September 9, 2019

Cannon Beach Council
City Hall / Fore dune
P.O. Box 368
Cannon Beach Oregon 97110

Dear Council Members,

I have been a consultant to the U.S. National Park Service since the early 1990s and am familiar with its policies and programs regarding natural resource preservation and protection. Regarding non-native species, NPS’s policy is simple. It is to eradicate them.

Although I understand that Cannon Beach is not a national park, I would like to offer two points for you to consider as the Cannon Beach City Council seeks to finalize its plan to manage the sand dune north of Ecola Creek.

1. **A “Natural” Dune:** Protecting and preserving the Cannon Beach dunes are important objectives. In its effort to do that, the City should recognize that the current shape of the dune north of Ecola Creek is not the result of a natural process. Its shape is a product of its dominant, even exclusive, vegetation of non-native and invasive European Beach Grass. Had the dune’s vegetation been a native species, such as American Beach Grass, its shape would be lower and broader. Therefore, the City’s Foredune Management Plan should not accept the premise that the dune’s existing shape is of a natural resource to be preserved and protected. Instead, the dune management plan should seek to produce and sustain a dune that would have been the product of Oregon’s natural process of dune shaping from natural vegetation, namely as though had it been planted with native grass species, such as American Beach Grass and not the non-native invasive European Beach Grass.

If someone had released a mated pair of alligators in Ecola Creek, and they managed to thrive and reproduce over the years by feeding on gulls and an occasional pet dog, the City would certainly not tolerate them. The City would consider the alligators to be a non-native invasive species and quickly eliminate them as a nuisance. Although the European Beach Grass’s does not eat pet dogs, it too is non-native, intrusive and its effect is to form an unnatural dune.

The City acknowledges the non-natural shape of the dune in its Draft "Cannon Beach Foredune Management Plan." On page 18, the City states its desire to produce a dune shape alternative to the existing “tall and narrow dunes,” which the plan acknowledges is the shape built by European Beach Grass, and which the plan acknowledges as being a non-native invasive species.

In the same paragraph, the Draft Plan acknowledges that the desired dune shape is lower and wider than the existing dune, which would provide better storm protection while also maintaining greater ocean views, a dune shape that would be formed by native American Beach Grass.
2. **Replanting for Appropriate Dune Management**: The City's Draft "Cannon Beach Foredune Management Plan" offers a strategy which contradicts its own objective, namely replanting the dune with 50% European Beach Grass and 50% American Beach Grass. There is a serious and obvious flaw in that plan. Presumably, the City understands that the initial 50% non-native invasive European Beach Grass would once again entirely replace the native American Beach Grass and restore the dune to its current unwanted non-natural shape. The more appropriate management plan would acknowledge that fact and attempt to restore the dune to its natural shape by planting 100% native grass species as well as include measures to exclude, not include, non-native invasive European Beach Grass.

Just because American Beach Grass *dies back* in the winter does not mean that it *dies out*. It merely goes dormant, allowing nature to sculpt the dunes into the shape the City desires. But, if co-planted with European Beach Grass, it would not take long for the invasive European Beach Grass to once again entirely replace the American Beach Grass and restore the unwanted dune shape.

The logical conclusion to implementing a management plan that is consistent with the City's objective of seeking the more natural dune shape is to implement a process that used to occur before the introduction of non-native invasive European Beach Grass (probably since time immemorial), by replanting exclusively with American Beach Grass after each management sculpting of the dune.

Sincerely,

[Signature]

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