of public confidence in the event of an encounter leading to damage to property or person as a result of this activity
 - o Potential damage to parks property including sensitive plants and ecosystems since the training, of necessity, occurs “off path.”

The WSPR commission can save many staff hours that otherwise could be spent working on projects that align with the Mission, Vision and Strategic Plan of the State Parks by advising staff to discontinue processing the application and deny the Navy’s request. Public sentiment is a necessary consideration in all WSPR long term actions. Public sentiment does NOT support regular military training in state parks.⁶¹

On behalf of Citizens of Ebey’s Reserve (COER), we urge the State Park’s Commission to REJECT the use of our state parks for military training. COER joins with the Whidbey Environmental Action Network (WEAN) in opposing this proposed use and adopts WEAN’s well-reasoned analysis, the most significant and salient points of which follow.

A Short History Of Navy “Agreements”:

Making deals with the Navy is a fraught exercise. Agreements are only truly enforceable if adopted by Congressional Act. Litigation against the Navy seldom succeeds as courts are reticent to interfere with military decisions. Every act taken in contravention of previous agreements is cached as being necessary for National Security, whether related or not. That’s why the issuance of permits for the expansion of Navy activities in our state with little to no effective oversight is so critical. Once granted, it is almost impossible to regulate or retract activities, no matter how negatively they impact citizens, the environment, or our state. Unfortunately, the Navy has a long record of violating and walking away from agreements it has made in the Puget Sound region. This request is another in a long line of Navy actions encroaching into the civilian realm, one which needs to be stopped now.

See: Washington State sues Navy over expansion of Growler jet training on Whidbey Island Washington State’s Attorney General Bob Ferguson alleges the Navy did not do enough to examine the flights’ impacts on people and wildlife. The lawsuit in U.S. District Court in Seattle marks a rare court challenge of a Pentagon decision from state political leaders. (Hal Bernton reports, Seattle Times)

See also: ‘An egregious violation’: WA sues Navy for dumping toxic paint into Puget Sound The copper-based paint repels barnacles — but it could add up to a larger environmental cost. (John Stang reports, Cascadia Magazine)

The Navy's proposal is inconsistent with state parks' purpose, statute, and rules. The Navy and the Department of Defense seem determined to make Northwest Puget Sound and the Salish Sea a military training area for the Navy that will take precedence over state and civilian activities.

The Navy has been using 5 state parks in Washington State. This proposed increase, a nearly 600% increase in the number of parks affected, would further militarize our state, taking over some of the last vestiges (29 of our parks) for military training. Additionally, the Navy's individual applications are virtually indistinguishable from each other and reveal no consideration of the particular characteristics of the 29 individual state parks in which the Navy seeks permission to conduct covert military training. The Navy/DOD has lands that are virtually identical to those in the parks. Joseph Whidbey State Park, for example, is a state park adjacent to identical Navy-owned lands. Invading people's privacy and monitoring them without their awareness is not in the best interest of families and park users. The Navy has admitted that the presence of civilians adds realism to training exercises in which trainees sneak into the uplands of state parks and hide for extended lengths of time while surveilling unwitting park staff and visitors. Civilians are not props for military training; using civilians in this manner would be a violation of our constitutional and civil rights.

Environmental Review:

While this proposal has never undergone review pursuant to the State Environmental Policy Act (SEPA; ch.43.21C RCW) WEAN has been informed that a SEPA review is evidently now occurring. We join WEAN in recommending that this information must be made public as soon as possible and that no decisions for approval should be made until this process is completed.

The Navy is adept at issuing conclusions of non-significant impacts and providing themselves with waivers and permissions to expand activities without the judicious regard to the ultimate and cumulative impacts required by law.

☐ Per WAC 197-11-610(2) that NEPA document must "adequately address" the elements of the environment contained in SEPA. Those elements include "Habitat for and numbers or diversity of species of plants, fish, or other wildlife," "Unique species," and "recreation." The generalized non-site-specific boilerplate language used in the FONSI does not satisfy SEPA's requirements here.

While there is a provision for renewal or reissuance of a license regulating any present activity in our state parks, there is no pre-existing permit to renew or re-issue in this case. This provision may not be used to avoid environmental review of an activity or its expansion not previously reviewed. The above exemption does not include covert military training generally or in this specific instance. Hence, the exemption was improperly issued, and it may not be relied upon to justify a continued exemption from environmental review. The Navy must provide any environmental analysis that has or is being used by state parks in fulfilling its obligations under SEPA and provide that information to the public, parties of interest, and elected representatives.

If there is a public comment period for any environmental review conducted by State Parks, we request that we, the public, parties of interest, and elected representatives be promptly informed of such and given a reasonable opportunity to comment.

If State Parks adopts any existing documents in fulfillment of its SEPA obligations, we request they promptly provide the adopted document(s) and notice of adoption (WAC 197-11-630(2); §965) to WEAN on Whidbey Island at wean@whidbey.net and to COER at bbwilbur@frontier.com.

Valid and thorough environmental review must be performed for military training in state parks.

Increasing Need for the Outdoors:

The world has changed dramatically since the Navy first proposed this expansion of training within Washington's state parks. Our state parks and public lands have become more important than ever during this trying Covid-19 epidemic. Park visitation numbers have increased dramatically since March 2020 and school programs are using park lands for outdoor student education. Outdoor spaces for

recreation and family activities need expansion, not diminution, and their protection should be a priority for our state park commissioners. Additionally, the economic values of the outdoor recreation sector ranks higher than the economic values of the military.

Liability Issues

The Navy's proposal exposes the state and local jurisdictions to unacceptable liability for actions growing out of the Navy's expansion of activities, many of them currently being challenged in federal court. Approving this proposal would be inconsistent with state parks' purpose, statute, and rules. It's easy to image scenarios where tragedies and harm could occur. Navy (and other military) personnel will be carrying realistic looking "simulated" military weapons in state parks where weapons are not allowed.

The Navy's previous permit did not waive the federal government's sovereign immunity. Rather, it just established the venue where any claims against the Navy by the state must be brought (the Federal Court of Claims in Washington DC). The cost of bringing such a suit would itself, of course, be very large, even assuming that the predictable sovereign immunity defense used by the Navy was overcome. It is difficult to imagine a way of assuring that State Parks, local counties, and the people of the state are not left 'holding the bag' other than to require a congressionally adopted waiver of liability and adequate monetary bonding by the Navy.

Should the Commission approve this expanded use of our parks, it must first assure that Washington taxpayers are not liable for any damages caused by or the result of the Navy's activities. In North Carolina, for example, a deputy sheriff killed one and seriously wounded another military trainee. The deputy was not aware that he was part of a war-game training exercise. The county was then sued and had to pay over \$750,000 in damages.

Protection provided for the state from claims resulting from recreational activities is not applicable in this situation because the Navy activities proposed are not recreational in nature. Posting of bonds should be required.

Local jurisdictions and the state should insist on two actions by the Navy to protect Washington taxpayers:

1. State Parks should require that the Navy enter into a "hold harmless" agreement, approved by Congress, placing all liability arising out of the Navy's activities squarely and solely upon the Navy. This needs to include a waiver of sovereign immunity and an assumption of liability for third-party claims brought against the State and its subdivisions; and
2. Bonding sufficient to cover at least one potential damage claim in each county and park where training is proposed should be required. This is necessary to protect Washington taxpayers. (The original 2014 application included language to "release and indemnify State from and against any and all liability, loss and damage incurred by State arising directly on account of Grantee and Grantee's agents in the exercise of the rights granted herein. . . ." (This language was not present in the 2015 permit as issued.)

Conclusion:

To protect the State of Washington and its citizens in the event that the State Parks Commission permits military training in our state parks, the permit must provide that validated incidents of disturbance or people feeling threatened from these activities may result in the cancellation, at the discretion of the State Parks Commission, of the permits for these parks.

To quote from the assistant director of State Parks, the mission of the state parks is "to care for state resources and provide recreational access to the public." The Navy's proposal does not meet that standard or the current priorities of the people of Washington State and needs to be rejected.

Thank you for your attention to this very important matter. If you have any questions regarding the contents of this letter, please do contact me.⁶²

As a member of your Paddlesports Advisory Committee and an avid park user, I have seen so many

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more people outdoors since this spring in our parks and along and in the waterfront of parks. These parks, our state's crown jewels, have become even more integral to so many of us as we deal with pandemic restrictions and stress.

Over the past decade, too, the four-county heart of the Puget Sound basin has grown by 15.5%. Growth pressure and real estate prices have eliminated many formerly available places with outdoor access, particularly waterfront access.

Thus, it is even more important to steward our parks in ways that give our residents and visitors a safe and peaceful place to recreate, find comfort and respite in nature and to share time with family and friends amid COVID restrictions and pressures.

As commissioners the heavy responsibility for this rests with you, with staff to carry out your policies.

The current "proposal" from the United States Navy, wanting permission to use 29 of our water access state parks is a taking from the tax- and fee-paying people of our state by the federal government and must be denied by each of you.

WHY:

From a purely ethical perspective this "proposal" has never been subject to a public process since the SEALs started their incursions into state space with only the unreviewed permission of parks employees. It abrogates the rights of the public to have a say in the uses of their parks.

Further, the only reason that the US Navy wants to use our public parks is to surveil unaware park users in pursuit of their stalking skill development.

According to an article in the Whidbey News-Times and South Whidbey Record:

"In fact, members of the public may unwittingly be a part of the training. . . . according to the Navy. That means conducting operations around the public without the public being aware.

. . . Murray [Sheila Murray, Navy Region Northwest Deputy Public Affairs Officer] said.

1 <https://www.theurbanist.org/2020/07/09/seattle-tops-761100-residents-four-county-region-grows-to4264200/#:~:text=Between%202019%20and%202020%2C%20Seattle,40%25%20of%20the%20count,ywide%20growth.>

2 <https://www.psrc.org/sites/default/files/trend-population-202010.pdf>

" 'The whole point of doing it in populated areas is not to be seen,' she said."

3

"In any rare instances in which the activity is not compatible with the public, an instructor dressed in 'khaki pants and a white T-shirt' will instruct people to stay back, Murray said."

Frankly, unethical is the most polite word I can find for using uninformed civilians as surveillance guinea pigs without their permission.

From an equity perspective, these activities, past and proposed, give the federal US Navy SEALs preferential access to our parks over the tax- and fee-paying public.

In a classic example of the camel's nose under the tent prior to 2014 to pushing campers out of their sleeping bags next year if this "proposal" is allowed, it will have been accomplished without any public process, a clear taking.

WHERE:

From a practical point of view, despite the Navy's position that their 46 miles of Puget Sound shoreline access is so lacking that they have to take over our state parks, it is a fact a number of our parks they've targeted for wargames share property boundaries with federal and military properties. The need is specious.

The Navy, in addition to its 46 miles of federal property in Puget Sound has access to more than sufficient training sites on the Washington coast, in the Pacific Northwest and unlimited federal sites in Alaska.

From a regulatory point of view the Navy's plans violate the individual CAMP plans for each

targeted park.

I was fully involved and committed to the process for the CAMP plan for South Whidbey State Park a few years ago.

Also, I was one of the core group that negotiated in 1991 that when the Classic U section of the park was transferred from the Department of Natural Resources into Washington State Parks, that it be transferred in a protected status due to the environmental sensitivity of the lowland mature floating forest with old-growth characteristics in Classic U's 255 acres. This precipitated another look at land use in our state parks and evolved into the CAMP process.

The Navy's "proposal" violates CAMP plans in our parks. For example:

- In South Whidbey State Park, the beach access to the uplands is inaccessible due to failing bluffs and trails and stairway remnants have been closed to access.
 - o Navy SEALs can only get to the park, unless they drive in, from the water without ascending an off-limits bank.
- South Whidbey State Park is a day-use only park and most of the land is designated "Natural Forest Area" by the CAMP where users are urged to Stay On the Trails only.
 - o Navy SEALs want to use the park at night and bivouac in the NFA, which is not allowed to the public and not in the CAMP plan
- Manchester State Park is accessed by water via the day-use area of the park, closed to all but valid Washington Water Trails campers.
 - o Navy SEALs want to use this area that is closed to public use at night.
- Cliff climbing is a prohibited activity at Deception Pass State Park.

3 <https://www.southwhidbeyrecord.com/news/navy-sets-meeting-for-special-operations-training/>

o The staff report you are receiving today shows on Page 4 that the Navy SEALs want to do "tactical climbing" at Deception Pass State Park, an activity not allowed in the CAMP plan.

Navy SEALs operations threaten users of the Cascadia Marine Trail. As a sea kayaker and expedition kayaker with nearly 40 years experience; a member of your Paddlesports Advisory Committee and teacher of kayaking skills and safety, human-powered water sport safety is a prime concern of mine.

There is a very specific reason that reservations are not needed along our water trails sites. Marine weather in the maritime Northwest can be unstable, going from near flat calm to dangerous conditions in a matter of hours. To require reservations could tempt less-experienced paddlers to take chances to get to their campsite when they should stay ashore or change routes. There are already too many water-related deaths associated with small vessels.

Water trails sites and landings in our crowded Puget Sound are often many miles apart and most paddlers plan their routes according to their experience, stamina, range and weather conditions. Very often, a full day of paddling precedes reaching camp.

If they were to arrive at a site late in the day or at nightfall and find a SEALs operation with personnel instructing them to, as Navy spokesperson Murray stated, "stay back," where would they go? Attempt another site? Paddle off tired to try to find a landing? This is a recipe for a tragedy on the water.

No parks with Water Trails Sites should be included in the Navy's "proposal."

This would include Blake Island, Camano Island, Fort Ebey, Fort Flagler, Hope Island, Joseph Whidbey, Manchester and Skagit Island.

They simply do not need our state parks, except to surveil the public.

JUSTIFICATION

The Washington State Parks staff report has clearly been influenced by the Navy's reasoning—and the public has had, and continues to have, no venue for public participation or input to the material

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<p>presented in the report. For example, on Page 5 of the report it states, "The Navy did not request any sort of exclusive access to any of the park properties included in the report." The few examples I have provided show that this most certainly is not accurate. After the Navy's use of our parks—and plans for expansion—were made public by an investigative journalist, there was public outcry and then public was promised by the commission that any further use would be subject to a robust public process. This is now, apparently, being refused as the Navy presses for permission and the staff is eager to get on with business. Any action or consideration of the Navy's proposal must be, at least, rejected until a full, robust public process can be implemented and after COVID ceases to threaten us. There is no demonstrable need to subvert the public process except for the Navy's desire to surveil the state's park goers as they seek recreation, respite and the natural blessings of our state parks. Please reject this report and the Navy's "proposal."⁶³</p>
<p>State Parks Commission has obligation to serve and protect PEOPLE of Washington, NOT the federal government. Parks will be abdicating its responsibility by allowing war games in state parks. Parks are for people, not profiteering. Reject the Navy proposal to stage covert military exercises on state public property!⁶⁴</p>
<p>Please, please, please do not allow this noisy, polluting exercise to happen in our peaceful, beautiful area!⁶⁵</p>
<p>I live near many parks in NW Wa and the Navy is a blight on going out to enjoy them. You cannot have fun in nature when theres really loud noise and personal playing war. Our parks donnot belong to the military.⁶⁶</p>
<p>I'm against our peaceful parks becoming a place to train soldiers for combat.⁶⁷</p>
<p>PLEASE DO THE RIGHT THING! PUBLIC PARKS ARE FOR FAMILIES, CHILDREN, WILDLIFE TO FIND PEACE AND ENJOYMENT! THIS CANNOT OVERLAP WITH INTRUSIVE, HABITAT-DAMAGING, SCARY MILITARY EXERCISES- WHAT AN UNAMERICAN, SHOCKING AND HORRIBLE IDEA!⁶⁸</p>
<p>Do not allow the US Navy or anyone else to use our parks for navy operations⁶⁹</p>
<p>I don't want the military to practice in my state parks. I live on Whidbey Island and deal with the jet noise. The Navy base has already closed off a few of Whidbey's finest beaches to the public. Please don't take anymore of our states natural beauty.⁷⁰</p>
<p>I don't want the military to practice in my state parks. I live on Whidbey Island and deal with the jet noise. The Navy base has already closed off a few of Whidbey's finest beaches to the public. Please don't take anymore of our states natural beauty.⁷¹ <small>(duplicate from above but from two separate emails, same last name)</small></p>
<p>Please reject the Navy's proposal. The Puget Sound and our local parks are for THE PEOPLE and PERSERVING WILDLIFE SANCTUARIES. These trainings will hurt our local orca population and other wildlife. It's not worth it. The Navy doesn't deserve to train in our beautiful environment.⁷²</p>
<p>I strongly disagree with this proposal. The military should absolutely be kept out of our state parks.⁷³</p>
<p>Please do not conduct military exercises in our state parks.they are damaging to wildlife including flora and fauna. They are a danger to humans who love and want to preserve these natural sanctuaries. It is our tax dollars that maintain these parks and the public does not want our parks used in this completely damaging way. It is a betrayal of the public trust. Please do not use our public parks for military training exercises.⁷⁴</p>

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<p>I cannot think of a worse idea. This will ruin the tourist industry, will hurt the enjoyment of the local community, and will damage the environment. There are other places, far less costly and far more appropriate, to do such training. PLEASE DO NOT ALLOW THIS.⁷⁵</p>
<p>I oppose any expansion of the Navy training done in Washington State parks, especially simulated gun training.⁷⁶</p>
<p>This should be approved! This training is critical to our Special Forces and State Parks are open to all. This training will likely save lives and allow our forces to better approach a difficult mission.⁷⁷</p>
<p>Allow the SEALs to train! State Parks only get used during fair weather anyway. This training will likely be during inclement weather and nighttime.⁷⁸</p>
<p>The US Navy's use of State Parks to train Special Warfare should have no adverse impact since 1.) the nature of their training revolves around small unit tactics and the impact of their use would be minimal as they typically operate at a "leave no trace" level of environmental impact, 2.) the Department of Defense and specifically the US Navy have a longstanding history of being good stewards of the sea, 3.) previous historical practice of the Navy using State Parks land has shown there is minimal impact, and 4.) The use of State Parks land for Navy Special Warfare training is provided for and permitted by RCW.⁷⁹</p>
<p>I fully support the use of the selected Washington State parks for use by the US Navy special forces training exercises. We must maintain highly trained Navy special forces, which are made up of volunteers, as their expertise is essential to the safety of all Americans and its allies. Please allow this limited use.⁸⁰</p>
<p>I whole heartedly agree with allowing US Navy Special Ops personnel to utilize Washington State Parks for training. I understand the training provides for beach insertion and extraction, high-angle rope skills, and recon and surveillance among other special operations disciplines. Whether day or night, I encourage the WSP's to work with the Navy and scheduling training and locations with the focus on keep the Parks open to the public and when possible, encouraging the Navy training sessions to be somehow ""Posted"" as Temporary Training to keep the public from interfering. As a retired Firefighter/EMT-D/Rescue Team instructor, our Navy's Special Ops personnel would greatly benefit from training in the various outdoor terrains in our Washington State Parks, especially Washington States ample waterfront and in the mountains for practicing rope skills.⁸¹</p>
<p>Please do not grant permission for these exercises in our parks. There is plenty of land and shore on bases, why destroy what little peace we people, animals and plants can find in our parks by having the navy invade them? Will they remediate the damage they will do and the pollution they cause? Will they compensate the public for the lost opportunities while they take over or parks, the noise, the inconvenience? Who will have to clean up after them? Please allow our parks to be exactly that: parks for people, plants and wildlife.⁸²</p>
<p>No! None! Keep the Navy OUT. These are our, state parks. A place of refuge and peace, not war and violence.⁸³</p>
<p>I 100% support the Navy's use of the parks, if they are instructed not to damage/ abuse the park. As a veteran my self, I have done a lot of training like this... Most of the time it went smoothly and had no impact to the area. Other times though you end up have soldiers using the bathroom in the wood and have large mounds of poop everywhere. and just general destruction to the local plant life. As long as control measures are in place and soldiers are informed of those measures there would be no issue. This sounds like some super awesome training and would be very motivational to see! Can the training dates be made public?⁸⁴</p>
<p>Suggest the navy train on entering the US from Canada at the Boundary Dam (wading waters below dam) sort hike along west side of Pend Oreille with vertical cliffs near Metaline Falls. Not a lot of</p>

