



Westport Municipal Advisory Council

P. O. Box 307, Westport, CA 95488
www.westportmac.org

July 9, 2012

Abbey Stockwell, Project Coordinator
Department of Planning and Building Services
120 West Fir Street
Fort Bragg, CA 95437

Re: CDP #12-2012 (California Department of Parks & Recreation)

Dear Abbey:

The Westport Municipal Advisory Council held a public hearing on the cited permit application at its regular monthly meeting July 3, 2012. Comments were provided by eight people. Although there was some support for natural ecosystem restoration, significant concerns were expressed about the proposed project. Some of the comments were informed by examination of a draft combined Initial Study and Mitigated Negative Declaration and the approved General Plan for MacKerricher State Park. The WMAC unanimously approved a motion to convey the following summary of concerns:

1. Destruction of Coastal Trail: The proposed project will deliberately deconstruct 2.7 miles of the old haul road. This will preclude access for bicyclists and disabled individuals to an existing coastal trail that is mandated by the Mendocino County Local Coastal Program to provide maximum non-vehicular coastal access from Pudding Creek to the Ten Mile River. The General Plan for MacKerricher Park approved in 1995 specifically mandates on page 153: a) haul road maintenance; b) improving the surface for use of pedestrians and bicyclists; c) repair of areas with erosion problems; and d) providing a dune boardwalk north of Ward Avenue where the haul road has been washed away. The proposed project completely ignores and is inconsistent with those mandates and management directives and provides no mitigation for significantly impairing/destroying that required coastal access for bicyclists and disabled persons.

2. Herbicide Use: Concern exists about the use of herbicides to destroy introduced plants. The type of herbicides is not specified in the permit application, but the public is concerned that such chemicals may impact human and ecosystem health. Other methods of removal should be considered. The environmental consequences of different approaches to controlling invasive species should be thoroughly evaluated, giving priority to the method that causes the least harm.

3. Sand Migration: Adjacent property owners are concerned that the removal of European Beach Grass and portions of the haul road will further destabilize the dunes and cause significant sand migration that will adversely affect neighboring private landowners. Prior efforts to manually remove the beach grass have resulted in significant encroachment of dunes onto properties to the south and east, as well as degradation of the haul road through increased erosion or burial that impairs coastal access. Inadequate consideration is given to reliable methods for controlling sand movement and mitigating impacts to neighbors.

4. Adjacent Landowner Notification: One adjacent landowner who attended the WMAC said she was not notified of this pending permit. All adjacent landowners should be notified, consistent with CEQA policies and case law. Their concerns should be heard and factored into the resolution of the significant impacts this project can be expected to cause.

5. Unintended Consequences: Destabilizing the dunes is a risky proposal with many long term and cumulative consequences for surrounding lands, ecosystems, and cultural resources. Those consequences have not been adequately considered. Historic maps including the 1874 Coast Survey, 1916 Army Corps of Engineers Cape Vizcaino 15 minute quadrangle, and 1966 USGS Inglenook 7.5 minute quadrangle should be compared to the modern distribution of dunes and reliable methods should be proposed to ensure sand migration is controlled and significant impacts are addressed. Native species should be reestablished well prior to any action that will destabilize the dunes to ensure sand migration is controlled. Use of native shore pines appears ill-advised due to the spread of pine canker. Sand migration will predictably result in significant impacts such as the deflation of archaeological resources, further erosion/burial of the haul road that impairs use of that coastal access, congestion of hydrologic systems, and movement of the dunes east and south onto neighboring private lands.

The foregoing concerns imply the proposed draft IS/MND is inadequate as means to evaluate and mitigate the significant environmental consequences of this project under CEQA and its implementing regulations and guidance. An EIR should be required with a more robust effort to consider public input and address inconsistencies with the park's General Plan and LCP policies. The park is managed for many purposes according to an approved General Plan, and public coastal access should not be deliberately destroyed without mitigating that loss with a replacement structure such as a boardwalk that from Ward Avenue to the Ten Mile bridge that is accessible to pedestrians, bicyclists, and disabled persons.

We ask that you keep us informed of any revised submittal and notify us in advance of any public hearings on this project so that the citizens within our jurisdiction may continue to provide input as the decision process unfolds. Please contact Chairman Thad Van Bueren at 964-7272 if you have questions about the comments raised by the WMAC.

Sincerely,



Chuck Eyerly, Secretary
Westport MAC

Cc: Renee Pasquinelli, California Department of Parks & Recreation
Kendall Smith, Fourth District Supervisor
Dan Gjerde, Fourth District Supervisor Elect