



July 12, 2022

Cliff Johnson, Supervising Planner  
Humboldt County Planning & Building Department  
3015 H Street  
Eureka, CA 95501  
Submitted via email to [planningclerk@humboldt.ca.gov](mailto:planningclerk@humboldt.ca.gov)

Re: Support for Friends of the Dunes Trail and Habitat Restoration Project

Dear Mr. Johnson,

I submit these comments on behalf of Humboldt Baykeeper on the Initial Study and Proposed Mitigated Negative Declaration and the proposed amendments to existing Coastal Development Permit CDP-06-49MMX and Conditional Use Permit/Special Permit CUP-06-14MMX/SP-06-71M for the Friends of the Dunes Trail and Habitat Restoration Project on the former "Barr" property in Manila (APN 400-011-075). Humboldt Baykeeper was launched in 2004 with a mission to safeguard coastal resources for the health, enjoyment, and economic strength of the Humboldt Bay community through education, scientific research, and enforcement of laws to fight pollution.

The Friends of the Dunes' goal is to restore the natural diversity of plants and animals to the dunes and where appropriate, help return natural processes that sustain dune ecosystems. Where native dunes are restored, diverse flora and fauna thrive. Restored dunes along the Samoa Peninsula are some of the most celebrated and appreciated native ecosystems in our region, inspiring residents, students, and visitors.

This project proposes hand removal of invasive, non-native plants including annual grasses, iceplant, and yellow bush lupine with the goal of restoring endangered plant communities. Invasive plant removal allows native plants to recolonize new clearings from the seedbank. Friends of the Dunes does not use herbicides or heavy equipment, allowing careful removal of invasive plants while protecting the native flora and fauna.

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The Humboldt Bay community has been working with Friends of the Dunes to do this habitat restoration work for the last 40 years, often on a volunteer basis. Removal of invasive species leads directly to increased native biodiversity, including many species of wildflowers and more than 40 species of native bees that depend on them.

The Friends of the Dunes' updated Restoration Plan is a well-researched and well-supported guiding document which contains reasonable avoidance measures to protect wetlands and sensitive plant species. It sets meaningful and achievable goals for habitat restoration. Friends of the Dunes has been monitoring restoration projects since 2008. Photo monitoring reports show native plants returning where invasive species have been removed. Friends of the Dunes has updated its Restoration Plan, and should be allowed to implement this plan across all of its property, including the Barr Parcel.

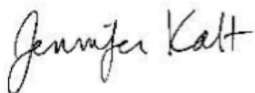
The Mitigated Negative Declaration for the Project conducts a thorough impact analysis of the very limited development proposed for the Barr Parcel. Despite unsupported claims about impacts to wetlands, there is no evidence that removal of invasive species like European beachgrass adversely impacts the seasonal wetlands known as dune hollows. In fact, studies have found that wetlands in the deflation plain behind restored foredunes have expanded since restoration activities took place at Lanphere Dunes, pointing to net increase of coastal freshwater wetlands in restored dune ecosystems.

As a result of community-supported restoration efforts led by Friends of the Dunes over many years, the Humboldt Bay area's coastal dunes are the best preserved, most intact coastal dunes on the U.S. West Coast. There is more work to be done to preserve this unique habitats, and Humboldt Baykeeper strongly values and supports the efforts of Friends of the Dunes and its partners to restore the native biodiversity of our coastal environments.

We strongly urge the County to issue a Coastal Development Permit amendment consistent with the Mitigated Negative Declaration for the Project.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Jennifer Kalt". The signature is written in a cursive, flowing style.

Jennifer Kalt, Executive Director  
[jkalt@humboldtbaykeeper.org](mailto:jkalt@humboldtbaykeeper.org)

Cc: Mike Cipra, Friends of the Dunes