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<p>public activity sometimes of year. Opportunity to clean up camp site. Check with the green baret at customs in Metaline Falls.⁸⁵</p>
<p>The plan to have apparently armed people storming beaches in our state parks is an irresponsible and dangerous idea. This is not a reasonable use for our state parks. Scrap this plan immediately.⁸⁶</p>
<p>NO--The Navy has ample area to practice WAR GAMES. State Parks should remain as intended. A SAFE haven for people as well as the wildlife that inhabits the land. Heidi Jarvis--Bush Point.⁸⁷</p>
<p>As an avid user of the many beautiful state parks we have in the area I wanted to put in my 2 cents on the proposed Navy training at more parks, I think that it is a great idea for our military personnel to get as much training in more diverse settings and as long as we aren't prohibited from using the space while they are doing their thing I see nothing wrong with it.⁸⁸</p>
<p>I do not support having Naval training taking place within the State Parks. I would personally feel unsafe knowing that navy trainees could be watching me and my family while we enjoy our beautiful parks. I don't feel this proposal is in the spirit of what these parks are meant for.⁸⁹</p>
<p>I am strongly opposed to increasing the number of state parks and dates that the Navy trains at. The state's natural resources are not military spaces. residents of Washington should be able to recreate without necessarily engaging with the armed forces. The Navy has a long record in the state of Washington of being destructive and negative towards Washington wildlife, particularly aquatic wildlife such as resident orcas. It would not be in the best interest of Washington state parks to facilitate an increase contracts with the Navy for use of public spaces.⁹⁰</p>
<p>I strongly disagree with planned expansion of Navy training exercises to 29 Washington State Parks. The military has more than enough of its own facilities, in all areas of the state, where they can practice. Keep the military out of our state parks. They have already invaded the National Parks in Washington, keep them out of state parks. Here is a partial list of military installations they can practice in:</p> <p>The Army's number one power projection platform in Joint Base Lewis-McChord, the largest Joint Base west of the Rocky Mountains</p> <p>The Navy's third largest fleet concentration at Naval Base Kitsap</p> <p>The sole naval aviation asset in the Pacific Northwest at Naval Air Station Whidbey Island</p> <p>A Coast Guard district that supports homeland security for four states and patrols over 460,000 square miles of the Pacific Ocean</p> <p>Naval Station Everett, which is home to the aircraft carrier U.S.S. Nimitz and is the Navy's most modern facility</p> <p>One of ten U.S. Department of Energy national laboratories at Pacific Northwest National Laboratory</p> <p>The Applied Physics Lab at UW, one of five Navy-managed University Research Centers in the U.S.</p> <p>The Puget Sound Naval Shipyard, one of our state's largest industrial installations</p> <p>Fairchild Air Force Base, part of Air Mobility Command that provides strategic cargo and passenger delivery, air refueling and aeromedical evacuation, as well as support for humanitarian missions around the world</p> <p>Washington State Military Department utilizing state and federal resources to perform homeland defense, homeland security, and emergency mitigation, preparedness, response and recovery activities.⁹¹</p>
<p>The Navy's proposed using for Washington State Park land are incompatible with the purpose of State Park land and would be detrimental to the public. Many of the parks in this permit request contain valuable and increasingly rare shoreline habitat and I'm concerned that the navy's activities would degrade this habitat. I'm particularly concerned about how craft and personell used in "Over-the-Beach" and Insertion/Extraction training would disrupt shoreline habitat. The Navy's actions will also</p>

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<p>pose a hindrance to the public enjoyment and recreation in State Parks land. I could understand allowing this use during a time of war, but not while we are not at war.⁹²</p>
<p>train to be the best they can be⁹³</p>
<p>The Navy currently has a Right of Entry permit that allows it to conduct similar trainings in five Puget Sound area state parks. That five-year permit expires May 1. What is the feedback from these state parks? Has a survey been taken from visitors to these parks? Will they be restricted to remote parts of the chosen parks so as not to fringe upon the visitors⁹⁴</p>
<p>I disagree with providing more state park facilities to the Navy. They will demand exclusive use during their training exercise. The state park is for the use of the public. While it is becoming too expensive for some it is the best we have got.⁹⁵</p>
<p>I am a member of a hiking group which frequents Deception Pass State Park. I am rather shocked at the size and scale of the proposed "Navy Training Proposal". The Navy wants to use the park between 3 and 36 times per year, at 2 to 8 week periods and up to 84 Navy Personnel. The time frame is Jan-May and June - Nov. this sounds like a complete takeover of our beautiful, fragile, peaceful (except for the Growlers) park. I say No! What will the effect be of 84 people climbing, scrambling over the beautiful rock cliffs, tramping on the soft root and rock filled trails. I say this is too much! Up to 72 hours at a time! Up to 36 times a Year! This is not the Navy's personal training ground, it is for the enjoyment of residents and visitors.⁹⁶</p>
<p>Not only no, but Hell No!. The justifications are fatuous assuming no one will question a request by a branch of the federal government. We have a separation between the state and federal functions and properties for a reason. In the current political environment it is extremely important to refuse federal overreach by all means possible. The military has their own extensive reserves for this purpose and should not be allowed an effective taking of our state lands set aside for civilian/public use under any circumstances.⁹⁷</p>
<p>I do not want to have the navy invading our state parks for their special operations. I am already so impacted by the loud, disturbing, ear damaging sounds from the planes that fly over where I live. I am already unable for most of the time able to enjoy the most beautiful park in Washington, Deception Pass State Park because the noise is so loud it hurts my nervous system to go there and I feel it is also hurtful to my family. So to think of giving the navy one more invasive door into my life I find absolutely a NO GO. How about they do their training over desert areas, places where no body lives. How about they climb the cliffs out on the pacific coast. The military owns so much property in the United States they should use what they have, not what I as a TAX Payer support (The State Parks) for their training. I do not support their operations in our parks.⁹⁸</p>
<p>No military practices in our State and National Parks!⁹⁹</p>
<p>I strongly object to the use of public parks in Washington State as Naval Warfare Training grounds. There are mountains of evidence detailing how harmful these activities would be. You have that evidence. I hope you will do the right thing by not kowtowing to the military industrial complex and saying no to this heartbreaking misuse of the public trust.¹⁰⁰</p>
<p>I strongly object to the use of public parks in Washington State as Naval Warfare Training grounds. There are mountains of evidence detailing how harmful these activities would be. You have that evidence. I hope you will do the right thing by not kowtowing to the military industrial complex and saying no to this heartbreaking misuse of the public trust.¹⁰¹</p>
<p>I am writing to oppose the Navy Training Proposal requesting to expand its Special Operations Training to 29 state parks. I don't believe that there should be any military training in any state parks anywhere. State parks are places where we should preserve our environment and ecosystems to our utmost ability while still allowing engagement with members of the public for recreational and educational</p>

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<p>purposes. My understanding that there is danger from military operations to the environment. Meanwhile such training is not conducive to public access and engagement in their state parks.¹⁰²</p>
<p>I am unable to attend the meetings. I strongly object to military exercises in our parks and that includes the fly overs by noisy, noisy jets.¹⁰³</p>
<p>To the best of my knowledge, our parks are designated in order to preserve wildlife habitats and for the sake of personal recreation and appreciation of nature. Limits are set on the types of recreation allowed at these parks for the sake of protection of these precious ecosystems. That being said, I don't think the parks were intended for military use, and I would only approve of such use if paid park rangers (with law enforcement certification) are present at all times and locations of training and the officers in charge of training are instructed to follow the rangers' orders regarding rules of use of the parks. Violation of such rules would invalidate the agreement to use the parks for military use. Without the presence and authority of park rangers during military exercises, I am against this proposal.¹⁰⁴</p>
<p>Do not allow armed services in our parks. Those spaces are for the people to enjoy and take their families. Military exercises do not belong among families having a picnic.¹⁰⁵</p>
<p>I am strongly opposed to the navy using our public parks for training. The military already has a lot of land on which to do training, and there are an insufficient number of parks. Deception Pass State Park is my favorite park but the growlers' deafening noise has made it an impossible place in which to enjoy recreation and nature. Similarly having the military scale cliffs or otherwise be present in our parks conflicts with their purpose. I would hope that since the navy has access to great areas already under military control that training be conducted in places away from populated areas and those areas set aside for peaceful recreation. I moved from Whidbey Island about 12 years ago to get away from jet noise. Now the growlers are often heard over Mount Vernon where I now reside. Where will the encroachment stop.¹⁰⁶</p>
<p>Keep the Navy on Navy beaches. Keep the people on public beaches.¹⁰⁷</p>
<p>I am appalled that the Navy has been allowed to greatly disturb peoples experience of nature in the park all of the animals existing and trying to be at peace and harmony in their natural settings I find it greatly disturbing and demand that the Navy not be resubmitted to allow their great disturbance. Please do not renew their contract To rattle and shake and disturb the Olympic national Park.¹⁰⁸</p>
<p>No. Do not allow the military to continue using our state parks. Our state parks are intended to be used for a completely different purpose than military training. Damage and habitat disturbance or destruction will happen with military use. No. The military owns huge amounts of land and can easily use that for their training. Period. Keep our parks neutral and weapons and personal and equipment free. Thank you.¹⁰⁹</p>
<p>Please do not renew the access to our parks for military exercises. The should be a sanctuary for flora, fauna, and people to use peacefully not for practice for war.¹¹⁰</p>
<p>State parks and state lands are not a place for military exercises. The military has a much too large foothold already in our state. Flying over our public and private lands with excessive noise, emanating electronic warfare frequencies, disturbing sea life and marine mammals with sonar and explosives should be more than sufficient abuse, shouldn't it? There are plenty of places across the world that are owned or controlled by the military for people to 'train'. Deception Pass State Park is already inundated with aircraft noise from NAS Whidbey, as are the smaller state, county, and city parks in the area. We do not need uniformed soldiers with weapons storming our beaches, hiding in our underbrush, or scaling our rock formations along with the shock and awe of the growlers. When will enough be enough? I say we are already past that point. Please do not permit the military to abuse the citizens and property of Washington State any longer.¹¹¹</p>
<p>NO military exercises in Washington State Parks!¹¹²</p>

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<p>As a longtime resident of Seattle and San Juan Island, and a user of our national parks and monuments and a friend of wildlife, I oppose the use of public parks and lands by the US military for any purposes. These lands belong to the people and are a sanctuary for wildlife, native flora, fauna, and microorganisms, and for humans.¹¹³</p>
<p>I am writing in opposition to military exercises in our state parks. In this pivotal time in human history, we need to be building bridges with other countries and reducing our fossil fuel use. My family and I find the military training invasive of our enjoyment of public land and a waste of energy and peace-building efforts. Please do not renew or expand the permits for the military to use our public spaces of peace.¹¹⁴</p>
<p>Our state parks are a place to enjoy the peace, beauty and tranquility of nature, NOT for military/navy exercises! Please do NOT renew the permits.¹¹⁵</p>
<p>I strongly object to permitting Navy use of State Parks for military training of any sort. Noise from Navy training has already had a negative impact on our Olympic National Park. Extending that impact of noise or other training use to State Parks must not be allowed.¹¹⁶</p>
<p>As a Veteran with PTSD I find it abhorrent that I might be assaulted with possibility while enjoying a much needed reprieve in the wilderness of the Olympic Mountain range or anywhere near these beautiful serene quiet places of Washington State. I am a Veteran with 100 percent disability due to MST and PTSD. I can not imagine Veterans who have had trauma from military combat out there trying to find peace in the many beautiful parks, then being re-traumatized by military training. What are you thinking allowing this! It is totally outrageous!¹¹⁷</p>
<p>Olympic National Park is the primary draw of visitors to the Olympic Peninsula. This park should be preserved in its pristine state quiet and dignified in all its beauty.¹¹⁸</p>
<p>Please don't renew the Naval permit for training in state parks. Keep military exercises out of public-use land.¹¹⁹</p>
<p>I am very opposed to taking the proposed covert military training operations into Washington State Parks. This is such a bad idea for many reasons that are not even necessary to delineate - for starters, the potential for scaring or hurting locals and tourists. There are so many wilderness places in Washington where these training operations could be done. There is no need to do them at Washington state parks.¹²⁰</p>
<p>I oppose the renewal of the Navy's permit for training in Washington state parks, particularly the proposed expansion of locations, and surveillance activities. Park visitors deserve a natural experience, not surveillance.¹²¹</p>
<p>There is no reason the military should be using our parks for their exercises. This is absurd! Please do the right thing here and stop this practice!¹²²</p>
<p>I feel the Parks are for the purposes of recreation and habitat preservation. Military flyovers are detrimental to both. There are plenty of places the military can fly and I don't believe parks should be among them. I believe this is a power statement by the military and nothing more.¹²³</p>
<p>Low-flying between foothills and mountains? We almost had one moron military pilot hit the ridge behind our house in the fog. We love fireworks. We're getting popcorn. ;D Speaking of fireworks, one local nitwit military fan girl wants you to fly a helicopter over Sekiu during Fun Days. They're panting after their own Death Wall up here, like Forks - this should give them a doozy.¹²⁴</p>
<p>Do not renew the military 's permit to access public parks! People don't want this, its a park!!! ; a public place for recreation, not war testing..its just plain wrong. Please listen to the public. It is so disrespectful to the people and the wildlife that never has any say.¹²⁵</p>
<p>I was appalled when I first heard that the military was using our parks, boat ramps, etc. for night time exercises and training. I have been against the practice ever since. Their excuse that they need to train</p>

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<p>under ""real life"" scenario's is a very weak excuse. Parks are Parks and there should be no place or need for military training in their midst.¹²⁶</p>
<p>I oppose Naval training in our WA State parks! It is n to good for the health of our parks, our animals, our flora, or our park visitors. While I honor our service men and women and support adequate training, I believe military operations and clandestine exercises impacting unsuspecting civilians is contrary to the Washington State Parks' rules, goals and mission. Our state parks are visited by millions of residents and tourists each year and are a huge economic stimulus to local business. If these public recreational spaces become military training grounds the businesses that rely on those visitors will very likely be damaged. Please conduct a full Environmental Impact Study (EIS); broad public notice and engagement; and a full cost and benefit analysis before any permitting is pursued.¹²⁷</p>
<p>Navy training will negatively impact the wildlife in this area, in the oceans and in the parks. It will ruin the integrity of these parks which are meant to be places of refuge and peace to enjoy nature. Furthermore, this impedes on the quality of life of Native communities that live in these areas, that have the right to decide if they want this in their day-to-day lives. Navy training is violent, it is training for war, and while I commend those that choose this profession to be in their lives each it is traumatizing for those of us who do not choose it but must have it within our space daily. There will be no peaceful places for our kids to be, war will now be a part of our lives each day without our choice. This must discontinue. The well-being of our citizens and our wildlife must take precedence.¹²⁸</p>
<p>Our beautiful and abundant world is being decimated by those who seek profit and control, at the expense our ecosystems and environment. Instead of focusing on Our part of the world and recreating bounty to share, we've been FORCED by the Militant Industrial Complex and Corporations to DESTROY OURSELVES and submit to war. NO!!! PROTECT and HONOR LIFE!!! WE will ALL be ultimately judged for Our Individual Actions. STOP OBEYING IMMORAL ORDERS! TIME TO GROW UP! WE ARE ONE, AND OUR NETWORKING ENERGY WILL EITHER CONTINUE TO DESTROY OR SAVE US.....VOTE WISELY!¹²⁹</p>
<p>It's bad enough that my house rumbles several times a day as jets travel overhead... I certainly don't want to see or hear anything related to war games when visiting designated nature refuges!¹³⁰</p>
<p>I am opposed to renewing the Navy's permit for military exercises in our state parks.¹³¹</p>
<p>DO NOT GIVE ANY PERMIT RENEWAL TO ANY MILITARY FOR ACCESS TO OUR PUBLIC SPACES! WASHINGTON IS A SAND YOUR GROUND STATE AND IT IS ABOUT TIME FOR THE WASHINGTON STATE PARKS TO STAND THEIR GROUND AND TELL THE MILITARY TO STAY OUT NOW AND FOR EVER!!! While we honor our service men and women and support adequate training, we believe military operations and clandestine exercises impacting unsuspecting civilians is contrary to the Washington State Parks' rules, goals and mission. Our state parks are visited by millions of residents and tourists each year and are a huge economic stimulus to local business. If these public recreational spaces become military training grounds the businesses that rely on those visitors will very likely be damaged. We must demand a full Environmental Impact Study (EIS); broad public notice and engagement; and a full cost and benefit analysis before any permitting is pursued.¹³²</p>
<p>Please!!!! DO NOT RENEW THIS CONTRACT WITH THE NAVY!!! Having them fly above our lovely parks is a real invasion for us and we don't see any evidence that they need to be here, in our parks. The noise is very DISTRACTING and it is a frightening sound for people and wildlife. When they fly, they fly at all hours of the day AND night. This is very invasive. PLEASE!!! Listen to the people!¹³³</p>
<p>"I encourage you to do a full environmental impact study on effects of Navy training in US Parks. Along with the prima facie observation that US Parks are for people to enjoy - not for military training - it is clear that training in Parks will lead to pollution. In the same way that the Growlers training over the Olympic National Forest (read: Park) create noise and environmental pollution, training of any kind is likely to have an environmental impact, including pollution.¹³⁴</p>

