

URI DRISCOLL
1578 FICKLE HILL RD
ARCATA CA 95521

May 15, 2017

Humboldt County Planning Commission
825 Fifth St.
Eureka Ca. 95501

Re: BLM CUP No. 16-035

Dear Sirs,

Regarding the referenced application, I would like to submit the following comments.

I am opposed to permitting the vegetation removal project proposed by BLM on this property. My interest is about what I predict will be a long-term negative impact on the South Spit resulting from BLM's larger vegetation removal activities along the coast line. However, my immediate alarm is about conditions of this property not found elsewhere. The property is more vulnerable to damage resulting from removal of vegetation as proposed, and has greater risk to significant environmental damage from the proposed vegetation removal. Further, because of the property's location at the gateway to the unique recreational areas of the South Spit, the cumulative effect the environmental damage would trigger along the coastline would be substantial.

The predominant unusual conditions of concern are:

- The property is located one of the narrowest portions of the South Spit.
- The property's elevation is the lowest along the South Spit coastline.

In the simplest terms I can think of, the potential damage includes:

- The removal of vegetation lowers topography; and vulnerability to tidal over-wash is highest at this property due to its low elevation.
- The vegetation removal enhances sand transport, which would be inland toward the estuary east of the property; and this portion of the Spit would be narrowed even more by westerly encroachment of the estuary toward the ocean.
- The lowering of topography and narrowing of the Spit at this location would transition first to wetlands; and subsequently to a new channel isolating the South Spit.

This scenario is a reasonable and predictable possibility derived from a substantial amount of research. One very important reference supporting the scenario is a Dune Restoration Study by Lindsay Carroll in 2016 (attached as Exhibit A, with a cover page summarizing the relevant conclusions). Attached (as

Exhibit B) is a listing of other key references that support my scenario. Also attached (as Exhibit C) are Aerial photos that clearly show the unusual conditions of this property.

It is my recommendation and request that your Commission deny this permit.

Respectfully,

Uri Driscoll

Exhibits:

- A. Dune restoration study (Lindsay Carroll 2016) with summary
- B. List of References with summation of conclusions
- C. Aerial Photos of south spit

