September 11, 2019

Cannon Beach City Council
c/o Jeff Adams, Planning Director
163 E. Gower St.
Cannon Beach, OR 97110

Via Email Only: dick@ci.cannon-beach.or.us

Re: Foredune Management Plan

Dear Cannon Beach City Council:

Oregon Coast Alliance (ORCA) provides these comments to you concerning the Foredune Management Plan, concerning the future of foredune grading for views in Cannon Beach.

ORCA is an Oregon nonprofit corporation whose mission is protection of coastal natural resources and working with coastal residents to increase community livability and sustainability. We have been involved in the foredune grading controversy in Cannon Beach since 2014, and it has not changed much. The only bright spot was Cannon Beach’s willingness to pay for a new sand study of the entire littoral cell, undertaken by the Department of Geology and Mineral Industries (DOGAMI) and completed in 2017, to replace the partial one provided by Breakers Point in 1997 that, not surprisingly, focused on the Breakers Point area.

After participating in the controversy for five years, ORCA has decided that the only solution to the constant skirmishing is to completely end all foredune grading for views, as was the case in Cannon Beach prior to 1997. It is the only universally fair decision, as the Cannon Beach planning commission recognized in discussing at the outset of its deliberation the importance of simply ending view grading. A more detailed discussion follows.

Breakers Point has continuously, though intermittently, requested foredune grading to maintain views since Cannon Beach first allowed it – at Breakers Point’s initiative – in 1997. No matter how much dune-grading the city decision-makers allow, Breakers Point has desired more. The low point in this game of cat and mouse occurred in 2014, when Breakers Point applied for 75,000 cubic yards of sand removal, nearly ten times more than the city had ever allowed before. The application was ultimately denied. This new process of adopting a new Sand Management Plan and revising city ordinances that regulate dune-grading, is needed and overdue. However, the same dynamics are at play again: Breakers Point (and the Presidential area further south) desires more dune-grading, more “flexibility” in view-grading amounts, and also in replanting options.
Cannon Beach, and the Oregon Parks and Recreation Department (OPRD), which manages the publicly-owned foredunes, have always required replanting with European Beach Grass (EBG). This is because EBG is highly efficient at stabilizing dunes, for which purpose it was deliberately planted on the Oregon coast beginning in about the 1920s, to allow towns like Cannon Beach to be built in dune areas. EBG is an invasive to Oregon, as its cousin, American Beach Grass (ABG). The latter also has dune-stabilizing properties, though it does not do so as effectively as the European variety. Breakers Point has occasionally requested to replant with ABG and/or native species, ostensibly to increase the dunes’ habitat value. However, this is a specious argument: the EBG-stabilized dunes are not biological deserts, as anyone acquainted with them can easily tell. However, planting with ABG or native species would reduce dune stabilization quite dramatically, leading to sand blowing onto adjacent properties, all the way up to Chapman Point, whose homeowners are not allowed by deed restriction to undertake view grading.

ORCA is in favor of the continued use of European Beach Grass to stabilize dunes in front of urban areas – a necessary compromise with invasives for the sake of the built environment. We do not think that American beach grass or the use of native plants is appropriate in urbanized areas, as the result will be sand simply drifting onto other nearby properties. Breakers Point’s efforts to replant using these species is merely a transparent effort to reduce the dunes in front of their homes, at the expense of all the neighbors. Council should reject such a blatantly unfair and self-serving proposal.

In general, ORCA favors the replanting of native plants on Oregon’s coastal dunes; EBG has been and continues to be a serious invasive problem that destroys our coastal dunal environments. We support the use of EBG only in urban areas where stabilizing the dunes is essential for maintenance of urbanized environments. In other instances, ORCA favors removal of EBG, and replanting with natives. For example, we fully support the work of the Oregon Dunes Restoration Collaborative, formed in 2014. It is focusing on removing EBG from the Dunes National Recreation Area, where it has spread massively, stabilized the dunes, and threatens the entire famous dunal ecosystem. But that is an area of more than 40 miles of uninhabited coastline – not the foredunes that protect Cannon Beach.

Additionally, dunes protect Cannon Beach from storm and waves, which are especially dangerous when combined with king tides and strong winds. (DOGAMI Report, p. 57). Strong winter wind and storm activity leads to wave overtopping unless adequate dunes exist to create a barrier. These same forces control the erosion and build-up of dunes over time, and it is critical to allow them to occur with as much flexibility as possible.

Climate change adds another potent factor to the equation, as the DOGAMI report notes: “Such an approach [adaptive management] is even more critical as one considers the potential longer-term climate change impacts, which is likely to tip the current equilibrium impacts towards a state of sand deficit, which could see increased erosion of our beaches and dunes in the near future.” (p. 57).

With these factors in mind, Senators Wyden and Merkley, and others, recently introduced a Living Shorelines Act, which would direct the National Oceanic and Atmospheric Administration (NOAA) to make grants “for purposes of carrying out climate-resilient living
shoreline projects that protect coastal communities by supporting ecosystem functions and habitats with the use of natural materials and systems.” Criteria for receiving a grant under the Act as proposed include: mitigating the effects of erosion, attenuating the impact of coastal storms and storm surge, and mitigating the effects of sea level rise and extreme tides.

Cannon Beach has the incredible luck to have a “living shoreline” of its own – the stabilized dunes. They are the city’s greatest resource against erosion, climate change, king tides and dune reduction by wind and tides acting through the littoral cell system. The dunes need to be protected and cherished.

One final point concerns the eroding area on the north shore of Ecola Creek estuary, near Breakers Point. Over the years Breakers Point has used this legitimate and potentially serious erosion as an excuse for dune-grading, dumping the sand in the eroded area. This has, of course, only temporarily “solved” the problem, until the next storm cycle. The problem cannot be solved that way, nor was it mitigated by the willow-planted burrito placed there a couple of years ago. More recently, Breakers Point tried to apply for a building permit to place a sheetwall at that location, apparently under the assumption that a sheetwall might not be subject to the public hearings process as other options would be. The city rightfully rejected this underhanded attempt. There have been discussions and investigation of doing a cobble berm, possibly with another burrito in addition, at this highly dynamic and eroding site. ORCA fully supports placing a cobble berm at this location, and urges Breakers Point, the City of Cannon Beach, CREST and other relevant partners, to pursue detailed investigation, funding and engineering of such a berm. That would create a solid, permanent solution, fully consonant with the philosophy of Living Shorelines.

For all these reasons, and many others – such as the Cannon Beach economy, and fairness to adjacent landowners who would suffer blowing sand if EBG were not used for replanting – ORCA reiterates that the best solution in the present deliberation would be elimination of all dune-grading for views. This would not affect dune-grading in response to sand inundation. It would be consonant with the emerging philosophy of Living Shorelines that offers the only sane, ecologically-centered means of living on the coast with its natural processes rather than in constant battle with them.

Sincerely,

Cameron La Follette
Executive Director