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<p>I am totally OPPOSED to any military training exercises in ANY of our Washington state parks. PERIOD. NO EXCEPTIONS.¹³⁵</p>
<p>While we honor our service men and women and support adequate training, we believe military operations and clandestine exercises impacting unsuspecting civilians is contrary to the Washington State Parks' rules, goals and mission. Our state parks are visited by millions of residents and tourists each year and are a huge economic stimulus to local business. If these public recreational spaces become military training grounds the businesses that rely on those visitors will very likely be damaged. Keeping the Olympic Peninsula as a pristine ""habitat"" is for the well-being of many species and humanity. Please DO NOT USE THIS AREA for military fly-overs and testing. Thank you.¹³⁶</p>
<p>A full Environmental Impact Study (EIS) must be done, and broad public notice and engagement, and a full cost and benefit analysis before any permitting is pursued or issued.¹³⁷</p>
<p>By this memo I wish to voice my opposition to a renewal of the permit to the Navy to access our state parks, particularly given the expansion of place and use such a permit would give. I honor and support the men and women in our armed forces. My husband is a retired Navy captain. But I am also a citizen of the State of Washington who believes the Navy's request is incompatible with the use of our state parks. By definition, our parks are open to the general public for the public to use for recreation. The Navy's request is an infringement of that use. Expanding their current use flies in the face of your responsibility of stewardship of the parks and for public use.</p> <p>Consider: The American military now has access to many thousands of acres of wilderness for training purposes. In Washington alone, the military has access to over 497,000 acres PLUS 500,000 acres used for SERE training near Fairchild AFB. The military also has access to acreages in other states. The State of Kansas for example, hosts Fort Riley, home to the Big Red One First Infantry Division. Fort Riley spans two counties and includes over 107,000 acres.</p> <p>With the current emphasis on joint commands and joint operations, there is no reason the Navy cannot use parts of such huge military bases for training purposes. Please compare the acres our public can access through the parks you are mandated to protect: 120,000. Then consider the millions of acres one branch of the military can access. Please deny the Navy's request to expand its access to and use of our precious state parks.¹³⁸</p>
<p>Please keep the military out of our public parks for their training exercises¹³⁹</p>
<p>Parks were established for the public not as Military exercise fields. There are more than enough military exercise fields established; there is no need for more! This endangers not only the general public who use parks but also the parks themselves.¹⁴⁰</p>
<p>Please stop turning our parks and recreation destinations into more military playgrounds. The country has already designated huge swaths of public lands across America for military training and it is never enough. Now they continue to encroach in the airspace of those places that were set aside for recreational opportunities. The military industrial complex continues to devour huge amounts of taxpayers money, spoils the solitude that once used to be an expectation of visitors to these parks and open spaces and contributes to many aspects of environmental degradation. It is my understanding there is usually overwhelming public opposition to these permits and yet they seem to be granted without exception. I'm not even sure why I bother with signing petitions or writing letters any more except that I keep hoping at some point reasonable people will see what is happening to OUR public lands and return the training to areas that were set aside for that purpose.¹⁴¹</p>
<p>I am not sure who determined this was not impactful on our environment here in the PNW. We have huge military reservations where the Navy can practice. That includes the damned planes. I have seen both goat and elk spook from low flying fighters over the ONP. The navy needs to be reminded that this is a civilian led government and that our military is but one arm in our arsenal of democracy. This ain't Russia.¹⁴²</p>

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I am against the US Navy utilizing state parks for their training. The request of the US Navy does not align with the Mission and Vision statements of the State Parks.

MISSION

The Washington State Parks and Recreation Commission cares for Washington's most treasured lands, waters, and historic places. State parks connect all Washingtonians to their diverse natural and cultural heritage and provide memorable recreational and educational experiences that enhance their lives.

VISION

Washington's state parks will be cherished destinations with natural, cultural, recreational, artistic, and interpretive experiences that all Washingtonians enjoy, appreciate, and proudly support.

Military training should be done on base, not in state parks. I am concerned about environmental impact and the safety of park goers. Our tax dollars are used to support the state parks and we still have to pay to park there. Why would the military be allowed to use the area free of charge? The military does not allow civilians on base to enjoy their facilities, so why should they be allowed to use our state parks? This is just going too far.¹⁴³

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"While we honor our service men and women and support adequate training, we believe military operations and clandestine exercises impacting unsuspecting civilians is contrary to the Washington State Parks' rules, goals and mission. Our state parks are visited by millions of residents and tourists each year and are a huge economic stimulus to local business. If these public recreational spaces become military training grounds the businesses that rely on those visitors will very likely be damaged. We must demand a full Environmental Impact Study (EIS); broad public notice and engagement; and a full cost and benefit analysis before any permitting is pursued.¹⁴⁵

Having had the good fortune to spend some time on the Olympic Peninsula and in some of Washington state's parks, I have deep reservations about the proposed expansion of US Navy military training exercises in the state's parks. I have hiked into secluded areas in the mountains for a weekend of camping and quiet recreation, only to have a couple of CH-47 cargo and troop transport helicopters full of soldiers in training descend upon the area and completely overwhelm the peace and quiet, not to mention the environmental impacts of such a sudden and large influx of people whose activities are inconsistent with maintaining the quality of wilderness experience. I urge you to not renew the permit for these training exercises, much less allow for expansion of them. What is needed is a full Environmental Impact Study (EIS); broad public notice and engagement; and a full cost and benefit analysis before any permitting is done. is pursued.¹⁴⁶

Please don't renew the contract for the Navy to use state parks for military training. There are military bases for this purpose.¹⁴⁷

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<p>Please do not renew the military permit. We do not need more noise in this peaceful place. We moved here for the quite.¹⁴⁸</p>
<p>Tell the Navy to go play somewhere else. Parks are for recreation. They shouldn't be for war games.¹⁴⁹</p>
<p>I oppose the military use of state parks of Washington. The military has no place in the parks. This land should be reserved for citizens and families. It is destructive to our communities and the wildlife to allow this type of activity in the state parks. I hope you will vote to support the citizens of our state not federal government agencies that don't respect the quality of our lives in our communities.¹⁵⁰</p>
<p>NO MORE PERMITS FOR MILITARY EXERCISES¹⁵¹</p>
<p>The US Navy needs to leave Washington State Parks alone. They are paid for and for Washington State residents.¹⁵²</p>
<p>I oppose Naval training in our parks not only in Washington, but the Federal parks as well in other states. I believe these spaces are best used by the population to renew our mental resources and provide humans and animals a place to be away from intrusion. And keep the parks separate especially from intrusion by war game and destruction bent exercises that the Navy continues to expand and study. Get war games out of Washington State parks, please.¹⁵³</p>
<p>I am urging you to deny the Navy's request to expand its Special Operations Training to 29 state parks.¹⁵⁴</p>
<p>Concerns regarding military training in public parks have been expressed and documented over the years. It appears the Navy wants even more access to our beloved parks. The Commission should consider all doubts and concerns as standing on the principle of first do no harm. The Navy is in the business of training people to do harm and for the Commission to permit them to bring their activities into public places is harmful to the core of the mission for which you are responsible, for providing and sustaining ...a genuine love for state parks as stated in your Strategic Plan: The Washington State Parks and Recreation Commission cares for Washington's most treasured lands, waters and historic places. State parks connect all Washingtonians to their diverse natural and cultural heritage and provide memorable recreational and educational experiences that enhance their lives. The permit issued by the Washington State Parks Commission for Navy training activities will expire as of April 30, 2020. This is the appropriate time for the Commissioners to rule in favor of increased customer satisfaction. Numerous residents and visitors presented public comments for the need to reject the Navy's request for the previous five year permit; now the Navy wants access to over 25 public parks for increased military training. Specifically such permitting should not be granted because it is not a ...compatible revenue-generating purpose; even if they claim it is invisible - so are drones. The civilian population supports public parks but not unseen invasions by the U.S. military. Public tax monies have provided the Pentagon with hundreds of globally arrayed bases covering thousands of acres of land with shorelines specifically for on-going training and war readiness. Although some taxpayers think this is necessary there is no avoiding that such operations bring environmental and psychological damages with resulting expenses while ostensibly defending lands and people all over the world from enemies and protecting access to raw resources. The Navy's request does not present any justifications that are unique to our public parks and not already available at established military bases. To allow such training on civilian lands within the continental U.S. furthers a culture of priority and usurpation projected to fend off an invading ground army. An invasion like this from an other has long since become improbable in the 21st century. Further, congress people have voted to finance military and private contractors providing weapons along with training and covert operations in other countries so that the fight against the enemy will happen over there, not here. Finally, the most obvious agenda for Navy SEAL training in Washington State Parks can only be a speculation. The majority of civilians the Navy trainees will be observing without being observed are</p>

humans with very light skin and body smells of diets comparable to that of the trainees. One could conclude that the Navy wants to practice maneuvers that are relevant to a white, western culture. Why would that be?

Surely, permitting this type of activity would not encourage your mission to "promote meaningful opportunities for volunteers, friends and donors." The Commission must weigh all concerns, not simply permit fees or some imagined priority for the military. The Navy SEAL's training on the public's lands is unacceptable. Permitting for increased military presence within some 27 parks should not be granted.

Wikipedia: SEALs are primarily tasked with surveilling, capturing, or killing of high priority targets, and gathering intelligence behind enemy lines on enemy forces, locations, and activities for future military actions.

The navy documents describe the SEAL activities:

The training involves small-units of personnel. The intent of the proposed training is to: 1) teach trainees the skills needed to avoid detection, and 2) not leave any trace of their presence during or after the training activities. The undertaking does not include the use of live-fire ammunition, explosive demolitions, manned air operations, off-road driving, vegetation cutting, digging, tree climbing, the building of camp fires, or the building of infrastructure. The two regions identified in Enclosure (1) offer unique conditions, which create opportunities for realistic and challenging special operations training in a safe, sheltered, coldwater environment. The combination of military presence in proximity to sites with diverse shoreline terrain, hydrography, and bathymetry is vital to the progressive improvement of skill sets and readiness requirements. Additionally, the close proximity to several existing Navy installations maximizes logistics, safety, and security. As specific training objectives are identified and scheduled, compatible sites within the two regions would be selected to support the activity. The purpose of the proposed undertaking is to support small-unit training activities of Navy Special Operations personnel in maritime and land training environments. The need for the undertaking is to provide capabilities for training and equipping combat-capable special operations personnel ready to deploy worldwide.¹⁵⁵

I believe that funding for State Parks should be paid for by State Taxes and increased every year equal if not more than taxes for DOD. If we pay 2% of our annual income for DOD then we should pay 2% of our annual income to our State Parks. They are a TREASURE and essential for peace, well-being, rejuvenation through the sight of beauty and sounds and feel of the natural world. They are a place for dreaming, and a place of meeting to enjoy recreation, not work like what the Navy wants to do. It is for us to get away from the working world and all the intensities that come along with it. I hope you really consider what kind of environment Special Forces Training creates in a park setting. These State Parks are not enhanced by soldiers practicing attack and defense strategies and soon to be Ninja warrior spectator events. The military is seeking to be on a grand stand although it is claiming for superior training grounds. They are taking advantage of a quiet space and want to be rewarded.

I regularly host people from foreign lands who all want to come and hike and enjoy America's Parks and are dismayed by the military intrusion which you can hear across many State Parks and National Parks. I don't support this at all.¹⁵⁶

I am completely opposed to allowing covert Navy training in Washington State Parks. Our State parks belong to us, the residents of Washington and not to the US military which already owns lots of land and shoreline in our state. Their alternative #1 fulfills their needs though it is not as "flexible" as using everyone else's land. Our State Parks are a place of refuge, escape and relief from the stresses of life and being covertly surveilled by camouflaged military is not relief from stress. I trust that as stewards of these precious lands that you will protect them as parks, not military training grounds.¹⁵⁷

The Navy Seals should be absolutely be allowed access to any and all state parks and other state lands for training purposes. They are a vital element of our nations defense system. If a terrorist group

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attacked Washington's ferries or any of the numerous water related assets in Washington, the Seals may be the organization called upon to advise or eliminate the problem. As a Navy veteran, I 100% support the Seals and other military organizations who are defending America. ¹⁵⁸
There HAS to be other, less populated places that the Navy can train. ¹⁵⁹
I am fully in support of the Navy proposal. ¹⁶⁰
I am opposed to our state parks being used by the military. ¹⁶¹
I oppose Navy training in Washington State Parks. There are lots of other places where training exercises can be done. State Parks should be left for the preservation of the environment and/or for public recreation. I believe Navy training in Washington State Parks would negatively impact the Park environment and civilian enjoyment of these preserved spaces. ¹⁶²
The state parks are our refuge, our escape, our brief chance to be in contact with the natural world and the beauty of Washington. They are a sacred trust and many of them would not exist if not for the passion and hard work of people who love these special places. A military use is not only totally incompatible with the mission statement of the state parks...but also of the wildlife and the people who enjoy the parks. Noise and human activity is very disruptive to wildlife and would cause stress and reproductive failures to birds and animals. For me and my family, it would be very extremely upsetting and depressing to have our time in the woods and parks ruined by the presence of military maneuvers. These wonderful places have been preserved for the people of Washington. ANY active military presence would totally change the character of the parks and destroy this legacy that should be passed down to our children. Allowing the SEALS into our parks is simply not right. This is a challenge to the park system to make a difference and DO THE RIGHT THING. ¹⁶³
Allowing the Navy to train at state parks is going to hurt the environment for visitors, campers and wild life. I don't know what the Navy is willing to pay to do this, but is it worth the deterioration of the state park experience? ¹⁶⁴
I am a U.S. Air Force vet but feel the Navy SEAL training is invaluable and should be allowed as often and in locations where the Navy seems appropriate. Yes, allow SEAL training so those brave souls have the ability to protect our backsides. ¹⁶⁵
I support the US Military, but am against using protected areas of national or states parks for military exercises. Our wildlife and parks need our care and protection not exploitation. ¹⁶⁶
We need to be of a mindset of peace not war. And while the US will not be eliminating it's military any time soon, expanding training, especially at the detriment of the public, is not what our parks should be supporting. Navy training in public parks is damaging to nature and to the public. Scary scenarios for visitors, accidents or unintended consequence are easily imaginable. Private property owners or timber land owners are a much better place for these kinds of training. Not where families go with their children and to walk their dogs. I strongly appose Navy Seal training in our state parks. Please don't approve this request. Thank you and peace be with you and in your heart. ¹⁶⁷
When the 2018 Navy Proposal came about, I found it alarming that the Navy was using beaches and night training areas in five state parks and certain shorelines. This proposed expansion of activity is even more alarming. I don't find it good policy to have the navy doing silent operations on state Parks beaches. Period. In addition, my work with the Washington Native Plant Society to protect, bring back and maintain coastal flora in specialized areas such as Point Wilson at Fort Worden makes this additional proposal more alarming. Coastal plants special to beach strands such as Point Wilson have been recognized since the 1990s, and active conservation efforts have been going on since 2006. In 2011 and 2012 members of the US Fish and Wildlife Natural Heritage Program John and Rare Care Wendy Gibble identified the sand verbena moth Copablepharon fuscum that lives solely on the yellow sand verbena for its lifetime. Fort Worden's Point Wilson was one of the 8 places it was known to exist. In the 2015 State Wildlife Action plan Appendix A-5 species of Greatest Conservation Need

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(Appendix A-5 Invertebrates) it was listed as candidate status by the state and in review for federal conservation listing. The status likely has not changed, due to lack of funding, but the protection of special species on our public park lands in addition to the protection of park visitors merits a careful review of this alarming increase of Naval use for night time and additional training on State Park shores.¹⁶⁸

You MUST NOT allow the Navy to conduct training in state parks!!! Of particular concern is the use of the use of unmanned aircraft, i.e., noisy drones, in Washington state parks, including those on Camano Island, where I live, for 72 hours at a time, day or night, whenever they want, for the next five years. This is an OUTRAGEOUS VIOLATION of the whole purpose of state parks, which are there for public enjoyment, NOT military training. A family outing at a state park emphatically does NOT include being buzzed by drones and watching military maneuvers. People who live nearby must NOT be required to put up with 72 hours of constant noise and disruption. The Navy already has plenty of places to practice its drills on Whidbey Island and elsewhere. Enough is enough! This plan is an outrage to citizens and you must end it immediately!¹⁶⁹

I am writing in support of the Environmental Assessment (EA) for Naval Special Operations Training in Western Washington State. I know that the proposed training is critical to ensuring that Naval Special Operations personnel continue to maintain a high degree of readiness and that the proposed Washington State locations provide unique attributes not available in other U.S. locations. Although I do not live in Washington State I visit there frequently and have witnessed similar training in other locations. To my knowledge those training activities have not adversely impacted the surrounding communities or park users and typically go unnoticed by the general population. I hope the Washington State Parks and Recreation Commission will support this important national defense readiness training proposal.¹⁷⁰

As someone who has visited Washington State numerous times, both for business and for tourism, hiking, etc., I would be very disappointed if the State of Washington in any way hindered the ability of U.S. Navy forces to train in and around State Parks. Having reviewed the Environmental Assessment, it is obvious to any unbiased reader that the planned actions would not be harmful to the parks, park visitors, or the environment in any way. Any group or individual claiming otherwise is merely trying to use the NEPA process or the State Parks as a weapon against the men and women who serve their country in the U.S. military.¹⁷¹

I strongly urge that the US Navy not be permitted to expand their training operations into our state parks. Will the public be prevented from using the areas where the Navy will be training? The Navy has plenty of their nearby properties which already have been strictly off limits to the public. These properties have the same habitats for their training exercises. What urgency should allow them to now need to use our state parks? Where in the mission statement of Washington State Parks does it describe their use as military training grounds, especially in parks that have thousands of visitors per day seeking to experience nature, peace and quiet? As a past employee of Deception Pass State Park I can state that the Navy's presence adjacent to and over the park has been the single most influencing factor whether I would enjoy my workday or time off in the park that weekend . Please don't allow the Navy now in addition to actually occupy the park.¹⁷²

We live on Camano Island and frequently visit our two state parks. We totally support the Navy's proposal to use these parks to train our military. Our local first responders are often seen training off these parks and no one ever objects. CISP has a large dock/ramp for staging. It should be very suitable for the training exercises.¹⁷³

I support the Navy proposal to use state parks for training purposes. Most training would be done at night and not even noticable for civilians. Our military put themselves in harm's way to protect us. They

