

CALIFORNIA COASTAL COMMISSION

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F11b/F12a

1-21-0195 (CDFW)

CD-0003-21 (NOAA RC)

May 14, 2021

CORRESPONDENCE

Application 1-21-0195
Agenda item F11b and F12a
May 14, 2021
Coastal Commission Hearing

Please Leave Ocean Ranch Alone

The California Department of Fish and Wildlife management strategy for enhancing wildlife by burning, bulldozing and poisoning habitat the wildlife depends on is unacceptable and indefensible.

The Department has neglected to recognize the comparative projects mentioned in the environmental material that has been conducted by State Parks at Little River State Beach and Gold Bluff's Beach has actually been a disaster for Western Snowy Plover. In fact, suggesting the proposed project at Eel River Wildlife area would somehow benefit plovers is completely unsupported. The studies and monitoring reports and personal observations outlining the failure of the State Parks projects had been provided to the CDFW during the planning process.

The project claims to be using the best available science yet only references a 20 year old study to support a significant part of the plan. Ignoring the well documented and more recent unintended consequences is inexcusable. In the cases of many of the dune vegetation projects the impacts are significant to not only migrating and native wildlife populations but the supporting freshwater coastal wetland habitats as well. The fair argument has been made that the impacts to native and migrating wildlife populations has not been addressed in the CEQA document.

Another major fault in this proposal is that there is no funding source identified for ongoing maintenance or for correcting the inevitable, unintended consequences. This is not uncommon for these types of projects unfortunately. Many similar projects conducted in Humboldt County have simply been abandoned. McDaniel's slough in Arcata is a prime example. Add to that list the Manila Dunes Recreation Area, Friends of the Dunes, Gold Bluffs Beach and even parts of the South Spit. Little River State Beach has and will require continual annual efforts to remove targeted species. Absent from these projects are required monitoring reports from many of the spartina removal efforts around the bay and dune vegetation removal projects that would reveal the outright folly these projects represent. The same can be said for the dune destabilizing projects that have led to the unintended need for the Humboldt Bay Municipal Water Service District to bulldoze protected wetlands in Manila on a regular basis.

If approved and after the fires are out, the bulldozers hauled off, the "experts" walk away and the poisoned zones begin their recovery the surviving critters will have to do their best to piece their home back together.

Please reject this new project until all similar former projects can be fully assessed and objectively scrutinized for their success and failures.

Thank you

Uri Driscoll