



## Westport Municipal Advisory Council

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August 10, 2012

Renee Pasquinelli, Senior Environmental Scientist  
Mendocino District, California Department of Parks & Recreation  
12301 North Highway 1 – Box 1  
Mendocino, CA 95460

Re: Comments on revised draft IS/MND for Mackerricher State Park Dune Rehabilitation Project (Mendocino County CDP #12-2012)

Dear Renee:

The WMAC held two public hearings on the cited permit application July 3 and August 7, 2012. Our initial letter to the County is available at [http://www.westportmac.org/documents/CDP#12-2012-WMAC\\_Comments\\_\(7-9-2012\).pdf](http://www.westportmac.org/documents/CDP#12-2012-WMAC_Comments_(7-9-2012).pdf). The second hearing focused on the revised draft Initial Study and Mitigated Negative Declaration released by California Department of Parks & Recreation (DPR) on August 1, 2012. While there is public support for natural ecosystem restoration and preservation of sensitive species, widespread concerns were expressed that the project as presently designed will cause significant impacts that are not analyzed or mitigated. As a result, the preparation of an EIR appears mandatory unless the project is substantively revised. The WMAC approved a motion to convey the following concerns:

1. Destruction of Coastal Trail: Rather than letting natural forces remove the haul road as directed in the adopted General Plan (GP) for the park on page 79, the proposed project will purposefully destroy a long-neglected coastal trail specifically designated for improvement and repair for use by pedestrians and bicyclists (GP page 153). Removal of the haul road will significantly impact existing recreational and non-motorized transportation access by pedestrians, bicycles, wheelchairs. No mitigation is proposed to compensate for that loss of access, nor is it reconciled with other existing policies and directives of the General Plan which specify as a fundamental goal for the dunes to “develop recreational access consistent with natural processes” (page 77). Contrary to an unpublicized internal feasibility study, the public does not accept that a trail for pedestrians, bicycles, and wheelchairs through the Coastal Dunes Resource Management Zone is impractical. Low-cost permeable trail tread materials are readily available and could provide a sensitive solution that addresses directives of the General Plan on pages 78-79 by following a route that minimizes resource conflicts and mitigates impacts.

2. Sand Migration: Adjacent property owners are concerned that the removal of European beach grass and portions of the haul road will mobilize sand migration that will adversely affect neighboring private landowners. The IS/MND recognizes sand will migrate, but no mitigation is proposed. Degradation of the haul road north of Ward Avenue and prior efforts of beach grass removal have resulted in documented encroachment of dunes onto adjacent properties east of the park, as well as degradation of the haul road through increased erosion and/or burial that has impaired coastal access. These impacts are not assessed, and no mitigation is proposed to

compensate neighboring landowners for the loss of use and diminishment in land value that will predictably result from destabilizing the foredunes.

While European beach grass has heightened the foredunes, historic photographs verify the haul road was built on the original surface of the unmodified dunes. The haul road also provides critical habitat for the endangered Howell's spineflower and protects cultural resources that will suffer significant impacts from deflation if nearby sections of the road are removed and erosion is purposefully accelerated. Although destruction of 11% of the entire spineflower population in the preserve by this project is considered acceptable and will be mitigated, damage to non-renewable cultural resources is a significant impact that has not been addressed.

The foregoing concerns imply the proposed revised draft IS/MND is inadequate as means to evaluate and mitigate several significant short term and cumulative long term environmental consequences of this project. An EIR should be prepared to consider public input and address inconsistencies with the park's General Plan and Mendocino County's approved Local Coastal Plan. Adjacent property owners should be specifically notified of the pending environmental review and permit approval processes to ensure their views are taken into consideration.

Input received by the WMAC suggests a more modest approach to habitat manipulation is preferred to the radical plan currently proposed. That would be more consistent with Public Resources Code 5019.71, which states that such activities should occur "only (emphasis added) in those areas found by scientific analysis to require manipulation to preserve species or associations that constitute the basis for the establishment of the natural preserve." Those goals can be met with dune grass and culvert removals, as well as replanting. Leaving the haul road will retain critical habitat and preserve both public access and cultural resources.

The public feels attention should be given to balancing all of the Park's General Plan goals and directives, not selectively implementing some goals to the detriment of public access, neighboring land owners, and cultural resources. We suggest focusing solely on critical habitat preservation, leaving the removal of neglected remnants of the haul road until a plan is developed to construct a context-sensitive recreational and non-motorized replacement trail. Contact WMAC Chairman Thad Van Bueren at 964-7272 with questions about these comments.

Sincerely,



Chuck Eyerly, Secretary

Cc: Abbey Stockwell, Mendocino County Planning & Building Services Department  
Kendall Smith, Fourth District Supervisor  
Dan Gjerde, Fourth District Supervisor Elect  
Liz Burko, DPR District Superintendent  
Janelle Beland, DPR Acting Interim Director  
Bob Merrill, California Coastal Commission  
State Senator Noreen Evans  
State Legislator Wesley Chesbro