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<p>deserve the best training possible. I am sick and tired of the selfish NIMBY's who deny best training opportunities for our soldiers, sailors and aviators.¹⁷⁴</p>
<p>Parks are not for military exercises. They are for the public to enjoy. There should be no threat of someone hiding behind a tree. Park forests are not to be ruined by intruders. Parks are not a place for military games. I want a thorough EIS before a decision is made.¹⁷⁵</p>
<p>I consider the proposal an outrage! There is desolate land in the West where no one lives that can be used by the Navy. Instead it wants to despoil parks and whatever tranquility people enjoy in their homes? No, a thousand times, NO!!¹⁷⁶</p>
<p>Washington State Parks and Recreation Commission, please. Do not renew the military's permit to access our public parks! This has been extremely disruptive. Please, do not renew it!¹⁷⁷</p>
<p>Please do NOT allow our state parks to become military training grounds! I use the state parks in my area year around for peaceful contemplation of nature and viewing wildlife. Having military training would disrupt the wildlife, ecosystem, and destroy the peace I seek within the parks. It's bad enough that I have growler jets and military helicopters coming over my house at unexpected times then to add the places I go to escape the chaos of the world makes me feel I am living in a war zone. NO MILITARY TRAINING IN OUR STATE PARKS PLEASE !!! The military's history for listening to public concerns is dismal and I don't trust that they would not damage and destroy public lands.¹⁷⁸</p>
<p>Please allow the Navy to participate in ANY and all programs within the state park system. Anything we can do to keep our young men and women well trained and safe is okay with me. I am more than happy to share the park with them.¹⁷⁹</p>
<p>I am against Navy use of the state parks.¹⁸⁰</p>
<p>Navy Training Concerns at Fort Worden Historical State Park</p> <p>A current Navy proposal submitted to the Washington State Parks & Recreation Commission requests access to multiple State Parks in western Washington for special operations training exercises. Fort Worden State Historical Park (FWHSP) is one of the parks included in the proposal. While we understand and accept the need for military readiness and training, there are many unique aspects of FWHSP that make it an inappropriate location for the kind of training that is described in the Navy proposal.</p> <ol style="list-style-type: none">1. Eagle nest exclusion area (February-August): An active eagle breeding nest is known to exist about 200 feet east of Battery Tolles. Using the 1,000-foot perimeter exclusion requirement, Navy training should be excluded from much of the north shore beach and from Batteries Tolles, Benson, Ash and Quarles during breeding season.2. Unstable bluff area: The high bluffs above Point Wilson are mostly sand and are subject to erosion and frequent landslides. No training activity should be allowed on or near these bluffs.3. Sand verbena restoration area: The sand verbena moth is an endangered species that is dependent solely on the sand verbena plant for survival. (Protected conservation status application is pending with the US Dept. of Fish and Wildlife.) Sand verbena grows in only a very few areas of appropriate habitat scattered around the Salish Sea. The Point Wilson beach at FWHSP is one of these areas. Many local volunteers have worked countless hours over the past 25 years to control invasive species in order to restore and protect this fragile habitat. Nighttime training exercises in this area would likely do irreparable harm to these species and would undermine the ongoing efforts of the many dedicated volunteers.4. Beach Campground area: This campground has campers year round with the presence of the public 24 hours per day. The likelihood of military interaction with Park visitors in the campground area would be significant, and these visitors should not be subjected to potentially frightening or unsettling experiences.

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5. Forest Campground area: As above, though this campground is closed in the winter.

6. FWPDA managed area: The Fort Worden Public Development Authority currently faces a challenging mandate to manage the hospitality concessions and the Life Long Learning Center under a Master Lease agreement with WSP&RC. The publicity that would arise as a result of the Park's use as a military training site could well undermine the PDA's economic development plans and hinder the long term preservation of this historic park. Military training exercises would not be appropriate on the PDA managed campus due to the continuous presence of Park guests and visitors and the frequency of public events and activities within the Park.

7. Urban park location: Unlike the other state parks included in the Navy proposal, FWHP is an urban park located entirely within the city limits of Port Townsend.

In view of the multiple areas within Fort Worden where the proposed training would be potentially harmful or dangerous, we strongly urge the Commission to exclude FWHP from the Navy training proposal.¹⁸¹

As a former resident of Washington State and a present resident of the Monterey Bay area of California, I wish to oppose the expanding presence of military activity in the parks and waterways surrounding Washington State. I live near, and have worked on the former Fort Ord military base, and presently live 200 ft. from military housing. In both cases the footprint of the military persist and are shockingly damaging to the environment and those living in these areas. Examples: The military do not abide by environmental regulations, so when they went to remodel old housing full of asbestos and lead paint, the created dust pollution that extended up hill and covered our house. I have since suffered from COPD due to the months long tear down of these houses. #2: On Ft Ord, the military buried waste for decades, including old jeeps, other military equipment, dirty oil and other toxins still being discovered. Plumes of pollution have seeped into the groundwater, and are continuing to cause problems with the safety of water from deep wells on the base. #3: Use of ammunition has polluted vast areas of what are now deemed park, making it hazardous for present use, even though the fort has been abandoned for years. Controlled burns have been required to reduce ordnance hazards, but the fires create their own pollution and hazards. The military owns millions of acres across the country. Please restrict them from all other public lands, including the Olympic Peninsula.¹⁸²

Though I agree with the need for realistic training, encroaching on public park lands up to 30 times per year per the request is outrageous! The current administration is already opening so much of our much cherished national lands, opening even more State lands like this is reprehensible!¹⁸³

I oppose the Navy using Washington State Parks on the Olympic Peninsula, and expansion of plans to use the whole coast. There is a direct conflict between their purpose and the purpose of state parks in Washington, and a full Environmental Impact Study (EIS); broad public notice and engagement; and a full cost and benefit analysis needs to be done before any permitting is pursued. I oppose my tax dollars and fees being used for the Navys' proposed activities.¹⁸⁴

I support the approval of this U.S. Navy request. Thank you.¹⁸⁵

I have lived very near where Navy Seals train in California. Training was conducted on beaches, water, and both rural and urban city areas. They were and are very respectful of the environment, always leaving the area in pristine condition. Most times better than they found it. They have been respectful of residents, both human, animal, and plant life. They are always accompanied by local and/or state park officials who ensure regulations are strictly adhered to. I have the utmost respect for the Navy Seals, their training methods and discipline. Their jobs mean travel around the globe with enormous respect and consideration for all countries customs, culture, and environment leaving a minimal carbon imprint on their surroundings.¹⁸⁶

I am IN FAVOR of expanding the operational parks that the SEALS would like to use for training purposes. I've used these parks myself and they would include some very realistic conditions under

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<p>which SEALS should be allowed to train. They assure us of our freedoms as Americans and we should support them. I honestly don't know anything about the "hand wringer" group that is trying to stop this, but they are NOT part of the solution that we need to keep this country free.¹⁸⁷</p>
<p>I am strongly opposed to having the Navy training in our State Parks. Washington's State Parks should not be used as military training places. The Navy should respect these parks as public places of refuge and respect for nature. Our state parks are visited by millions of residents and tourists and should be protected as havens of natural beauty, not places where a child could come upon a terrifying military exercise. Our parks benefit local communities. If our parks become military training grounds, local businesses will suffer. I spend a lot of time at our state parks, hiking and enjoying the tranquility and also volunteering for environmental organizations. I really don't want to be terrified by a SEAL training or to travel to these parks to find them closed.¹⁸⁸</p>
<p>I understand why the Navy feels training on coastal areas is important but do not feel allowing them to conduct such training in our State parks is a good idea. these parks were created to protect unique & valuable landscapes for public use & education & I feel the Navy's plans seem counter to those purposes. Please reconsider their proposal.¹⁸⁹</p>
<p>No Navy!¹⁹⁰</p>
<p>I've investigated 5 school cancer clusters. ALL were caused by EMR (Electromagnetic Radiation) exposures. I lost a son from GBM Brain Cancer in 2008. Rich was a student on the SDSU (San Diego) campus. There is a cell tower on campus called HPWREN (High Performance Wireless Research & Educational Network). This cell tower is connected via the grid to many different agencies including the NITRD/SPAWARS/ and NASA: https://www.qsl.net/kb9mwr/projects/72mi.txt... Dirty Electricity, power-lines, cell towers, industrial Wifi are all the culprits in these cases. The 2018 NTP (National Toxicology Program) Study was released in its entirety. A 10 year, 30 million \$ study which found ""Clear Evidence of Harm by Wireless Radiation."" There is enough evidence to reclassify anything wireless to a Class 2A carcinogen. This is the same category as benzene or asbestos. We need to quit doing these exercises. We are being engulfed in these ridiculous emissions. This also includes marine animals and other wildlife. We are damaging tree foliage's and plant growth. We already know that these tests do and they need to be stopped. The sooner the better!¹⁹¹</p>
<p>I am totally against using Washington State Parks for military combat training - in any form. The military already has their own land we're not allowed to go on, and now they want to use land we've set aside for our legacy, our heritage and places we can go for our own piece of mind and mental well being. This is NOT in any way a proper activity for state parks. Please vote no on this hairbrained and unacceptable proposal.¹⁹²</p>
<p>I am opposed to Navy training in our National Parks. I opposed Sonic weapons testing in the Olympic Peninsula because of the damage to the environment and I would like to leave natural spaces meant for the use of humans , animals and the web of fragile ecosystems to be left unpolluted. The US military has the highest rates of pollution in the world. Military test sites and bases are the most problematic Superfund sites. With the new EPA rollbacks on water protection, there is nothing legally impeding the Military from polluting our wild spaces. I say No on military exercises, use of weapons or testing of weaponry in the Olympics or any of the US wild protected areas.¹⁹³</p>
<p>do not renew permits for military exercises in our public parks that would be an invasion, in my mind and nonsense if the military needs to exercise itself, let it do that on base if that doesn't work, disarm them and put them outside public spaces and population centers - with permission from a voters referendum¹⁹⁴</p>

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Given the lack of regard the Navy has shown the residents of Whidbey Island, and their history of polluting Puget Sound, I don't think we can trust them to have access to 29 of our parks for their uses. Particularly when this proposal signifies a 580% increase in the number of parks to which they would have access. The Navy has a clear history of disregard for the environment and not playing well with others; giving them access to 29 state parks does not seem like a decision that would be in the best interests of the parks and those of us who enjoy them. I would also be interested in knowing if they have offered to reimburse the State Parks for the damage that is sure to be incurred from their training? The Parks are already underfunded and have a hard time keeping up with maintenance of normal usage; I worry that this additional use would be a step too far and leave trails/ parks unusable for the public.¹⁹⁵

Please do not renew the military permit to access public parks. The parks are for the public not for the military.¹⁹⁶

As I sit writing this letter, I am watching the Navy's growler jets flying low over my house conducting field carrier landing practice at Outlying Landing Field, Coupeville. We live in Admirals Cove which sits directly under the flight path. In our home the noise meter reads at 90+ decibels, and outside the meter reads at 120+ decibels. Our windows rattle. The dog hides, we cannot have a conversation, listen to music, or watch television. It is even too distracting to enjoy reading. Since March 2019, this scenario repeats 3 to 5 days a week for hours each day and often late into the night.. To get away from the thunderous noise, to find some peace and quiet, and to enjoy some time outside, we head to our favorite parks, Fort Ebey and Fort Casey. This is where we can walk our dog, watch the sunset, go for a hike, and stroll the beach. The thought of the Navy intruding in our place of refuge, holding warfare games, and doing surveillance on park attendees, is one more intrusion into our already disrupted lives. To add to the noise assault on our home, the Navy now wants to conduct drone surveillance over Admiralty Inlet. Already we have to go inside and close our doors and windows when the jets are flying to protect our well-being and our hearing. If the surveillance is approved, we will also need to close our shades which will shut off our beautiful view in order to protect our privacy from surveillance cameras. We ask you to please not let the Navy carry on with their plans to take over more parks and public lands and not conduct air surveillance over Admiralty Inlet. Please protect your citizens right to the places they go to recreate and get away from the rigors of everyday life. They pay for their parks with their tax dollars. They have a right to be there and not be subjected to Navy training exercises. The Navy needs to conduct training exercises on their own land. Please protect and save our place of peace, quiet, and refuge from Navy intrusion.¹⁹⁷

Please do not continue to allow the Navy access to our parks for exercises. These are Parks! Public enjoyment, wildlife and nature places. As a person with PTSD it especially gives me pause. The vulnerability of this, even if held off and laid low until I pass- definitely does not feel appropriate to places I go for safety and sanity. I have felt this when I have known of pending exercises in Port Townsend. I think, too of the children. These are areas of our community wellbeing. I would bet the very definition of state parks does not point to military training sites. There are other areas well suited to such things. Indian Island, naval Base at Keyport...Please take this into strong consideration. I spend time in these parks every day.¹⁹⁸

I don't think that it is appropriate to grant the US Navy a permit to train in our state parks. Those sites are for public use, not military use. The military has enough of our prime public land and waterfront already secured. Sites such as Indian island, Subbase Bangor are among already government owned waterfront sites that should be utilized for this training. Using public parks for military training is just plain wrong and sends the wrong message to our public and youth.¹⁹⁹

"There are plenty of other Navy-owned waterfront sites to perform this type of training. Indian Island Ammunition Depot, Submarine Warfare Center Keyport, Subase Bangor, Naval Hospital Bremerton

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<p>shoreline, the Manchester Fuel Depot, and a myriad of other locations. The federal government has significant land holdings everywhere and these can be put to use to keep these activities out of our public parks.²⁰⁰</p>
<p>I am opposed to using our State Parks for these Navy Special Operations Training. These are public spaces for people to enjoy and inserting training personnel would be disruptive, disturbing, environmentally risky, and potentially dangerous.²⁰¹</p>
<p>I do not support the renewal of the permit for the US Navy access to State Parks for training. Please deny the renewal request.²⁰²</p>
<p>I am in favor of allowing Navy SEALs to use WA State parks for their training. Most SEAL training is done at night--unlikely to disturb park users. If the SEALs are spotted day or night, it is pretty much of a failed training exercise--these guys are good, so again, very unlikely that park users would be impacted or startled by their presence. The vocal minority alleges that the expansion would entail "camouflaged troops" hiding in upland vegetation and "spying on park visitors." Really? How can a rational organization/person make a statement like this? There is more danger of ""peeping Tom's"" spying on park visitors than Navy SEALs! The Navy SEALs have been training up here for 10's of years, I would challenge the vocal minority to find any park visitors who have ever seen a SEAL or observed anything indicating they had been there during a training mission. Although I do not have any evidence to support this statement, it is my belief that a large family reunion probably does more damage to the park on any given day than a SEAL training mission. Support these warriors who are guaranteeing our freedoms; allow them to get the best training they can; so they are the best prepared to go to war for US!²⁰³</p>
<p>I say this as a 26.5 year military veteran: Our society is already too militarized. Enough is enough! I say "no" to the use of State Parks for military training.²⁰⁴</p>
<p>I support our Navy Seals and their training!!²⁰⁵</p>
<p>I'm all for it! Let our soldiers train here in our parks! God bless them and God Bless the USA!²⁰⁶</p>
<p>This is a civilian country. And, like it or not, the armed forces are supposed to be subject to civilian judgement and decision making. The armed forces no longer respect the people they should defend in time of war -- instead, the armed forces have contempt for civilians, their institutions, and their preferences. The proof is their assumption that in peacetime and at all times the civilians are sheep to be ordered here and there and that any piece of land or body of water is the rightful property of the armed forces. This assumption is held by too many elected civilians and civilian parks officials who allow the armed forces to dictate to us and to impose their judgement on us. I say NO to the Navy's use of public parks for any purpose whatsoever.²⁰⁷</p>
<p>I am writing to show my support for the NAS Whidbey Island Navy Seal training in our parks and waters. I realize that there is opposition to any military training of any kind but the military training is important on many levels. This island is a part of our community and training operations have been going on a long while here. I came to the island in 1973 and have thoroughly appreciated the Navy's involvement and contributions to the community and the local economy. Much of the opposition we are hearing about are from individuals who flat out don't truly support the military. Please add my name to the column that is showing support for our Military and our Navy training.²⁰⁸</p>
<p>I am writing to express my personal dismay at and strong opposition to plans to conduct SEAL training in Washington State Parks. As a year-round weekly visitor to Washington state parks, I consider them an irreplaceable cornerstone to my mental health and happiness. This is a very personal appeal, I know, but I'm sure I can speak for many who feel the same. What gives the parks such value as a restorative place is that the people who use them are grateful for them in the same way that I am. Please save parks for their original use, recreation. Recreation is not compatible with use for combat training. Period.²⁰⁹</p>

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<p>The state parks are not for military use of any kind. surely the navy can use land already owned by the U.S. government to train.²¹⁰</p>
<p>I support the new application for the Right of Entry permit for Navy Seal Cold Water Training using Washington State parks. The fact that there has never any complaints from the public about disruptions should be cause enough for reissue the permit. Our state parks diverse topography make them idea training sites.²¹¹</p>
<p>I support the navy.²¹²</p>
<p>I fully support the Navy using State Parks as training facilities as long as there is no negative impact to park visitors. Reading through the proposal I feel the activities listed are low impact for the community and high training value for the Navy.²¹³</p>
<p>Navy SOF training in Washington State to include State Parks is an efficient use of resources to conduct this valuable training and should be allowed.²¹⁴</p>
<p>As a resident of Port Ludlow, Jefferson County, I completely support the Navy Seal's proposal to train personnel in any any all of our local state parks.²¹⁵</p>
<p>I am a resident of Kitsap County and live near one of the State Parks currently used by the SEALs for training. I fully support their continued and expanded use of my tax-funded State Parks. I've lived in the area for 16 years and have never seen, heard or known that our service members were using the park. I walk thru the park frequently alone or with my dog and if for 16 years I've never noticed then what possible harm is there in allowing this practice to continue and even expand? I know of none. I'm a taxpayer and I ask you to let them continue to train.²¹⁶</p>
<p>I support any and all Navy training, including but not limited to SEAL training and Growler training. I live on Whidbey Island, and hear jets every day, plus I live very near Deception Pass, which would be a great place to train them. They need to be as well prepared as possible in these days of uncertainty.²¹⁷</p>
<p>I strongly support the use of our state parks for Seal cold water training. These are the people on the front lines all over the world protecting our safety and freedom. The least we can do is let them train in a safe and friendly environment.²¹⁸</p>
<p>Our Navy Seals need to prepare for possible missions in cold water areas. The abundance of areas in Puget Sound are significant value to help our military to train and prepare for protecting our Nation.²¹⁹</p>
<p>I strongly support the Navy Seals using our state parks for training.²²⁰</p>
<p>Support this training 100%, these are necessary and perishable skill sets that must be regularly practiced.²²¹</p>
<p>I live adjacent to Illahee State Park and have no problem with it being used for Navy SOF training. Their presence will have no impact on the park or the surrounding area.²²²</p>
<p>I wholeheartedly support the Navy and the expansion of its training to include more of our park system. You have my support and encouragement!!!²²³</p>
<p>I strongly support the use of parks and other facilities for training by the Navy Special Forces. Our local area supports many Special Forces personnel who will benefit from this minimally invasive training. The public and the environment are not placed at risk and our front-line military personnel will benefit from the training. I do not see the down side to this.²²⁴</p>
<p>Please allow Navy SEALs permits to train at State Parks so that they can be well prepared to survive when they are deployed.²²⁵</p>
<p>No Navy Seals in State parks! They have vast tracts of land in which to practice their war games. Whether we see them or not is irrelevant. They are using public land for military activity. That is totally inappropriate and a dangerous creep toward a militarized presence in our daily lives. Our parks are for people. They should be peaceful, natural places. If we should be attacked tomorrow by the Russians I would still feel the same way.²²⁶</p>

