I am a homeowner at unit 301, Breakers Point condominiums (PO Box 728, Cannon Beach), and submit the following comments with respect to the Foredunes Management Plan.

I have attended several of the hearings, and have read some of the testimony provided at other hearings. It seems that some of those testifying believe that it is necessary to prohibit ALL dune grading. If ANY dune grading is allowed, they seem to believe, the foredune will be destroyed, habitat will be lost, the beach will no longer be a desirable place to visit, and the City will be exposed to wave over-topping.

Similarly, they appear to believe that sand management is a zero sum game, in which there must be winners and losers.

None of this is supported by the science in the Allen Report. That report makes clear that a responsible sand management plan including dune grading, with reasonable limitations as to season, volume, minimum heights, and required re-planting, can halt and possibly reverse the vast accumulations of sand that have occurred North of Ecola Creek, thereby improving access to the beach, and preventing sand inundation of structures, while still leaving a foredune that is substantially higher than the height required to prevent wave over-topping. With reasonable limitations as to season, volume, and required re-planting, dune grading will not be a material inconvenience to beach-goers, or dune-viewers. The draft Cannon Beach sand management plan includes limitations that are more than sufficient to prevent any such inconveniences.

Such a sand management plan will be of benefit to all Cannon Beach residents by providing easier access to the beach and preventing sand inundation of structures, while still preserving a substantial foredune sufficient to prevent wave over-topping, and provide needed habitat.

The proponents of a prohibition of all dune grading appear to believe that a taller dune is a better dune, without limit. The Allen Report indicates that dune elevations North of Ecola Creek increased by 10 to 16 feet from 1997 to 2009 and another 10 to 16 feet from 2009 to 2016, to the current levels above 50 feet. Although it is impossible to predict with certainty what will happen in the future, there is no reason to believe that similar elevation gains will not continue to occur. Is a 60 foot dune better, or more beautiful, than a 50 foot dune, given that the height required for wave over-topping is only 29 feet, according to the Allen Report? Is a 70 foot dune better, or more beautiful, than a 60 foot dune? At some point, surely, there is no value to a higher dune. Given that the existing foredune is vastly taller than that required to prevent wave over-topping, it seems clear to me that we long ago passed that point, and we need to manage the dune going forward to halt and reverse its expansion, both vertically and horizontally (the Allen report indicates that North of Ecola Creek the dune has advanced horizontally about 125 feet since 1997). Doing so will also make available many cubic yards of sand for transport (by wind and wave action) South to areas where sand loss has become a problem as sand accumulates North of Ecola Creek.

I urge you to approve the responsible draft sand management plan under consideration.

Sent from my iPad