Mayor and Councilors:

I would like to elaborate a bit on the “tweaks” we would like to see in the Management Plan and ordinance. Most of this you have heard from others, but just to reiterate:

1. The period in which grading and replanting takes place should be November through March, rather than April to June.  
   
   Our experience over twenty years indicates that grass will grow better in the Spring, and Dr. Hacker confirmed this. Plus grading in the early Spring, say before Spring Break, will be less disruptive.

2. Dune grass spacing should be 18” to 2’ rather than 1’.
   
   We have been planting large clumps of grass, i.e. a 1” bunch or handful, which can fill in 18” quickly.

3. Sand deposited on the beach should be up to 18” deep rather than 4 inches. (12 cm)
   
   The study quoted by CREST (where 12 cm originated) was a rather obscure experiment from the Columbia River, as Tom Horning pointed out. 18” will disappear in two high tides based on our experience. Plus it requires less of an area to spread the sand. Allowing the sand to be washed back into the ocean is much more sustainable than continuing to pile it on the foredune and encroaching on the beach. This should be the preferred practice.

4. Sand should be placed down to 6’ NGVD rather than 9’ as recommended by ODFW.
   
   This was the height given to us by Matt Hunter, ODFW Clam Biologist (503 325 2462 x 227) in Astoria. No razor clams live above 6 feet, which is normally dry sand. Any clammer will tell you it has to be a minus tide to find clams.

5. Sand should be kept away from the buildings a distance of 35’ rather than 20’.
   
   Bruce Francis has elaborated on this, but Ocean Avenue houses are a good example as well, where the 20’ front yards are heavily landscaped.

6. A mixture of native and non-native vegetation should be encouraged for habitat protection.
   
   The Botanist Kathleen Sayce testified that we could provide a much richer environment by scattering seeds of a variety of native plants among the beach grasses, and we have proposed this in the past at Breakers Point. Seed stock is readily available as are other species of grasses. Both Ocean Avenue and Breakers Point are eager to initiate such a program.

7. Chemical fertilizer should not be used because of the harm to the creek and ocean.
   
   Dr. Hacker confirmed this. European beach grass does not need fertilizer to grow
aggressively.

8. Mowing of beach grass should continued to be allowed.

_The one area of the dunes on Ocean Avenue where the owner mows the grass is also the most heavily trafficked by photographers, picnickers, and others. There has been no harm done by this practice. Actually the grass grows thicker and faster after mowing. Please look at the area at the end of Jackson Street to confirm._

9. Permits should be issued for more than one time only, possibly as many as five years with strict monitoring requirements.

_The Planning Commission could issue a conditional use permit for more than one grading action, but the applicant could be required to return to the Commission with a six month monitoring report to make a presentation and correct any failures. This would be coordinated with the State and Federal permit which is generally good for five years._

In conclusion, we appreciate the work of the planning commission and the city council and hope this tremendous amount of work can come to fruition.

Mike Morgan