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I strongly oppose the use of public parks for any form of military training. I was shocked to learn that this was happening without our knowledge. It's dangerous to the public who use these parks. I cannot imagine that it is a use that fits the mission of State Parks. Please reject all requests and withdraw any existing permissions.²²⁷

I support use of our state parks for this particular military training. I am a pacifist. I think there are better ways to solve problems than military action. But as long as we have a military, we cannot send our neighbors and our neighbor's children to fight for us without ensuring that they can complete what they are tasked to do and come home whole to our communities.²²⁸

The Parks are a places of sanctuary, sacred for enjoying the PEACE they offer the public. There are so many other sparsely populated areas for alternatives in our state which are much better choices! Also, there are many alternative, low populated states i.e. Montana, Wyoming, Idaho, Utah, Kansas. States possessing land already damaged from mining and/or military mismanagement which are readily available for military use! Your actions are unacceptable! This action deciding deleterious abuse to Washingtonians has irreparable consequences! You may not do so without OBEYING THE ALREADY KNOW OBJECTIONS voiced by Washington State residents and dismissing our the stewardship is abhorrent. These Parks are OUR lands! These PARKS belong to ALL Washingtonians, NOT THE FEDERAL GOVERNMENT. YOU ARE NOT ENTITLED TO DECIDE THIS CRITICAL ISSUE OF IRREPARABLE CONSEQUENCES, WITHOUT OUR VOICES! OUR PARKS ARE NOT TO BE USED AS DISPOSABLE TRASH HEAPS, as you are now relegating Washingtonian's citizens, tax payers to become. We don't want war, don't promote it and DON'T NEED IT! This seems to be just another rape of our nation, our citizens and our right to make decisions! HERE IS THE FIGHT! You have made this meeting so out of the way, in a remote area, most cannot participate in person, FACE TO FACE, in order to combat this travesty! Another power grab to steal what is rightfully ours! How about the wildlife? The children who would never know about nature? People depend on our Parks to ELIMINATE THE NOISE in our daily lives. HOW ABOUT THE MAJORITY, THE PEOPLE WHO NEED POSITIVE, NOT NEGATIVE RIGHT NOW AS OUR NATION IS ALREADY IN AN INTERNAL WAR? A war ongoing on inside our NATION RIGHT NOW. Who speaks for the people of Washington? NOT YOU! The military machine? NO! Washingtonians OVERWHELMINGLY oppose this. You have refused to listen to those who actually care, who live here, who will be harmed by this. These lands are not yours to give away, do not belong to the MILITARY. You may not do so in such an irresponsible way. Those of us who OWN THESE LANDS have the right to keep them, THAT IS WHY THEY ARE THERE IN THE FIRST PLACE! Who do you work for, the money machines? Hate mongers? WE OPPOSE THIS THEFT! THIS DEBAUCHERY! This TREACHERY! How dare you, another behemoth agency grafting, conning, disintegrating, dismissing the needs and requirements of the people! WE OPPOSE THIS! WE DON'T NEED THIS! WE DON'T WANT THIS! Â Lastly, war is not the answer! The majesty of these parks allow us to foster happiness, integrity, intelligence, stewardship, community, and foster growth in a much healthier, a more sustainable way! WASHINGTONIANS OPPOSE THIS.Â We demand you move the meeting to Tacoma, Seattle ~ somewhere we can participate. What a dishonest action to hold it in the middle of nowhere! Stop this dishonesty from A to Z! WHERE IS YOUR INTEGRITY? WHERE IS YOUR PATRIOTISM FOR THE STATE? THE MAJORITY OF US, THE NON MILITARY COMPLEX ORIENTED? This benefits none of us. For those of us who must have the calmness and beauty to live, where is your representation for us? These actions will personally harm me!²²⁹

As a property owner on the waterfront, with 220 feet of beach access, I fully support training of our navy men and women in state park lands and other waterways of our state. The fact that this is even an area of contention is ridiculous.²³⁰

I fully support the Navy's request to use our coastline, including state parks, to conduct training. National Defense is or should be important to all of us. The Navy needs to conduct training and their use of state property costs us nothing. Additionally, the Navy has been very proactive in protecting our

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<p>waters and our shores, probably much more than the average citizen. Please let the Navy use our Parks.²³¹</p>
<p>I completely support using local, state and federal parks in and around Port Townsend, WA for Navy SEAL training. It is an appropriate use of our valuable resources, both human and natural.²³²</p>
<p>I wish to extend my support to the Navy Seal training application for renewal and expansion of the state parks/lands at which they can continue to train. this is a matter of national security and we should be giving them the maximum support possible to be sure they get the best training possible to complete their missions.²³³</p>
<p>I am writing in support of the Navy's application to conduct SEAL training exercises at Washington State Parks. I am a homeowner on the Bremerton waterfront and frequently observe SEAL Delivery Vehicle training in the Port Washington Narrows. These operations are performed safely and without interference to normal maritime operations and recreation. I have every reason to expect that the Navy will be equally respectful of the State Parks and the patrons there. The application seeks sites for achieving essential special forces training without which US personnel would be subject to exposure, operational failure, and lethal counter attack. This request and the training sought serves our national interest and represents a component of our counter-terrorism offensive. I ask the Park Commission to give its highest endorsement to the Navy's application²³⁴</p>
<p>I strongly support this Navy proposal. This training has been going on for decades with no adverse impacts and it is critical for the special ops folks to have this type of cold water experiences. We should all be supporting this type of training for our heroic sailors.²³⁵</p>
<p>My wife [REDACTED] and I very much support the training of our US Navy Seals on our state beaches and in our parks and waters. Their training is important to military preparedness and national security sustainability. Navy Seal impacts on the beaches, parks and waters should be minimal if indeed they are detectable at all.²³⁶</p>
<p>I am against the Navy having access to Cama Beach State Park for training purposes. My husband and I had the privilege of hosting our wedding there last August. We wanted to showcase the Pacific Northwest and felt that Cama was a perfect location. I would have been extremely upset to have these Navy training events occurring throughout the weekend in an otherwise serene location. Many people have already reserved the cabins at Cama for weddings and family reunions since the cabins book out 18 months in advance. I can't imagine after all the work of reserving the cabins (we called for 6 weeks before we got them) finding out that a training event could occur during the same weekend as my wedding. It would be incredibly disruptive and could dissuade people from renting the cabins in the future. Please keep Cama and our other State Parks peaceful! Please vote against allowed expanded access to the Navy.²³⁷</p>
<p>As a heavy park user, for both trailer camping and marine park boat moorage, I fully support allowing the Navy to access more parks for training. In addition to spreading out the training schedule, it also increases the number of opportunities for our residents to engage with the Navy's liasons and learn more about our volunteer defense forces. I see very little downside.²³⁸</p>
<p>Anything we can do to support our military is worth it. I can't imagine what permanent damage the Seals training would do to any ecosystem in the parks they wish to use. If opponents would notice, these are tidal lands and extremely dynamic. If the fishermen who take clams and such don't leave damage behind, neither will the Seals. Seals won't be depleting resources. Let them train.²³⁹</p>
<p>I support the Navy's use of any and all federal and state owned properties and beaches for the use of training it's personnel.²⁴⁰</p>
<p>I absolutely support the shared use of our parks for the training of Naval Special Warfare Soldiers. Thanks to them we are able to enjoy our parks!²⁴¹</p>

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<p>As frequent RVers, our kneejerk reaction to this practice is No! Leave your State Parks alone, in keeping with their purpose! In light of the barbaric SEAL practices recently exposed, and worse yet, the Commander-in-chief's encouragement of same, we would be frightened to even visit these areas if training were expanded further!²⁴²</p>
<p>I see know problem with this program. The Seals need every advantage they can get. This training environment gives them that. Leave no trace is a great bonus.²⁴³</p>
<p>I am for the Seals expanding their program. This assists us in greater preparedness and readiness against attack and to assist other friendly countries in their struggle for freedom and from oppression.²⁴⁴</p>
<p>Clearly the missions of the military and the parks system are at total odds with each other. The military needs to find somewhere else to play war games.²⁴⁵</p>
<p>Let the Navy Seals train. Need to keep our military sharp.²⁴⁶</p>
<p>They Navy needs to train our men and women for the job of protecting this country. They can only do this by training in the environment that they will need to perform their duties, otherwise we risk our best and brightest as they will be unprepared. I am pretty sure that the groups that are objecting to the Navy's use of our parks, will be the first ones screaming for their help when needed. This is low impact on our parks as evidenced by their objective to "leave no trace". We must support our military and not let those that do not support our military dictate reasonable public policy.²⁴⁷</p>
<p>This is getting worse and worse. The once quiet space around Sequim Bay is NOW wrecked with the ear piercing sound of jets going by! Almost every day. As I write this more just went by! Noise Pollution at its highest. This needs to stop. People moved here to get away from this... now you want to Expand this Pollution? Heartbreaking for people, pets & wildlife.²⁴⁸</p>
<p>Our brave warriors need to and deserve to train in a safe environment to improve their skills, increase the likelihood of mission success and return from those missions unharmed. Citizens concerned about being observed without consent or knowledge should be reminded they're in a public place and the observation is no more intrusive than the thousands of cameras that capture our image and movements while going about our daily lives.²⁴⁹</p>
<p>The State of Washington should support the Navy request to train in any State Park or National Park. This type of training is absolutely essential to ensuring that the men and women that protect us are properly trained and ready. Support our troops and allow the Navy to provide the requested training in our State.²⁵⁰</p>
<p>We support the Navy's proposal to continue to conduct training exercises in Washington State Parks. The Navy is very reasonable about its training policies and scheduling. We have never been negatively impacted in the past and do not expect any new problems. State Parks should be very proud of its role and support for the Navy and keeping America safe. We sure are.²⁵¹</p>
<p>I am in support for the Navy Seals to use Washington State Parks for their vital training. From what I have read there seems to me minimal impact on the environment. My background includes:</p> <ul style="list-style-type: none">• Masters in Environmental Engineering• Bachelor degree in Civil Engineering• Washington State Professional Engineer• Over 8 years reviewing and correcting storm water documents, and erosion control plans• About 2 years erosion control field inspection• Over 18 years of working in heavy construction <p>The Parks goals and the Navy goals are in agreement on the environment and, "recreational disruption". Both want as little disturbance as possible. While it is true there is potential for, "incidental private observation" I don't believe there have been any complaints of such from park visitors in the past 30 years. Also, I believe the low frequency of training spread out at the five parks in</p>

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<p>question would keep odds low of any incidents. Washington State Parks could also inform potential visitors of possible SEALs training at these five parks allowing visitors the option of going to another park. The low possibility of incidental recreational inconvenience experienced by park visitors is far outweighed by the benefits of this critical SEAL training.²⁵²</p>
<p>Please allow the navy seals to train at any and all state parks that they desire. They brave Americans deserve our support in very way. I whole heartedly support this use of our state parks.²⁵³</p>
<p>Completely in favor of all of our armed forces using any public parks or lands for training. These lands belong to all of the citizens and the armed forces protect all of the citizens. Should not even be a question.²⁵⁴</p>
<p>100% support NSW training on the Olympic Peninsula, and humbled and grateful to know that honored patriots like Monsoor, Murphy, Brown, Christianson, Dietz, Axelman, Job, Lee, Beyers, Slabinski, O'Neill, and so many more have used our local waters to perfect their fieldcraft to defend our nation.²⁵⁵</p>
<p>Please do not slow military training in our local parks. Parks are a place of peace, serenity, where people go to reconnect with nature and themselves. It's not for our military to practice in. It is for our people to recreate on.²⁵⁶</p>
<p>Please don't do this. there are so many places to train the seals it is unnecessary to ruin beautiful, natural land.²⁵⁷</p>
<p>I support the SEALs using the parks for their training. My son and his friends do much more damage then these trained professionals do.²⁵⁸</p>
<p>Landing military bruts in their full invasion gear on the beaches of the Washington State parks is a terrible idea. It will only frighten folks trying to have a peaceful picnic to see all these jackboots coming for them.²⁵⁹</p>
<p>I strongly oppose the use of Washington State Parks to train Navy Seals. These lands and beaches are set aside for preservation and for recreational use by not only Washington State, but for national and global visitors. As a resident of Washington, my tax dollars help support the mission of State Parks. As a neighbor to one of the Parks that may potentially be a training site for military training, I feel that this proposal is a violation of privacy and safety for Park visitors and neighbors. I believe military operations and clandestine exercises impacting unsuspecting civilians is contrary to the Washington State Parks' rules, goals and mission.</p>
<p>The Navy and other military branches have access to thousands of acres of land and shorelines for this type of training. They should not have access to the public recreational lands of Washington State.²⁶⁰</p>
<p>Militarization of any park...county or state or national...is an obscene use of this public land. I depend on you to refuse militarization of any of our State Parks by not allowing military training operations in parks.²⁶¹</p>
<p>Should the State Parks approve this proposal from the Navy, it will be nothing short of a betrayal of the public trust. The park and its beaches are for the benefit of natural systems, the creatures who live in these systems, the people who enjoy the peace and proximity to this park and this earth. Or, if you prefer, the park is civilian space, set aside as such so that citizens may enjoy it in peace and not with the prospect the militarization of the park. The Navy already proposed this just two short years ago and received only negative feedback. After considerable push back from the public, it was decided that Fort Worden, at least, was not to be used by the Navy for its training. The boundary between the civilian and the military must be absolute. The National Park system has already capitulated on this principle for the benefit of the growler jets that currently make the evening sky sound like thunder from Valhalla where the gods fight. So, for God's sake, don't approve this. I and my neighbors will attend the Fort</p>

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<p>Worden meeting where you will have the opportunity of looking us in the eye as we make our objections.²⁶²</p>
<p>Bad idea. The Navy has plenty of their own real estate to train on. The Navy can visit the parks when they are off duty.²⁶³</p>
<p>Our beautiful Washington state parks are NOT the place for military exercises! Our state parks were established for the protection of nature and wildlife and for the peaceful enjoyment of their human visitors. We have fewer and fewer places where we can go for peace and quiet, and wildlife habitat is shrinking more and more every day. Our State parks provide such a place for wildlife to thrive and for visitors to relax, reflect and rejuvenate. Military exercises in our parks are completely counter to the purpose of our state parks. These war exercises will disturb wildlife, and destroy the natural ambience and peace for everyone who visits these beautiful, protected spaces. MILITARY WAR GAMES, EXERCISES, AND THE NAVY are NOT WELCOME in our Washington State Parks!!!! Use your military bases for practice and exercises - that's what they are there for!²⁶⁴</p>
<p>I fully support allowing the Navy to use our state parks for training. The training they do is critical to the success of their mission to protect us and our nation. The Navy has been doing training in our area for years without incident. It is apparent from the large amounts of information that the Navy has provided that they have no intention of impacting other park users ability to enjoy our parks. As Americans and Washingtonians we should be thanking our armed services for their sacrifices and providing them what they need to properly train for success and to minimize risk to our Soldiers and Sailors while on mission. This request has minimal to no impact and should be approved.²⁶⁵</p>
<p>Please allow the Navy to use our state parks for training. The Navy has been doing training in our area for years without impacting other park users ability to enjoy our parks and should be allowed to continue and expand locations as requested. This request has minimal to no impact and should be approved.²⁶⁶</p>
<p>I support the Seals training in the National Parks.²⁶⁷</p>
<p>Navy SEAL training in the environment offered by the Pacific NW is exactly the essential, cost effective, real life training required by our Navy's Special Forces today. Their mission is covert, avoid detection at all cost. The public will never know they were there. The group, WEAN, has decades of history opposing everything relating to Navy operations and training, for whatever reason. Let the training continue!!²⁶⁸</p>
<p>I am completely opposed to the use of our state parks for any military training. This is not a good use of our parks. Public open space and shore are already in short supply, and many more people are moving to the region, increasing the use of the parks. I already have to hear very loud jet noise from NAS Whidbey most times I go to the shore, I don't want to run in to armed personnel on a training mission too. It really is a violation, not only of the public's chance to have a peaceful experience on their day off, but also of all the endangered and threatened animals and plants that are there. The military has gotten along well all of these years without training in the state parks, I believe they can continue to be the world's foremost military without doing this. Is it possible that a reason for this plan and also the recent proposal for greatly expanded Growler flights over our communities is an expression of hostility and retaliation towards the community for questioning the need for Growler flights at the existing level?²⁶⁹</p>
<p>Let the SEALs train on Whidbey!!!!²⁷⁰</p>
<p>I am so proud that the Navy would want to train its special ops teams in our parks, many of which we have only because of the military anyway. I know they have been doing this for quite a while and would love to see them in action. This enhances our parks and the experience of park users. An all around great idea, and one that will help keep our men and women in uniform safe while they risk their lives for all of us.²⁷¹</p>

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Please do not renew the Navy's ability to practice in parks. These are places dedicated to recreation in the most fundamental meaning of re-creating peace and well-being.²⁷²

Please support the training of our Navy Seals. They will not harm our beautiful parks.²⁷³

I support this US Navy proposal to use more public parks for training. This training is essential for troops to continue to defend our country. They conduct an environmental assessment. The use of various state parks for training exposing the Navy to different shore conditions, tides, terrain, and topography/bathymetric locations. Please allow the Navy's proposal to proceed.²⁷⁴

I strongly urge you to grant the Navy access to Washington State Parks to continue its SEAL training! By virtue of the nature of the training, the SEALS would not even be seen or noticed. The few people who oppose this are the same few who are trying to force the Navy to stop Growlers from practicing carrier landings at the Outlying Field in Coupeville.²⁷⁵

Thank you for this opportunity to comment on the Navy's application to expand their use of Washington State public parks. I live in the Anacortes area, and am an avid kayaker and hiker, so am familiar with many of the parks proposed for the Navy's application, and have some concerns that I would like added to the official record on this proposal.

1. Size and scope: I have concerns not only about the sheer increase in the number of parks that are included in this proposal (from 5 to 29) but also in the potential and loosely defined amount of use they might subject to. The application surmises that any (or all) could be used for training 2 to 72 hours per training, 3 to 36 times a year, for up to 84 trainees at a time. How can impacts to the public, the natural environment and wildlife be accurately assessed with such wide possibilities and potential huge increases in use by the Navy?

2. Conflicts of purpose: One of the reasons for going to a park is to ""get away"" from the ugliness and burdens of our lives and be refreshed by natural plants, animals, scenery and solitude. Even though the goal of the training is for the trainees to be ""undetected"", it is inevitable that people (and wildlife) seeking solitude will have encounters with these personnel and their replica weapons. I have particular concerns with Deception Pass State Park that is used year round-with very heavy use in the summer months of these sorts of conflicts occurring. I think that these uses are not compatible with each other.

3. Mitigation of impacts: The proposal(s) list training and support activities such as insertion/extraction training, which includes the use of submersible and surface water craft, ROV's and may occur day or night. Other training would involve beach and trail crossing into ""staged"" areas and surveillance activities. I have concerns that the stray lights, noises, and activities (especially when performed at night) could potentially cause impacts to nesting, roosting, feeding, resting, navigation and sheltering of birds, fish and other animals that use these same areas. Humans can typically go home if their vacation is ruined by a nighttime invasion of Navy trainees. The wildlife cannot. Nowhere in the 262 page document did I read how or if these sites would be monitored for potential negative impact to wildlife and their habitats as a result of training exercises and all of the support equipment and personnel used to carry them out. How will potential damage be mitigated or ceased if there is no independent monitoring of impacts?

In summary, I understand the need for the Navy to have a mix of different training areas for their recruits. However, I believe that this proposal is asking for too many sites with too few restrictions on when and how often they might use them. I believe the application should be honed down in both the number of sites requested, and in the amount of use requested. Independent monitoring and reporting of impacts should be required of each site-and a ""pull the plug"" clause that requires parks that are suffering damage or show a pattern of human or animal encounters with Navy personnel be removed from the property agreement.²⁷⁶

The Pacific NW has the essential, environment for the Navy Seal Training. They have been using this area for training for over 30 years! It is cost effective, real life training required by our Navy's Special

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<p>Forces today. They practice to avoid detection at all cost. The public has never known they were there when training these pass 30 years. They have not destroy or harm the environment, or anyone in the public! We need these special forces for our protection in future crisis or to rescue people. Allow them to continue training. The group, WEAN, has decades of history opposing everything relating to Navy operations and training, for whatever reason. Let the training continue!!²⁷⁷</p>
<p>I believe that the Navy SEALs should be allowed to train in Washington State parks as they already do. Seldom observed, never endangering and leaving no trace. It is too bad that State Parks visitors can't be so neat, orderly or nonpolluting.²⁷⁸</p>
<p>Our Special Forces personnel put their lives on the line for us every day, and if we can contribute to their preparedness by sharing use of the Washington State Parks, we are 100% in favor of doing so. We don't mind whatever inconvenience that may entail; it gives us a way to feel we are contributing to our nation's security by more than just paying our taxes.²⁷⁹</p>
<p>I think that Navy SEALs should be given all opportunities to train in public parks.²⁸⁰</p>
<p>I support the Navy Seals training in Washington State Parks. I've lived in Port Orchard, Washington since 1988 following my Navy career - and I have no intention of living anyplace else. Our active duty forces need to train - and given the challenges with obtaining training sites outside the United States, local support is very much needed. I am confident that State leaders are very capable to work with Navy leaders so as to have minimal impact on the environment and users. Supporting our troops is more than just a slogan. It takes inspired patriots to take action on requests such as this.²⁸¹</p>
<p>This comment is submitted in support of approving the US Navy's request for expanded Seal Team training in WA State Parks. The training of Navy Seals in a wide variety of seascape and terrains is a valuable part of building Seal Team readiness. Seals have been training in other WA State Parks for about 30 years with minimal to zero impact or incidents. To my knowledge that have not been any complaints from park users other than individuals associated with special interests opposed to the Navy's presence in the Pacific Northwest. The Seals objective is to operate unseen and without a trace both in training and actual operations. Interveners who object to expanding the Navy's Seal Team operations should be required to demonstrate actual harm caused by past operations.²⁸²</p>
<p>I support Navy Seal training in Washington State Parks. I have lived in Port Orchard, Washington for 70 years, and have seen the Navy presence as a positive tool to protect the freedoms we enjoy. Our active duty forces must train to be effective - and given the challenges with obtaining training sites outside the United States, our local support just makes patriotic sense to help produce the finest. I am confident that State leaders are more than capable to work with Navy leaders so as to have minimal impact on the environment and users. Supporting our troops is more than just a slogan. It takes inspired patriots to take action on requests such as this.²⁸³</p>
<p>I support the US Navy's continued training on WA parks for their SEAL teams. Please approve their application that is being reviewed by your department.²⁸⁴</p>
<p>I certainly do support allowing the U.S. Navy and the SEAL teams to renew and expand their training at parks around Puget Sound. They have been training in the Pacific Northwest for 30 years. No one, at any time, has been traumatized by their presence. 30 years! That is quite a record. I hope the Commission sees beyond the protester's attempts at promoting hysterics. As has happened in history, the louder one proclaims, the more often proclaimed, the more others think something is true even though it is not!²⁸⁵</p>
<p>We most strongly support the use of our parks for Navy Training of SEAL's and other military groups as necessary. Nothing would make us feel better about supporting our parks with out of pocket contributions than the fact that they are also used for training our military. If you were to deny them the use of our parks, we might never contribute to the parks system in WA State ever again.²⁸⁶</p>

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<p>I feel outrage at this proposal. My homeland, one of the most beautiful places in the world, is being invaded and occupied by a HOSTILE MILITARY FORCE! The Navy's belligerent attitude toward citizen criticism of their plans is another sign of an ongoing culture war between civil and martial societies. Ridiculous. They are supposed to WORK FOR US.²⁸⁷</p>
<p>Please do not let them do this. Our parks were meant for people to gather and enjoy. I am sure they can find other places to train. This is not what the parks were made for. Please I beg you, don't let this happen.²⁸⁸</p>
<p>I support the Navy using our parks! Please continue to make America safe by giving them a place to train! Support our Men and Women of the military!²⁸⁹</p>
<p>I support the Navy Seals being allowed to train in Puget Sound Waters using our Parks for their access points. As citizens we need to support our Military and aid them in their training. They are not going to bother anyone that is using the park. It sounds like they want to be as invisible as possible. This is just people who hate the Military complaining about the use of the Parks.²⁹⁰</p>
<p>Naval Special Warfare (NSW) training in the Pacific Northwest (PNW) is essential to our Nations commitment to Support and Defend the Constitution of the United States of America. Any American who opposes the lawful conduct of military training in the PNW, does not support those who volunteer to support and defend the Constitution of the United States of America. This is a one team one fight issue, all Americans citizens are responsible for the preservation of the Union by supporting our military forces. NSW should be allowed to conduct any and all military training in the PNW that improves their operational capabilities.²⁹¹</p>
<p>Our State parks are a valued asset as they are citizen-owned parks not military training lands.²⁹²</p>
<p>I support the Navy training in Washington's state parks. We need our services well trained.²⁹³</p>
<p>I support allowing the Navy to train in our state parks as they requested. I want our servicemembers to be properly trained.²⁹⁴</p>
<p>The Navy has not shown any indication they are willing to consider or try to mitigate any of the horrible impacts on the public their growler flights are causing. I see no reason to believe they would become more conscious of public impacts if they were allowed to use our state parks. Therefore, I vote NO on allowing the Navy to use our state parks for training.²⁹⁵</p>
<p>I am NOT in favor of the military using Camano Island or Cama Beach for their training activities. The Navy is doing enough damage with their excessive flying operations already. To say that their water/on land operations will not do any harm is ludicrous.²⁹⁶</p>
<p>I write to support the Navy's request to continue training in the Northwest, specifically in its parks. This is extremely valuable training which is done by one of our most critical units, the Navy SEALS. They have conducted this training for decades without negative effects on people or environment. As the former Admiral in command of the Navy Region in the Puget Sound, I can attest to the great respect the Navy has for the outstanding support we've received from the people there, and to the excellent facilities and training we enjoy. The Navy is truly a good neighbor in Washington, while carrying out critical training. Please allow the Navy to continue this worthwhile training in order to continue to protect our country.²⁹⁷</p>
<p>The proposal for Navy training in our Washington State Parks is truly appalling. The State Parks are supported by the taxes paid by WA State citizens. The park's use for military training is potentially unsafe for the general population, and downright disturbing. I'm quite sure that the Navy has their own properties to use for training, and citizens are not allowed on these properties. Why on earth should they be allowed to intrude into our parks?²⁹⁸</p>
<p>I strongly urge the Parks and Recreation Commission to NOT RENEW the permit issued to the US Navy to access any of Washington's state parks. There is no need to even go through the motions of an environmental impact study. State Park's mission - ""...to connect all Washingtonians to their diverse</p>

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<p>natural and cultural heritage and provide memorable recreational and educational experiences that enhance their lives." - is completely at odds with any military training activity within the parks. Whether a park visitor encounters any military personnel or not is irrelevant! The mission of Parks completely rules out even the consideration of allowing such activities. It boggles my mind to learn that the commission allowed these activities within certain parks in 2015. Civilian control of the military is a fundamental principle of American democracy. Do not turn your backs on that critical balance of power - keep Navy Seals (or any military operations) out of WA state parks!²⁹⁹</p>
<p>I wholeheartedly support Navy SEAL training on Washington State Parks lands and waters. It is an interesting thing to see, builds communication and understanding and contributes to military preparedness, and national security and defense. People love to see it!³⁰⁰</p>
<p>OPPOSED. Please DO NOT allow this expansion to occur. More closures can affect tourism to the area. The Navy already has a plethora of options, including parks and bases. Keep those. Travel to others already permitted if need be. State beaches are for public use. This is not a public use and impedes on state residents rights.³⁰¹</p>
<p>I'm a board member of Cama Beach Foundation but I am NOT speaking on behalf of CBF. The following is my personal view. I am OPPOSED to allowing the proposed Navy training because campers, wedding parties, crabbers, boaters, and day users have paid to enjoy Cama Beach SP, Camano Island SP, and the other 27 parks as traditional parks. The only circumstance where the proposed training should be considered at all is if the Navy RENTS THE ENTIRE PARK AND THE PARK IS CLOSED TO DAY USE. If having campers, crabbers, brides, grooms, wedding guests, boaters, day users is an important component of the training, then the Navy should hire actors. I'm familiar with the State Parks' Mission, Vision, and Core Values. Part of your mission is to "provide memorable recreational and educational experiences that enhance their lives." Your vision is "Washington's state parks will be cherished destinations with natural, cultural, recreational, artistic, and interpretive experiences." One of your five core values is "Dedication to outdoor recreation and public enjoyment that welcomes all our citizens to their public parks." Having up to 84 naval special operations trainees and support personnel involved with training activities such as: Insertion/Extraction (with submersible craft, unmanned underwater vehicles, remotely operated vehicles, jet skis, small boats), Over The Beach movement, Surveillance (of park guests?) and Reconnaissance IS NOT CONSISTENT WITH PARKS' MISSION or VISION. Training cycles are January - May and June - November. This is also known as EVERY MONTH except December. Training events might last 72 hours as many as 36 times a year. The Navy might use the parks up to 108 DAYS EACH YEAR. I don't think this use should be permitted because it is NOT CONSISTENT WITH STATE PARKS' MISSION AND VISION. If you do allow this proposed activity, it should only be if the Navy has rented the entire Park and all day use is closed to the public.³⁰²</p>
<p>I strongly disagree with making public recreation facilities available to the US Navy for training. The Navy has an abundance of properties in the Puget Sound region where they could practice. I have purchased a Discover Pass every year since they were first issued, and may discontinue visiting Washington State Parks if this Navy is allowed to use park properties.³⁰³</p>
<p>I support the Navy special forces training at all WA State Parks. Important for national security to have realistic and varied training. USA training must be superior to our greatest foes in the world. Semper fidelis.³⁰⁴</p>
<p>I fully support the continued use of state parks for USN Special Operations Training.³⁰⁵</p>
<p>Please don't allow Special Forces Training in our State Parks. Especially now, parks like Fort Worden are treasured places where community members can go to regain a sense of peace and calm, to be in nature and feel safe. It is not unusual to see otters, seals, even a fox, as well as many birds in the trees, sea and sky. Fort Worden is a place where families and singles like to hike through the woods, explore</p>

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<p>the beach and walk their dog (on leash!), admiring the beauty of Puget Sound. Please let it be a natural sanctuary, not a Navy training ground.³⁰⁶</p>
<p>We--residents of the Stavis Bay area of Seabeck--strongly support the Navy's request to use our public property for training exercises. This is an absolutely appropriate, and important, use of our shared lands. Please approve the request expeditiously.³⁰⁷</p>
<p>Skagit Island is a very small island accessible by boat only. Along with Hope and Kiket Islands they form Kiket Bay which is like being in the San Juan's but without requiring a ferry. All three are part of Deception Pass State Park. Skagit is used year round by kayakers and heavily during the summer months. While there is just one official camp site, at times the east side of the island has multiple users. Pleasure boaters also anchor around the island for shelter and to enjoy the beauty of the area. There is absolutely no place on or around this beautiful little island for the Navy to use as a training ground. If the Navy has it's way, we will become ""Island / Skagit"" naval air base. We must keep our state parks for the recreational use of the people, not a Navy training ground!³⁰⁸</p>
<p>Please do not allow our shorelines & parks to become militarized. Veterans have asked for quiet places to help in coping with PTSD & TBI, the Olympic Peninsula & State Park were sites they liked! Their needs should be respected. Orcas, marine mammals, humans and our environment need PEACE, quiet and healthy places to visit. We DO NOT need to become more militarized! Please DON'T allow this!³⁰⁹</p>
<p>Use Indian Island or Whidbey Island NAS to train. Leave the parks to us civilians. You don't allow us on Navy property and now you want to invade ours. It's not fair.³¹⁰</p>
<p>The Navy Seals risk their lives on a recurring basis to protect our country. We must provide them the training they need to be successful. Washington has many of the required areas for such training and we should allow them complete access to them under the provisions that it has minimal ecological and financial impact to the area. Frankly, I am not concerned about me personally being inconvenienced because the Navy is in my way for a few days at a particular location. I can go somewhere else - we have lots of choices. Please allow this request.³¹¹</p>
<p>Please do not permit the Navy to use our parks.³¹²</p>
<p>I support the Navy renewal application for use of several State Parks for special forces training. As the Washington State Parks itself has noted on its website, there have been no known problems or significant conflicts over the years this training has been conducted. The current application does not propose anything new that is likely to change this positive situation. Therefore, I urge the Parks Commission to approve the new permit in as timely manner as possible. The Navy has a demonstrated track record of acting in a responsible manner while doing its training mission.³¹³</p>
<p>I oppose allowing Navy Seals to do their training in Washington State parks. The Navy owns plenty of property, and can enter into arrangements with private landowners if it wants to train outside of its own facilities. Our state parks should preserve historic and cultural sites, protect natural resources within their boundaries, and provide natural, cultural and recreational opportunities for Washington residents and visitors. They should not be locations for military exercises. Thanks for considering my views.³¹⁴</p>
<p>I strongly object to the Navy using our beautiful State Parks for Naval Training!! They are currently using 5 parks & now want to have access to 29 !! I live on Marrowstone Island & am disrupted by Navy Growlers doing "" touch & goes"" on Whidbey Island. We also hear them going up past Olympic National Park to several sites in Olympic National Forest, disturbing all wildlife & citizens who want some quiet time in Nature. And I know they use Indian Island, next to Marrowstone, for Navy Seal training! Naval submarines often stop the Hood Canal Bridge. I feel like I live on a Navy Base already! This is too much! Just because we have the rich natural lands here does not mean that the Navy has the right to trespass!!!! STOP IT! Try Oregon for awhile! When I lived there, there were no military bases & it was all natural. I feel like the Navy keeps bullying it's way into Mother Nature. Please respect</p>

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<p>it. No more State Parks may be used disrespectfully by the Navy. You already have enough training sites on your existing Bases!³¹⁵</p>
<p>On behalf of all life and the environment that sustains and rewards us, I would like to express my sincere gratitude for your recent decision declining to extend the Navy's permit to perform military operations on the Olympic Peninsula and other affected communities. The last decades of research on the environment prove that human activity can be so detrimental to the earth and other creatures. We regard the environment and these creatures as insignificant at our peril. This Navy extension is an unnecessary encroachment on all life in this region. Thank you and I hope you continue to support the planet and its people by denying the Navy's permanent application for this activity which definitely impedes relaxation and enjoyment at our state parks. Thank you, and thanks in advance for your continued protection of our parks for the benefit of all citizens of Washington.³¹⁶</p>
<p>Thank you so much for keeping Washington Parks for the Washington public! I am sure it was a difficult decision to process.³¹⁷</p>
<p>Thank you for not having naval training in our parks.³¹⁸</p>
<p>Thank you for denying the Navy's proposal to use our parks for SEAL training exercises. The Navy has numerous facilities worldwide that could be used for this purpose and which would not make our parks inhospitable to residents of WA.³¹⁹</p>
<p>Thank you for your recent decision to not extend the permit for navy training exercises in our parks!³²⁰</p>
<p>Our parks should be peaceful for us to use! Thanks for declining to allow Navy SEALs to use our parks for training. Please continue to reserve our parks for the use for which they were created. The military already has a huge amount of land fenced off for their use!³²¹</p>
<p>Please allow the DoD, Navy and whoever defends our public spaces to use them for training.³²²</p>
<p>You made a bad decision the NAVY isn't doing any damage to the state parks shame on you guys the regular tourist are the ones that do more damage. I can't believe our state parks denied the US NAVY from using the parks to protect our county the a United States of America they need all the training they can get to better protect all of us. Without the NAVY Whidbey island would be just a Island they bring a lot of money to all the towns on the island and local Economy.³²³</p>
<p>Thank you for not allowing military training in our WA State Parks. This is very appreciated.³²⁴</p>
<p>Thank you! We must continue to keep the Navy from training in our parks.³²⁵</p>
<p>Absolutely not! We will not give up one of the only public docks and beaches on our peaceful island for this nonsense. There are plenty of similar beaches in the area that are not State Parks. So much damage would be caused by this level of activity it is unfathomable.³²⁶</p>
<p>Regarding the Navy's request to use our State Parks for training: My wife and I are staunchly opposed to this use of our parks. Should the Navy be permitted such usage we would have no alternative but to cease our volunteer and financial support of the State parks, and would divert out time and attention to parks in other states.³²⁷</p>
<p>"Residents only have one boat ramp in Camano State Park And it is crowded enough from June thru November. Please limit military operations to occur from December - May. Please! Work with the residents.³²⁸</p>
<p>To whom it may concern: The United States Navy is a vital part of our community as well as our protection from foreign and domestic threats. We need the best trained and best equipped personnel and leadership. I strongly, may I repeat strongly support the use of our state parks in the preparation of the best military forces in the world. Please expedite this request and let the Navy do their work. We need to support our forces not oppose them.³²⁹</p>
<p>The Navy seems to want to use Camano Island state parks and beaches for training. They already fly their jets, no objection there. But my concern is the animal life in the oceans adjacent to these recreation areas, and the damage to our environment. The increased boating, jet ski noise, etc., will no</p>

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<p>doubt negatively affect the natural critters that live in these waters. No way the US Navy should be allowed to use our limited beach area for their exercises. Don't tell me they can't find somewhere else.³³⁰</p>
<p>I am 66 years old, and I've never heard of such a proposal. I consider our state parks Sacred! Civilians need places to go to restore their souls. I'm firmly against this proposal.³³¹</p>
<p>I am assuming that during these training events, those days would be closed to the public for park use. Although I support our Military, I am opposed to this plan. We utilize our parks on Camano Island frequently and pay to support them. I especially highly oppose the park's use during our peak usage of Summer. We wait all year for our few short months to enjoy the parks and go camping. With their idea of using up to 27 of our Parks, I can't see why they wouldn't think to encounter a huge pushback from the Citizens.³³²</p>
<p>I am against opening the park for Navy training.³³³</p>
<p>State parks were created for preservation and public enjoyment. The Navy currently are training in 5 state parks, we do not need military training in 29 parks. I pay taxes and also pay for a discover pass to preserve these areas. The military has plenty of other options they can try and leverage.³³⁴</p>
<p>I am in support of the Navy training in and around the parks on Camano Island, or in other areas of Washington State. Exercises and training are necessary to keep our troops at a certain readiness level, and enough processes are in place to halt the exercise if the general public enters the area, and leave to no discernible trace of their presence.³³⁵</p>
<p>NO THANKS!!!! I vote NO. We have enough intrusion on Camano by the Navy, now, with their Growlers.³³⁶</p>
<p>Please reconsider the training at Camano State Park. We are a smaller island with extremely limited public access to our beaches. Without the use of the boat launch we will have no way to use the waters that we have moved here and pay taxes for. I support wholeheartedly our military and have never resented the flying growlers which others have been vocal about. I truly am grateful for the security I feel as you fly overhead. If we had any other alternative ways to access our waterways, believe me, I would never make this request that you find another location for these exercises. There are hundreds of miles of coastline in Washington. Please utilize another location and know that you have my respect and gratitude.³³⁷</p>
<p>I do not support this. I do not want to see our small community more crowded and the small park areas of the beach overrun with equipment and military personnel. This is a peaceful area that has a large increase in activity in the summer and the island community does not want more. Especially at Cama beach with the cabins and small beachfront and the boating center, this would have a very negative impact on recreation. Camano island state park also has a busy boat launch area, and i do not want to see this negatively impacting the economic benefits that comes to Camano as a result of having easy access to the waterway there at Camano island state park. This proposal would have devastating effects on the local community.³³⁸</p>
<p>I don't think it is appropriate to take over state parks for multiple days to do training exercises. State parks are for the citizens of the state to get outside and enjoy the environment, all the time, 365 days a year. Please tell the military to find other venues to do their training that doesn't impact our public spaces. I am a resident of Kirkland and Camano Island.³³⁹</p>
<p>I fully support allowing military to do training exercises at our state parks. These are public parks and it is wrong to discriminate against anyone, especially those in uniform. You can publish a schedule and people can make other plans on those days so they can train in peace. My wife and I are very supportive of this initiative.³⁴⁰</p>
<p>Our military protects and serves us. It is a dangerous job that requires training in a variety of conditions. Some have made the ultimate sacrifice to protect us. We need to honor and support</p>

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<p>them. Allowing the Navy's request to train SEALs in Washington state parks, is a small thing we can do as citizens. Our family is absolutely in support of this initiative! We challenge other Washingtonians to measure the small inconveniences they might experience against providing the training to keep our sons and daughters, fathers and mothers, brothers and sisters who serve, safer.³⁴¹</p>
<p>Do not allow Navy training involving unknowing citizens in Washington State Parks!³⁴²</p>
<p>I am the daughter of a navy commander from WWII. I am opposed to using our park system for wargames. In addition to the risks posed to frequent walkers, dogs, forest wildlife, and fragile eco-systems, outdoor recreation has become essential for safe activities in the covid19 pandemic. The navy owns property on Indian Island etc with similar land and sea approaches for necessary training.³⁴³</p>
<p>Please don't let the military train in our parks.³⁴⁴</p>
<p>I object to the use of state parks for navy training. It is the antithesis of the purpose of state parks to allow them to be used for military practice exercises on unaware Washingtonians. Please do not permit this militarization of our great state resource.³⁴⁵</p>
<p>I object to the Navy's proposal to use our State Parks for training. There are serious problems with the proposal. Allowing the Navy to use our State Parks for training would further militarize our society, taking over a large number of parks (29) for military training. One of the key responsibilities for civil authorities is to tell the military when enough is enough. Just say NO to using public parks for military training.³⁴⁶</p>
<p>I find it difficult to believe we are having this discussion or that that war games in the parks has actually been ongoing before now.</p> <p>It is childish to fail to take the opinions of park users into account because these simulated war games are so exciting to the perpetrators. I can imagine a childhood trauma that lasts a lifetime as a result of some kid's experience during one of these 'games'.</p> <p>I would like to have the concession of renting out paint guns to park users so they can 'hunt the Seals' while recreating. And I assume those Seals tagged by a paint ball would then fail the course.</p> <p>Are there not coastlines the Navy already controls where these things might happen to those who are already part of the Navy family?</p> <p>This is unacceptable and seems to be an anomaly created during some other time when there was no public notification of these plans."</p>
<p>I am writing to voice my opposition to the Navy's proposal for training in Washington State Parks. Our state parks are spaces for enjoyment, for play, for exercise, for relaxation; not for combat training. As a frequent user of our state's wonderful park system, and as a Whidbey Island resident, I am very concerned at the Navy's proposal to use these recreation spaces for military purposes. Please reject the Navy's proposal.³⁴⁸</p>
<p>I am wholeheartedly AGAINST allowing the Navy to use our State Parks for covert training. First, it opens a door that can never be closed again; Pandora will be out of the box. Then what? Drones over our picnics? Second, it violates State Park rules about carrying weapons; are we rule-followers or not? Third, it will very likely encourage self-styled "soldiers" who carry their own weapons to come to the parks and try to find the trainees, which--again--violates State Park rules. I cannot emphasize enough what a BAD IDEA this is, on all levels. Please make every effort to keep this from happening. The Navy has plenty of training ground; it doesn't need our Parks.</p>
<p>The navy training does not belong in our parks. They exist for the people to enjoy.³⁵⁰</p>
<p>In an article in the Whidbey News times in 2017 there is this quote: ""Sheila Murray, Navy Region Northwest Deputy Public Affairs Officer, explained that the training is meant to have no impact on the environment or the public. In fact, members of the public may unwittingly be a part of the training. The intent of the training is to teach trainees the skills needed to avoid detection and to avoid leaving any trace behind during or after the training, according to the Navy. That means conducting operations</p>

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around the public without the public being aware. Even footprints in the sand will be erased when they leave, Murray said. This kind of training can be invaluable for teams if they have to conduct operations secretly in hostile lands, according to Murray. "The whole point of doing it in populated areas is not to be seen," she said. In any rare instances in which the activity is not compatible with the public, an instructor dressed in 'khaki pants and a white T-shirt' instruct people to stay back, Murray said. This quote clearly indicates the Navy's intention to use the public as ""Surveillance Targets."" How can the Washington State Parks condone this use of its park patrons?³⁵¹

Military training in State Parks was a bad idea when it was initiated 5 years ago, and it is still a lousy plan. How does this plan meet the State Parks mission of "to care for state resources and provide recreational access to the public"? It does not. Weapons are not allowed in our Parks. Realistic fake weapons could result in accidents, fear, or misunderstandings when alarmed visitors spot them. I have heard from reliable sources that, though the Navy claims to alert Park staff and local law enforcement prior to using the Park, notification hasn't happened. Is this correct? If you don't know, you need to find out. I frequently take friends and my grandchildren hiking in State Parks and I do not want to be spied upon or risk encountering someone with a "realistic" fake weapon. Please DO NOT allow any expansion of military training in State Parks, and I would much prefer that the 5 parks already in use will be withdrawn from this activity.³⁵²

This is a hazard for those of us who seek a safe and calming atmosphere in our State Parks. I have been diagnosed with PTSD and have a very severe reaction to frightening situations. Please keep this program to the maximum minimum.³⁵³

I wholeheartedly oppose use of our State Parks by the military for any training purposes. These beautiful places are sanctuaries from urban living. They provide spiritual renewal and comfort. These quiet benefits are completely incompatible with hidden surveillance of the public or any war-like activity. The Navy has many other miles of coastline to use. Please NOT our precious parklands.³⁵⁴

As a resident of Port Townsend, I am extremely concerned with what I heard as an attendee in your meeting of 11/19/2020 regarding Navy Seal Training in our State Parks. I have been following the Navy's proposed and past activities in this area for some time, and although Rear Admiral Barnett claimed to be offering "the actual truth" as opposed to the "misinformation being passed around by the public", the information you were given by the Admiral was highly flawed and inaccurate. Most importantly, I heard you say, Commissioner Milner, that you want to be able to look the public in the eye and assure us that the Navy SEAL activities do not involve any surveillance whatsoever. The Admiral claimed that they do not. However, when the Navy first proposed renewing their application for training in the parks, a Navy SEAL trainer stated that the training is specifically for surveillance exercises - to observe the public without being detected, as practice for wartime covert operations. Therefore, either the Admiral or the trainer is poorly informed or was purposely prevaricating. Either way, the lack of truth is shameful. When Rear Admiral Barnett was queried at your meeting, he said the Alaskan shoreline "is limited in scope", but gave no details. "Scope", however, was previously defined by the trainer (mentioned above) as meaning there are no people there to observe. Considering that the water and shoreline in southwest Alaska are nearly identical to that of the Puget Sound, it seems obvious that this lack of people to observe is what the real reasoning is. Furthermore, the Rear Admiral stated that the training would only be done at night "when the parks are closed", which is contrary to what the trainer stated: up to 72 hours per exercise. This makes the Navy's communications with you ambiguous and puts into question every assurance they have made or will make. When asked why they need our State Park beaches, the Rear Admiral said there are certain features of the water and shoreline that are conducive to their needs. He was not specific what those features are. He said that the 46 miles of shoreline the Navy owns in the Puget Sound area is not sufficient. However, it does not take even a few miles of shoreline to conduct these exercises. Obviously the only real reason is because the public is in the parks whereas there is no public to observe on the Navy properties. If

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diversity of shoreline features is what they seek, they can easily purchase what they need. But again, the public is in the parks. He also stated that the training supervisors would be dressed in plain clothes so the public they encounter would not suspect anything. However, their Environmental Assessment states that they would be dressed so as to be easily identified, and would inform anyone wandering into the training area that there are exercises going on. So, which is it?

How will parks personnel track the Navy's activities? How will you know if they stay within the areas and times of agreement? In the past, they have made statements and assurances about what they will do - not just verbally but in legal documents - yet they have over-reached substantially. Witness, for instance, the number of Growler jets: an additional 36 were cited in their Environmental Impact Statement, but in actuality they brought in 54 additional jets. They claim those jets are quieter than the Prowler jets used previously, but in fact the Growlers are louder when performing Field Carrier Landing Practice, according to the Navy's own documents. The Navy cannot be trusted to tell the truth about any of their plans or their current activities. At your meeting they stated that they have been training 'in water' since the 1980s. If they have been successfully training for that long, why the sudden need for our public lands? The Admiral stated a few times, as have his predecessors, that the Navy personnel are 'part of the local community'. They are not. They shop on base, they work on base, and they live here for only about an average of two years. He said, 'We are all in this together', but if that were true he would be truthful to you and to the public. You were assured that the SEALs will never be seen. But these are TRAINEES. By definition, they can make mistakes. It's only a matter of time before they are seen. But in actuality, it doesn't matter whether we see them or not. They will be observing us, and that is unacceptable. The Admiral said the weapons that the SEALs will be carrying have no firing capability. If a member of the public happens to see one, they have no way to know that. Imagine an unsuspecting person who is legally armed suddenly meets one of these SEALs and doesn't know who he is. There was a tragic occurrence of exactly this kind in North Carolina in 2002. A soldier was killed. The public is rapidly becoming aware of the Navy's proposed and past training activities in the Parks, and as was so aptly pointed out in your meeting, there is a 'creep factor' that tourists and locals are feeling which will preclude their willingness to visit the parks. That alone should alarm you. You cannot adequately assure the public that having covert exercises going on around them in the parks is okay. You seemed to be trying to find ways to make compromises so you can approve the Navy's application, instead of approaching this with skepticism. You've come up with highly complex plans that will be nearly impossible to implement. How will it be possible to ensure that these plans are followed? Do you even have the personnel to do this? Why allow this at all? The Navy does not lack for anything; they are not our poor neighbors. They are taking advantage of you and the public. Please do not grant their application.³⁵⁵

So they've already been doing this at five parks and no one noticed. Now they'll spread their activities across 28 parks, thus diluting their potential public contact and environmental impact to virtually zero? Okay.³⁵⁶

As a frequent user of Washington State Parks, I strongly oppose any Naval training exercises in any state park.³⁵⁷

I am writing to you to thank you for your diligence and circumspect attention in assuring that the Washington State Parks are managed to best meet the needs of our people. Where else can we go with our friends and family or on a solo retreat that can provide a stress-free, natural environment, a place where we can breathe deeply and truly relax?

Even though the Navy denies this danger, the plans for clandestine Naval military training going on in our parks create the possibility of park users and military trainees observing or encountering each other. In my understanding this seems contradictory to some of the reasons the Parks System was

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<p>created and exists. Please say ""NO"" to this proposal. Do not let the Navy take our parks away from us.³⁵⁸</p>
<p>With respect, the navy should not use parks for training. Parks are for citizen's recreation. The navy has extensive lands for their training, so they do not need our parks. Using public lands for military uses is also not good public relations, so I'm not sure why the navy has been so intent on trying to get access to parks. Thank you.³⁵⁹</p>
<p>I am AGAINST the military use of our State parks because:</p> <ul style="list-style-type: none">• The military has many miles of shoreline as military property. They could train there. I am not allowed on military land.• Some of WA parkland is already heavily impacted by Navy jet noise. Such as Deception Pass Park. State parks should offer citizens a refuge in quiet nature from the noises and activities outside the parks.• I don't like the military's attitude of not being responsible for damages to parkland.• The Navy has proven to be environmentally irresponsible. Sonar testing harming whales. PFAFs in drinking water and fisheries. Scotch broom on base without maintenance to remove. Fuel drops without warning. Extreme noise pollution.• The Navy jets commonly violate FAA flight altitude regulations. And they make no effort to correct when reported.• I don't want to play "cops and robbers" inside state parkland, wondering who is secretly spying on me.• Power first, public be damned, is not who I want to share my parkland with. <p>Please do not allow the military to train in WA State Parks.³⁶⁰</p>
<p>Since when do the American people have to endure the sights and sounds of our military in public parks? This is something one imagines would happen in a heavy-militaristic country. Please consider NO for navy in public parks.³⁶¹</p>
<p>With respect, the navy should not use parks for training. Parks are for citizen's recreation. The navy has extensive lands for their training, so they do not need our parks. Using public lands for military uses is also not good public relations, so I'm not sure why the navy has been so intent on trying to get access to parks. Thank you.³⁶²</p>
<p>With all due respect, how is it even under consideration to allow clandestine military training in WA State Parks? That is horrifying.</p> <p>The Navy has natural resources available for training that should be utilized. WA State Parks should not expose the general public to the additional risk of accidental injury, loss of expected privacy, loss of enjoyment, and the incitement of fear.</p> <p>Imagine the possible situation where a legally (or illegally) armed park visitor witnesses the "invasion" by water or discovers they are under observation by camouflaged "stalkers."</p> <p>Imagine the mentally ill or predators who emulate or blend with this situation.</p> <p>What happens when a civilian shoots US Navy personnel? Or US Navy personnel shoot a civilian? Injuries and deaths would not be an unexpected outcome. There would likely be collateral injuries. It's that obvious.</p> <p>Armed civilians could claim self defense and believe they are protecting the country, other campers, family members and themselves.</p> <p>NO to Park goes unknowingly participating in war games.</p> <p>NO to the inevitable physical, promotional, and emotional damage to WA State Parks and its reputation.</p> <p>NO to the unpredictable risks to US Navy personnel, nature lovers, families, and tourists this permission would arrange.</p>

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NO to normalization of "takeover by a militia."

NO to this creepy blurring of the lines.

Just NO.

I cannot believe this possibility is being entertained for even a moment.³⁶³

<https://www.whidbeynewstimes.com/letters/letter-say-no-to-clandestine-navy-training-in-parks/>
I am in complete agreement with Gerald Hill's above letter to the editor of the Whidbey-News Times on this matter. Thank you.³⁶⁴

I am vehemently opposed to allowing the Navy to use 29 Washington State parks for the purpose of clandestine training. The military owns 46 miles of waterfront property on which to train. There are nine nearby islands the Navy owns and can practice on for training. Military personnel can be the people to be observed clandestinely. Public parks are for our recreation. Additionally, in this day of Covid-19, more than ever these recreational areas are needed by a stressed population. Please do not militarize our public parks. It is an outrageous and harmful idea.³⁶⁵

I am writing to you to thank you for your diligence and circumspect attention in assuring that the Washington State Parks are managed to best meet the needs of our people. Where else can we go with our friends and family or on a solo retreat that can provide a stress-free, natural environment, a place where we can breathe deeply and truly relax?

Even though the Navy denies this danger, the plans for clandestine Naval military training going on in our parks create the possibility of park users and military trainees observing or encountering each other. In my understanding this seems contradictory to some of the reasons the Parks System was created and exists. Please say "NO" to this proposal. Do not let the Navy take our parks away from us.³⁶⁶

I am 100% against the proposed allowance of the US Navy using OUR State Parks as a secret training ground.

To have military personnel sneaking around day and night while we campers are camping is just mind boggling to allow to happen.

LET THE NAVY TRAIN ON THEIR OWN PROPERTY!!!!³⁶⁷

Thank you for making the November 19, 2020, Item E-1: Naval Special Operations Training in Washington State Parks - Report available. I have reviewed it and added items to my earlier letter of May 16, 2020. In that light:

I submit the following as reasons to neither renew the expiring NAVAL Dept's permit on the 5 State Parks nor approve those and the new 24 State Parks it has requested (The U.S. Navy submitted a request to expand its

Special Operations Training to 29 Washington State Parks.).

Here are the issues (not necessarily in order) of the NAVY's Plan that make any approval inappropriate.

Quotations are from Washington State Parks and Recreation Commission emails and/or the website directed for us to refer:

- The US Navy proposes to conduct covert training at 68 coastal sites in Washington, which includes 29 Washington State Parks. Essentially this is war gaming. Up to 20 camouflaged troops at a time will carry simulated weapons made to look like standard military weapons. They will sneak out of the water and cross beaches to hide in upland vegetation for 2-72 hours while spying on park visitors.
- I live on Whidbey Island. All our waterfront State Parks are included in the list.
- The State Parks were set aside (even donated ie. RAZER State Park) for public enjoyment and recreation, and non-commercial or private development - while maintaining the natural environment and features of the property so designated.

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- What the NAVY desires here is spying on uninformed (Would you go to a State Park knowing these operations could be going on?!), and unsuspecting visitors - hence, COVERT Operations.
- COVERT Training operations are inappropriate as it invades the privacy of visitors and campers (Recall your memory of campfire ghost stories - only now to be made real with Military personnel spying on you!).
- All States have "Peeping Tom" penal Laws. The Covert training of spying on civilians in our State Parks being requested falls under such:
 - "It is also unlawful to invade someone else's privacy while being lawfully on property but while looking (through an opening or peephole) to view someone who has a reasonable expectation of privacy or by using a device such as binoculars or cameras to view or take photographs of others with the intent to invade their privacy. These prohibitions are found under Penal Code 647(j) PC."
- The NAVY's controversial, excessively-loud air training over the Parks is intrusive enough and being re-evaluated because of Citizen and Visitor legal requests. Having these Covert ground maneuvers is over the top.
- The NAVY and other US Military branches have other designated reservations and Bases - many on waterfront acreages (NAS Whidbey has their own beaches). Let these trainings be done on their existing and huge Bases.
- 68 coastal sites minus 29 State Parks = 39 remaining, undisclosed, coastal sites still available to the NAVY in addition to their own training areas & Bases.
- "The Navy has protocols in place to stop exercises if a member of the public enters the training area." Yet, now, the training area is where the public already is, and NAVY wants them (the public) there for Covert purposes (to be spied on!)! Seems a major contradiction.
- "Yes. State law allows the Commission to govern state parks for both public recreation and public benefits" This is a major stretch to call these NAVAL SPYING operations a "public benefit."
- "Does the Navy's request include simulated munitions in state parks?
No. The Navy has not included the simulated building clearance training (which uses simulated munitions) in their application." However, does Simulated weaponry with paint balls not constitute simulated munitions?
- State parks prohibit the display of guns and other weapons, intimidating and disturbing park employees, volunteers, and visitors. The Park environment is put at risk. There is the potential for tragic accidents such as when two military trainees posing as terrorists in North Carolina were shot by an unsuspecting deputy. An Army official called the incident a "fatal misunderstanding."
Do "word games" rationalize deaths?
- "Will State Parks be compensated by the Navy for training activities?
The Navy is responsible for paying the required application processing fee outlined in State Parks' Real Property Agreement fee schedule. (WAC 352-32-300)" Not even a camping or day use fee per group or per vehicle, etc?
- Interestingly, and regularly, the public is told why - for financial reasons - a park is not being opened, why a Park area is closed due to lack of funds to maintain it or repair areas, why it doesn't have the budget to hire adequate personnel. Yet, if you approve the permits, you are not charging significant fees for these permits that approve unusual access, use and privileges the NAVY is being given? This makes no sense either.
- In the "review concluded in October of 2019; the Navy issued a Finding of No Significant Impact (FONSI) for their preferred alternative. (Yet),... "as many as 84 naval special operations trainees and support personnel (safety observers, medical support, boat drivers, vehicle drivers, evaluators, and equipment maintenance/ repair support can be on site at a time during a training event. The request

includes overnight access to most of the parks as trainings can occur over the span of multiple days. Training activities are generally designed to be hard to detect (Spying)... unwanted interaction between the public and trainees. However, each activity appears to bring a significant support presence and seems more likely that the public may notice these personnel during training cycles." (as cited above !). What does "No Significant Impact (FONSI)" means here?

- "Certain sensitive natural areas are currently protected from the public or that could be sensitive to the training activities. Examples include an exclusion area at Fort Casey where there is a known listed sensitive plant called Golden Paintbrush. The exclusion would allow use of this area but only on pre-existing trails. Another example is Hope Island in North Puget Sound. Most of the park is classified as Natural Area Preserve and has therefore been included in an exclusion area and would be off limits to the Navy." So plants are safe all the time, but citizens enjoying the park are not considered "sensitive."???

- "...public comments reveal that perception may have a more substantial impact to visitor experience than actual interaction with the training activity. The idea of someone surveilling (Spying) anything or hiding nearby seems to be a potential visitor concern." Isn't that valid? 9 months of COVID-19 precautions should prove that convincingly ("potential visitor concern").

- Consistency of The Washington State Parks Mission/Policy:
MISSION

The Washington State Parks and Recreation Commission cares for Washington's most treasured lands, waters, and historic places. State parks connect all Washingtonians to their diverse natural and cultural heritage and provide memorable recreational and educational experiences that enhance their lives.

VISION

Washington's State Parks will be cherished destinations with natural, cultural, recreational, artistic, and interpretive experiences that all Washingtonians enjoy, appreciate, and proudly support.

- Training proposed by the Navy does not directly support the mission or vision of Washington State Parks.

- "If it appears that applying the Navy's own BMPs and additional proposed permit requirements will effectively mitigate any impacts from Navy Seal training, staff may bring an action before the Commission for consideration at its January 2021 meeting. Staff anticipates that such a requested action would likely include authorizing the Director to enter into ROE (right of entry (ROE) permits) agreements for individual sites or groups of sites and setting ROE conditions and any other limitations on Navy training activities the Commission determines necessary.

- State Parks has received considerable feedback from the public through public comment letters, emails, phone calls and in-person at Commission meetings. The primary issues raised in public comment are impacts that these trainings may have on public safety, the public's recreational experience, and on the environment. Comments also raise concern that Navy's training exercises are not consistent with State Parks' mission and policies. So what part of the public's response of "NO" is misunderstood?

- So how does this collection of Public comments that raise concern that Navy's training exercises are not consistent with State Parks' mission and policies get ignored? So, again, what part of the public's response of "NO" is misunderstood?

- Our State Parks are for the public to enjoy, use, get immersed in nature and the natural, unique topography of our State. Having COVERT Military Operations in them is wrong and should not be encouraged or approved. JUST SAY "NO !"

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I further understand that a public meeting will be held in January 2021, when such is both discussed and voted on. I would hope adequate publicity and advance notice and location will be given so the public can attend.³⁶⁸

Why, once again is the Commission entertaining Navy Training proposals on our State Park Lands despite overwhelming public opposition to past efforts ? The answer is still NO !³⁶⁹

We are writing on December 7, 2020, to request that you deny the Navy's request for "limited war games" in ALL State Parks. Our reasons are as follows:

Navy's earlier unilateral action: It seems that several years ago the Navy operated under the principle of "It's better to ask for forgiveness than seek permission." Perhaps it was because the Navy feared the public reaction to requesting "limited war games" in State Parks – places that the public has come to equate with rest, recreation, and general well-being. State Parks are places to retreat from world events – not places to become unwittingly involved in military training.

Commission's function: The State Parks Commission function is to set policy for the agency. Staff can and does make recommendations, but ultimately it is for the Commission to decide policy. If we understand correctly, this line of authority was subverted. Staff made the choice to authorize the Navy's (unilateral) actions several years ago. The Commission was not informed about the "limited war games" in parks. This is antithetical to the way policy is established in parks.

The general public: While the Commission was not initially informed of staff action re the Navy's unilateralism, the general public certainly did not know that they played a part in naval war training at the five parks where permission was previously granted. A significant minority of Park users, perhaps a majority, would legitimately balk at the Commission agreeing to the Navy's "limited war games" in State Parks. The public is Parks' constituency and their idea of a State Park needs to be honored. A State Park is not a place for "limited war games."

Washington DNR's example: The Navy requested the DNR to permit movable sensors in conjunction with its Growler airplanes. Then-CPL Goldmark denied the Navy's request. Current - CPL Franz, in an earlier statement, reiterated the policy. The DNR has provided a good precedent for state agencies to follow.

Navy's ownership in NW Washington: The Navy owns over 200 miles of shoreline in Puget Sound. Its ownership is sufficient to provide ample opportunity for "limited war games" on its own land or negotiated, adjacent private land, without pressing public agencies to allow access to public lands.

Militarization of Puget Sound: Currently the Navy owns-influences-or is active in the following: strong influence in the City of Bremerton; the Bangor Naval Submarine Base on Hood Canal; the Whidbey Island Naval Air Station; Indian Island Submarine Base near Pt. Townsend; Growler airplane testing on Whidbey Island and the Olympic Peninsula; sonar activity off the Washington coast that some have claimed is injurious to whales. The Navy is a large presence in Northwest Washington, and the Service does not hesitate to make its influence known. We need a balance. We need our state parks for respite; not for "limited war games."

In closing we reiterate our request. Please deny any and all access to State Parks by the Navy.³⁷⁰

I am writing to ask you to not let our parks be used by the military.³⁷¹

I wish to register my adamant opposition to this proposal! Citizens should be able to enjoy our parks without inadvertently/unwillingly being unwitting subjects of military training exercises-please do not even consider this as worthy of study, certainly not of acceptance.³⁷²

I've lived on Whidbey Island for fifty years, and have seen big changes, some good and some not so good. In the not so good category, I would put the Navy's ever increasing presence in the region. This has been consistent as they have acquired more and more land in the region, increased the number of planes and flights over Whidbey Island and other areas (with increasingly powerful planes and ear splitting results), and upped their presence in our State Parks with clandestine maneuvers.

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In 2015 according to public records, they were doing maneuvers in five state parks, in 2020, the number increased to 29! I am not anti-Navy, but it seems the Navy is intruding more and more into the privacy and well being of the people who pay for their operations, the U.S. taxpayers. When the Navy begins to be viewed with suspicion and downright hostility by many, it is time to take a hard look at the situation. I have spoken with Rick Larsen about this as well.

This is a time when many people are struggling to stay physically and mentally healthy. Being in nature is one of the best ways to maintain health. This is already compromised with Growler operations which make hiking or camping at Deception Pass untenable at times, and sleep impossible during night flights in Coupeville. Let's not compound the problem by discouraging families from using the State Parks because they are paranoid about being watched by an "invisible" Navy Seal. The Navy owns miles of coastline in many areas on Whidbey Island and the Olympic Peninsula. Why can't they schedule their clandestine maneuvers on their own land?

Please SAY NO to increased Navy presence in our State Parks. This is contrary to the stated Mission of the Parks and to the health and well being of the folks in this region.³⁷³

In the matter of the Navy request for a Right of Entry permit for 29 of our state parks, you are undergoing SEPA review of the proposal(s). When you updated the Commission on 11-19-20 that review was still in process. I have a number of questions around that process.

1. When do you expect to complete SEPA review?
2. When do you expect to issue one or more SEPA determinations?
3. How will issuance of those determinations be made public?
4. What is the length of the SEPA comment period and when will it commence?
5. Does State Parks have an internal appeal procedure?
6. In what venue is that appeal to be filed?
7. Is there a filing fee? If so, what is that fee?
8. When does that appeal period begin and what is its duration?
9. What is the relationship between the timing of the SEPA determination, comment period, and potential appeal period and the stated intent of the Commission to make a final decision at its January meeting?³⁷⁴

My name is [REDACTED] and I am a resident of Snohomish county WA. I am opposed to the proposed military exercises in State parks The planned training of Navy Seals in state parks is a bad idea and this should not go forward. Unsuspecting citizens enjoying their state lands and parks should not be subject to such military training.³⁷⁵

Your family and friends from out-of-state are visiting you, and together you choose Whidbey Island as one of your sight-seeing stops.

"Picnicking – camping --- we have beautiful state parks here – can't wait to show you. Your kids will love this!"

Then, on a darkening evening in Ft. Ebey State Park, the ten-year-old boys in the party are so taken by the adventure of trails that they rush off for one last look at the long, beautiful beach.

"Be back soon," you say. "We're setting up the tents."

They do come back --- very soon. "Some men came out of the water after us! They were in camo and their faces were covered in black stuff. We ran as fast as we could. We'd all better get out of here."

Well, it turns out it was the Navy SEALs, practicing their sea to land attacks – in full gear with fake but very realistic weapons.

But this picnic and camping trip was ruined for your visitors. And they will go home to tell others about their unhappy experience.

I'm not against our military. My husband served as a U.S. Naval Aviator during the Viet Nam era. I know training is crucial to military personnel. I was employed on Okinawa as a teacher of children of the military, and I deeply respect the sacrifices made by the military and their families.

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Fortunately, this does not have to be a win/lose decision. Our military owns close to 50 miles of waterfront property within a short distance of Oak Harbor --beaches not accessible to civilians seeking recreation. Here the training can be conducted without endangering or frightening men, women, and children seeking the peace and joy of our state parks. These are two important activities --- military training for the Navy SEALs; and hiking, boating, and camping for families and friends --- but they need to be kept separate for the safety of all concerned. Please make your decision to protect our Washington State Parks for peaceful recreational activities. Thank you for your service to our parks.³⁷⁶

It has come to my attention that the US Navy has recently requested that they be allowed to use 29 WA state Parks for military training of Navy Seals. The purpose of this training is for the Seals to practice landing and surveillance procedures using park visitors as unwitting participants. Furthermore, the Navy would disavow any liability for visitor injury or park damage from said training activities. In my opinion, there is no compelling reason to permit this request by the Navy. To my knowledge, no explanation has been offered by the Navy as to why they need to use any of the state parks. The Navy has numerous other areas under its direct control or on other federal lands that can be used for this training. There is no reason why members of the public should be forced to participate without their knowledge or consent, especially if the Navy will not take responsibility for any harm or damage resulting from their training. Most Washingtonians, like most Americans, want to support our military in any reasonable way that we can, but this is asking way too much and with no justification. The Commission should reject this request.³⁷⁷

I am writing to request that you deny the "Right of Entry" permit for the Navy to conduct covert surveillance training in 29 Washington State Parks, including Deception Pass State Park. These parks belong to the people of the state of Washington to use for recreation and relaxation. Military operations are not compatible with with those things. The Navy has no right to use them to spy on unsuspecting civilians or intimidate them with weapons. To grant the "Right of Entry" permit to the Navy would be a gross misuse of public lands and funds by the Washington States Parks Commission. Please do not militarize our public parks.³⁷⁸

Why, once again is the Commission entertaining Navy Training proposals on our State Park Lands despite overwhelming public opposition to past efforts ? The answer is still NO !³⁷⁹

I am appalled to learn that use of our state parks for training Navy seals is being contemplated. I can't imagine the justification for this in view of the many, many other oceanfront sites available for such military uses. I can, however think of many reasons why this should not be allowed. I live in walking distance to one of our parks and have been a regular visitor to several others. I do not care to catch a glimpse of apparently armed men skulking around and I DEFINITELY do not want to risk having my young grandchildren see such a sight. Every year when we renew our car licenses we are asked to kick in an extra \$5 for our parks. By my calculations, we already give several thousand dollars per year for the maintenance of our military. Why do they require another \$10?³⁸⁰

I am a property owner on Whidbey Island (Reeder Bay just east of Coupeville) and I completely oppose the use of our parks for military training of any kind and specifically my understanding is that the military is proposing use of the parks for Navy Seal or commando type training. This is completely unacceptable and these parks are for public enjoyment and not for military training. Please send me further information as to what parks this is planned for, plan details, and if this will go ahead.

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<p>Please also provide the approval process that the parks department is going through to allow this training to occur on parks property.³⁸¹</p>
<p>I am a property owner on Whidbey Island and I oppose using our state parks for military training of any kind and specifically my understanding is that the Navy is proposing use of the parks for Navy Seal training. Parks are for our enjoyment and not for military training.³⁸²</p>
<p>This letter is written in protest of the plans for the United States Navy to access and “invade” Washington State Parks as part of their training activities.</p> <p>The twenty-nine Real Property Agreement Applications are referenced here:</p> <p>There are many inconsistencies in the documents. On one hand they suggest they will avoid locations that “experience heavy traffic patterns, such as Washington State Ferry System routes...” yet in their map of Ft. Casey Park, they clearly include the Coupeville Ferry Dock in the pink “parcels desired for training.” Furthermore, at Deception Pass Park, the most visited park in the state, they include the entire southern shores of Deception Pass, an extraordinarily busy waterway. In fact, on the aerial photo of the park one sees no fewer than ten boat wakes confirming that this waterway is busy and would not be safe for such water-based activities.</p> <p>I would suggest the whole plan to eliminate or minimize any potential for public interaction is unrealistic. The documents state: “The following is a summary of possible operational options if public presence exists: ceasing to start training, continue training temporarily, suspend training, completely stopping training, or relocating training to another approved training site.” It is unrealistic to believe that the United States Navy will withdraw from an expensive exercise if they run into a couple of hikers on state park trails. It can only be predicted that the Navy will simply remove or evict the park-going citizens and continue with the training exercise. Such an activity would be frightening and traumatizing to the citizens.</p> <p>The safety of the naval personnel is also a concern. There are many citizens who carry concealed weapons and one can imagine a scenario in which such a citizen, when startled or frightened by an unannounced and sudden appearance of unexpected individuals appearing to be in an “invasion,” would react with weapons fire.</p> <p>The Washington State Parks serve many purposes, a few of which include preservation of the natural environment and the enjoyment and education of the population. The parks should not be considered a training ground for the military. There are literally hundreds of miles of shoreline in Washington State. The vast majority of this shoreline is privately owned and numerous citizens would be more than willing to allow naval access to their properties for training activities. It is unreasonable and unwise to use the state parks for such training.³⁸³</p>
<p>Please do not approve the Navy training proposal. I live in Coupeville and love and use all of the parks on the island. What the Navy is describing is invasive and scary. I realize that the Navy needs to train but not in public spaces with civilians and children.³⁸⁴</p>

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